NOTICE

COMPTON CITY COUNCIL
AGENDA
Tuesday, February 17, 2015
3:30 PM

HEARING

3:35 P.M. PUBLIC HEARING - FOR A CODE TEXT AMENDMENT TO CREATE A MODIFIED PARKING REQUIREMENT (Item #10)

OPENING

MOMENT OF SILENCE

ROLL CALL

INTRODUCTION OF SPECIAL GUESTS

PUBLIC COMMENTS ON AGENDA ITEMS AND NON-AGENDA MATTERS

CONSENT AGENDA

Consent items are routine and expected to be non-controversial. They will be acted upon by the Council at one time without discussion unless a Council Member requests an item be removed or discussed.

APPROVAL OF MINUTES

1. FEBRUARY 3, 2015

REPORTS OF OFFICERS AND COMMISSIONS

CITY MANAGER/CITY ATTORNEY/CITY TREASURER REPORTS

2. INVESTMENT REPORT - December 2014 **(Receive/File)**

PUBLIC WORKS MUNICIPAL UTILITIES DEPARTMENT

3. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO SIGN THE CERTIFICATE OF ACCEPTANCE DOCUMENT TO ACCEPT THE TRANSFER AND CONVEYANCE FROM THE COUNTY SANITATION DISTRICT NO. 2 OF LOS ANGELES COUNTY OF THE STATE OF CALIFORNIA (DISTRICT) OF THE SEWER FACILITIES AS DETAILED ON DISTRICT DRAWING NO. JO.p-0438 IN THE CITY OF COMPTON FOR FUTURE OPERATION, MAINTENANCE, REPAIR AND IMPROVEMENT

END CONSENT AGENDA

REGULAR AGENDA

REPORTS OF OFFICERS, BOARDS, COMMISSIONS AND COMMITTEES AND CITY COUNCIL

CITY MANAGER'S REPORT

4. ANNOUNCEMENT OF A COMMUNITY MEETING ON THE BICYCLE MASTER PLAN TO BE HELD ON MARCH 11, 2015 AT 7:00 PM IN THE COUNCIL CHAMBERS OF CITY HALL **(Receive/File)**

5. ORAL REPORT - GRAFFITI REMOVAL SERVICES PERFORMED BY URBAN GRAFFITI

6. ORAL REPORT - COMPTON CHRISTMAS PARADE 2014 **(Parks and Recreation)**

CITY ATTORNEY'S REPORTS

7. ORAL REPORT - Jackson v. City of Compton, Case No.: BS142 759
Request for Reconsideration

UNFINISHED BUSINESS

NEW BUSINESS

8. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO AMEND THE AGREEMENT WITH ROBERT KEYES FOR PROJECT MANAGEMENT SERVICES ON THE CITY-WIDE CAMERA SURVEILLANCE PROJECT AND ISSUE A PURCHASE ORDER IN THE AMOUNT OF $50,000

9. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON TO TERMINATE THE STATE LEGISLATIVE ADVOCACY AGREEMENT WITH STRATEGIC COUNSEL, PLC AND TO ENTER INTO AN AGREEMENT WITH THE LAW OFFICE OF ANTHONY WILLOUGHBY AND ASSOCIATES FOR THE BALANCE OF FISCAL YEAR 2014-2015

10. AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF COMPTON AMENDING CHAPTER 30 (ZONING CODE) OF THE COMPTON MUNICIPAL CODE BY DELETING SECTION 30-21.11.C AND ADDING SECTION 30-21.12 TO ESTABLISH REGULATIONS FOR A MODIFIED PARKING REQUIREMENT **(First Reading)**

APPROVAL OF WARRANTS

COUNCIL COMMENTS

ADJOURNMENT

NEXT REGULAR MEETING: Tuesday, February 24, 2015 @ 5:45 PM.

Visit our website at http://www.comptoncity.org

View Meetings Live at mms://livemedia.comptoncity.org:8080

FEBRUARY 10, 2015

The City Council meeting was called to order at 3:47 p.m. in the Council Chambers of City Hall by Mayor Aja Brown. The Pledge of Allegiance and Moment of Silence ceremonies were also led by Mayor Aja Brown.

ROLL CALL

Council Members Present: **Zurita, Arceneaux, Jones, Brown**
Council Members Absent: **Galvan**

Other Officials Present: **C. Cornwell, A. Godwin, J. Ford**

COMMENDATORY RESOLUTIONS/PRESENTATIONS

1. CHRISTMAS DECORATION CONTEST AWARD PRESENTATION (Block Club Commission) **(Reagendad)**

PUBLIC COMMENTS ON AGENDA ITEMS AND NON-AGENDA MATTERS

Patricia Simpson, Compton resident, charged that she and a group of other seniors were very upset that Senator Isadore Hall III was recognized with a street dedication before Judge Filer, Mr. Adams and Walter Tucker, Sr. She acknowledged Mayor Brown' presence on television and in magazines and cited that she has yet to do anything for the citizens of Compton. She asserted that City Council members are elected to work for the citizens so therefore they should be given the opportunity to vote for what they want. She went on to question whether or not Mayor Brown is spending the City's money when she travels. She also maintained that the seniors should have stayed in the original Dollarhide Neighborhood Center facility. She declared that she and others believe Mayor Brown recognized Senator Hall III because he will assist her in her political career. She stated that during the Christmas season, Mayor Brown visited a community convalescent home and did nothing but introduce herself. Lastly, she requested the number of days elected officials are allowed to miss City Council meetings.

Mayor Brown stated that she would be happy to speak with any citizen that has questions or concerns. She also noted that she spends her own money when she travels; and as it relates to the street recognition, the City Council approved that item in addition to discussing the establishment of a Historic Preservation Committee. She also mentioned that she donates a Christmas tree to the convalescent home every year for the past two years as well as food and entertainment.

Michael Franklin, Covered California, advised the citizens of Compton to ensure that they have health insurance before filing their taxes to avoid owing the government. He went on to announce a "Healthcare Enrollment Fair" to be held Saturday, February 7, 2015 from 10 a.m. to 3 p.m. at Greater Zion Church located at 2480 North Wilmington Avenue.

Beatie Carroll, Compton resident, stated that it upsets her to see an item on the agenda recognizing the Block Club Commission because she was not notified. She went on to state that it has been twelve years since the City's streets were repaired and asserted that there is a lot of rhetoric going on. She further urged the citizens to stop voting for candidates they do not know. She mentioned trying to acquire the Dollarhide Community Center for her 82nd birthday and discovered that there were not enough parking spaces for the handicapped and that a wall is built between the new parking structure and the Dollarhide Community Center. She asked why the City Council chose to name the new facility on Tamarind Avenue after Douglas Dollarhide when the original memorial to the first African American mayor of Compton is located on Rosecrans and Oleander Street.

Benjamin Holifield, Compton resident, insisted that Tamarind Avenue is supposed to be called Dollarhide Drive. He also noted that there was no prior intent to name the new facility after Douglas Dollarhide; it was always supposed to be a community center which is why the seniors are upset.

He asked the City Manager to visit the seniors at the Center to hear their concerns. He also maintained that no one said anything when Emily Hart-Holifield's name was not transferred to the new library facility. He went on to invite the business community to participate in the upcoming Compton Business Chamber of Commerce meeting to be held Wednesday, February 4, 2015 at 12 p.m. at Compton's IHOP restaurant.

Shawn Halberson, Vice President of Compton Firefighters Local 2216, thanked the City Council in advance for their consideration of the approval of their Memorandum of Agreement (MOA).

Herbert Arceneaux, Compton resident, asked the City to address the lighting around City-owned facilities, but more specifically 600 North Alameda Avenue. He also asked that the City upgrade the equipment used during City-sponsored events. He further asked that someone investigate the possibility of Compton getting a BlueLine Transit 'quiet zone' designation on Willowbrook Avenue. He also inquired about someone writing a letter to the Post Office requesting that mail be delivered during daylight hours.

Councilperson Zurita informed Mr. Arceneaux that she reported the lighting at 600 North Alameda to the City Manager last night.

City Manager Ford stated that he was notified by Charles Nelson that a call would have to go to Southern California Edison to fix the lights.

Lynn Boone, Compton resident, petitioned Councilperson Zurita to verify whether or not fire or building permits are posted inside the Dollarhide Community Center because it is unlawful to open a facility without adequate parking. She referenced Item No. 6 and questioned why the City is rejecting the bid after so much work has been completed. She also referenced Item No. 7 and asked if the contractor would hire locally, if there is a clause in the contract for change orders, and who, from the City, will be evaluating the contractor's performance. She made reference to Item No. 8 and stated that she knew the idea of a payment plan would be denied. She also referred to Item No. 11 and maintained that she is not pleased with the MOU because she believes that Compton firefighters deserve more. She asserted that this is one of the most ill-informed City Council collectives in the history of the City of Compton and that Councilperson Arceneaux knows that everything done in the City is supposed to come before this Body. She charged that Johnny Ford was chosen to be city manager because he will do whatever is required to keep his job. She also asked that Councilperson Zurita request a report from the City Manager regarding detailing the number of projects voted on by this City Council.

Councilperson Zurita asked the City Manager to address whether or not the City has a fire permit posted inside the Dollarhide Community Center.

Bryan Batiste, Deputy Fire Chief, confirmed that there is a certificate of occupancy posted inside the Dollarhide Community Center which verifies that the facility passed the final fire and building inspections. Mr. Batiste also mentioned the parking structure which is currently in progress.

Councilperson Zurita proposed that in an effort to give the seniors their own facility, the City Council should approve the renovation of the original Douglas Dollarhide Neighborhood Center utilizing funds allocated to upgrade City Hall.

Mayor Brown proposed that a survey be conducted to obtain an overall consensus from the senior community. In addition, Mayor Brown expressed concerns for the type of financial obligations the City would incur in terms of the older facility because when the new center was being proposed there were discussions regarding whether or not the City would lease or sell the original Dollarhide Center.

CONSENT AGENDA

On motion by Zurita, seconded by Arceneaux, the Consent Agenda was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT:Council Members - None

APPROVAL OF MINUTES

2. JANUARY 20, 2015 **(Approved)**

END CONSENT AGENDA

REGULAR AGENDA

CITY MANAGER'S REPORT

3. A REQUEST TO SCHEDULE A PUBLIC HEARING FOR GENERAL PLAN AMENDMENT CASE NO. 2013-002/NEGATIVE DECLARATION NO. 932 - (1940 N. Bullis Road)

On motion by Zurita, seconded by Arceneaux, a public hearing was scheduled for Tuesday, February 24, 2015 at 5:50 p.m., by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT:Council Members - None

4. MINUTE MOTION - REQUEST TO INITIATE REQUEST FOR PROPOSAL (RFP) PROCESS FOR STATE LOBBYING SERVICES FOR FISCAL YEAR 2015-2016 **(Removed For Further Consideration)**

CITY ATTORNEY REPORTS - There were no City Attorney Reports.

UNFINISHED BUSINESS - There was no Unfinished Business.

NEW BUSINESS

5. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER TO PARAMOUNT STATION INC. DBA PARAMOUNT CHEVRON, VOYAGER INC. DBA US BANK VOYAGER FLEET SYSTEMS AND KING II GAS AND MART (VALERO) FOR THE PURCHASE OF GASOLINE AND DIESEL FUEL FOR CITY OWNED VEHICLES ($182,943)

Councilperson Zurita asked the City Manager to address why the City is not considering purchasing gasoline from local gas stations.

City Manager Ford remarked that this resolution authorizes the City to pay its debt to participating gas stations so that staff can purchase needed fuels from local gas stations. Mr. Ford also noted that Item No. 7 addresses the repair and maintenance of the City's own fueling station located within the City yard.

Councilperson Zurita asked the City Manager if the City is issued credit from participating fueling stations. City Manager Ford explained that staff is currently using gas cards to fill-up at the Valero gas station located on Compton Boulevard.

Councilperson Zurita asked if each employee with a City vehicle is given a gas card.

Triphenia Simmons, Director of General Services, answered that each department head or lead supervisor has a gas card for their department.

Councilperson Zurita asked how the gas cards are monitored. Ms. Simmons remarked that each gas card is limited to ten fill-ups per week per City vehicle.

Councilperson Arceneaux asked if staff's reason for not purchasing gas within the City of Compton was due to non-competitive pricing.

Ms. Simmons stated that most local fueling stations do not want to extend credit in accordance to the City's 30-day billing cycle.

Mayor Brown stated that she remembers when the City's fueling station went down and that she was glad to see the City Manager taking the initiative to repair them.

On motion by Zurita, seconded by Arceneaux, **Resolution #24,079** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER TO PARAMOUNT STATION INC. DBA PARAMOUNT CHEVRON, VOYAGER INC. DBA US BANK VOYAGER FLEET SYSTEMS AND KING II GAS AND MART (VALERO) FOR THE PURCHASE OF GASOLINE AND DIESEL FUEL FOR CITY OWNED VEHICLES ($182,943)"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

6. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO REJECT THE BID OF ARDALAN CONSTRUCTION COMPANY TO PROVIDE CONSTRUCTION SERVICES FOR THE PARKS IMPROVEMENT PROJECT AND REISSUE BID INVITATION

Marvin Hunt, Deputy Director of Parks & Recreation, informed the City Council that in November 2014, the City received one bid from Ardalan Construction at $4,495,000 for the construction of Sebrie Park, Lueders Park and South Park approximately $2.3M over the engineer's projected estimate. On December 3, 2014, former City Manager Duffey authorized staff to move forward to value engineer the project to reduce costs. As a result, costs were reduced to $3.3M after which Mr. Ford advised staff to end negotiations and move towards rejecting the bid and re-releasing the invitation.

Councilperson Galvan asked Mr. Hunt when he expects the project to be completed. Mr. Hunt stated that he anticipates the completion of the parks project five months from mid-March.

Mayor Brown proposed that the City Council consider utilizing those funds to upgrade all City parks to a standard level of operation because some parks lack the simple necessities of basketball nets and restrooms.

Mayor Brown asked Mr. Hunt if a needs assessment was performed on all City parks.

Mr. Hunt confirmed that a needs assessment was conducted however it was determined that there were certain things, in regards to these three different sites that the former City Manager wanted to push forward and promote.

Councilperson Galvan agreed with the comments made by Mayor Brown and noted that lighting should also be addressed at each of the City's parks, but more specifically Lueders Park.

Councilperson Zurita asked if most or all of the equipment has been purchased for the parks. Mr. Hunt acknowledged that a fair amount of equipment for all project sites have been purchased with CDBG funding.

Councilperson Zurita indicated that because the youth have limited choices for entertainment in the City of Compton park repair and maintenance should be a priority. Ms. Zurita also noted that she was unclear as to why this project is being discontinued and/or sabotaged.

Councilperson Zurita asked that Sebrie Park be taken out of the C.A.RE. project because it is not functional at this time; in addition the Compton Unified School District has indicated that they are willing to allocate monies towards making a full baseball diamond at Sebrie Park.

Mayor Brown maintained that her concern is that each of the City's parks receive an equal distribution of funding for rehabilitation.

Councilperson Zurita proposed an allocation of funding from the City Hall renovation budget to rehabilitate the City's parks.

City Attorney Cornwell reported that 2008 Lease Revenue Bonds are expended per their approved resolution which allocates funding for projects listed. Additionally, resolutions can be rescinded so that a new list of projects can be added or so the Body can make whatever changes they desire.

Councilperson Zurita asked the City Council to consider supporting the rehabilitation of Sebrie Park which was destroyed by a water well project.

Mayor Brown asked Mr. Hunt to comment on the total dollar amount needed to bring all City parks up to a standard level. Mr. Hunt confirmed that he would prepare an itemized listing of required items that would bring the City's parks up to standard.

Mayor Brown also asked that the assessment include the Compton Par 3 Golf Course and advised the City Council to be mindful that Lease Revenue Bonds have to be paid back.

Councilperson Galvan stated that if the City's state lobbyist was working, then maybe the City could have received grant funding for its parks. Mr. Galvan went on to articulate concerns for a potential increase in crime during the summer months and how the youth will be affected.

Councilperson Arceneaux voiced a concern for Burrell McDonald Park's lack of staffing, old furniture, adequate lighting throughout the park and the availability of youth programs.

Mr. Hunt assured Councilperson Galvan that smaller parks would be completed within a smaller window after the bid is accepted. He also acknowledged the concerns expressed by Councilperson Arceneaux and noted that all parks would receive new equipment and new furniture.

Councilperson Arceneaux stated that she certainly hopes staff has worked out their staffing issues because youth activities previously held at Burrell McDonald Park were sent to Gonzales Park.

Mr. Hunt explained that the football program was sent to Gonzales Park due to lighting issues.

Councilperson Arceneaux charged that, that is an unacceptable excuse and not because it is dark in the park but because there are security issues.

Councilperson Galvan stated that he is shocked that staff even considered giving Councilperson Arceneaux old furniture and happy that the City Council made administration changes. Mr. Galvan also stated that it is imperative that the City Manager hold staff accountable for doing their job.

Mayor Brown reiterated the need to get back to the basics as it relates to adequate lighting in and around City-owned facilities. Additionally, she requested the dollar amount for what is needed in the parks to function, i.e. lighting and restrooms, which can be addressed and forecasted in the upcoming budget cycle.

Mayor Brown also proposed a phased out approach to the park construction schedule to ensure the City's parks are functional and available during the summer months.

Councilperson Zurita asked if there were any time-sensitive issues affecting the funds and construction schedule. Mr. Ford answered that all time-sensitive funds were used to purchase the park equipment.

Jim Packal, principal with M.I.G., noted that the compressed time schedule (four weeks to two weeks) affected the bidding period as well as the construction schedule which prevented a lot of general contractors from bidding on the contract.

Councilperson Zurita requested a copy of the proposed time line.

Councilperson Arceneaux requested an opportunity to discuss the needs for Burrell McDonald Park.

Mayor Brown questioned how staff prepared recommendations that resulted in Burrell McDonald Park receiving used furniture.

Mr. Hunt answered that staff received the recommendations from the former City Manager.

On motion by Zurita, seconded by Jones, **Resolution # 24,080** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO REJECT THE BID OF ARDALAN CONSTRUCTION COMPANY TO PROVIDE CONSTRUCTION SERVICES FOR THE PARKS IMPROVEMENT PROJECT AND REISSUE BID INVITATION"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

7. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON ACCEPTING THE PROPOSAL FROM S.C. FUELING SOLUTIONS AND AUTHORIZING THE CITY MANAGER TO ENTER INTO A PROFESSIONAL SERVICE AGREEMENT AND ISSUE A PURCHASE ORDER S.C. FUELING SOLUTIONS TO PROVIDE REPAIR/UPGRADES FOR THE FUEL PUMPS AT THE CITY'S MAINTENANCE YARD ($92,241.20)

On motion by Arceneaux, seconded by Jones, **Resolution # 24,081** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON ACCEPTING THE PROPOSAL FROM S.C. FUELING SOLUTIONS AND AUTHORIZING THE CITY MANAGER TO ENTER INTO A PROFESSIONAL SERVICE AGREEMENT AND ISSUE A PURCHASE ORDER S.C. FUELING SOLUTIONS TO PROVIDE REPAIR/UPGRADES FOR THE FUEL PUMPS AT THE CITY'S MAINTENANCE YARD ($92,241.20)"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

8. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER FOR REMITTANCE TO THE LOS ANGELES COUNTY AUDITORCONTROLLER FOR CERTAIN UNALLOWABLE ASSETS TRANSFERRED TO THE CITY OF COMPTON ($4,105,700)

Councilperson Arceneaux requested an explanation.

City Manager Ford reported that from January 2011 to January 31, 2012, the Successor Agency had been paying the City of Compton for a general liability insurance policy; and consequently the Department of Finance determined that it was an unallowable expense which has resulted in the City reimbursing the state of California the aforementioned amount.

On motion by Arceneaux, seconded by Jones, **Resolution # 24,082** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER FOR REMITTANCE TO THE LOS ANGELES COUNTY AUDITORCONTROLLER FOR CERTAIN UNALLOWABLE ASSETS TRANSFERRED TO THE CITY OF COMPTON ($4,105,700)"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

9. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER FOR REMITTANCE TO THE LOS ANGELES COUNTY AUDITOR CONTROLLER PURSUANT TO THE LOW AND MODERATE INCOME HOUSING FUNDS DUE DILLIGENCE REVIEW REPORT ($544,173)

On motion by Zurita, seconded by Arceneaux, **Resolution # 24,083** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO ISSUE A PURCHASE ORDER FOR REMITTANCE TO THE LOS ANGELES COUNTY AUDITOR CONTROLLER PURSUANT TO THE LOW AND MODERATE INCOME HOUSING FUNDS DUE DILLIGENCE REVIEW REPORT ($544,173)"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

10. A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON SERVING IN THE CAPACITY OF HOUSING SUCCESSOR REQUESTING TRANSFER OF AVAILABLE 2010 TAX ALLOCATION BOND PROCEEDS (SERIES A HOUSING BONDS) TO FUND AFFORDABLE HOUSING PROGRAMS IN THE COMMUNITY

On motion by Zurita, seconded by Jones, **Resolution #24,084** entitled **"A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON SERVING IN THE CAPACITY OF HOUSING SUCCESSOR REQUESTING TRANSFER OF AVAILABLE 2010 TAX ALLOCATION BOND PROCEEDS (SERIES A HOUSING BONDS) TO FUND AFFORDABLE HOUSING PROGRAMS IN THE COMMUNITY"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

11. A RESOLUTION OF THE COMPTON CITY COUNCIL APPROVING A MEMORANDUM OF AGREEMENT (MOA) BETWEEN THE CITY OF COMPTON AND THE COMPTON FIREFIGHTERS, LOCAL 2216 FOR FISCAL YEARS 2015-2016

On motion by Zurita, seconded by Jones, **Resolution # 24,085** entitled **"A RESOLUTION OF THE COMPTON CITY COUNCIL APPROVING A MEMORANDUM OF AGREEMENT (MOA) BETWEEN THE CITY OF COMPTON AND THE COMPTON FIREFIGHTERS, LOCAL 2216 FOR FISCAL YEARS 2015-2016"** was approved, by the following vote on roll call:

AYES: Council Members - Zurita, Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - None

APPROVAL OF WARRANTS - There were no warrants to be approved.

#1.

COUNCIL COMMENTS

Councilperson Zurita offered the following announcements/communications:

- Asked the City Manager to bring back an item for the City Council to consider placing all travel paid for with City funds on the agenda.

- Attended the National Association for Equal Justice in America (NAEJA) meeting and Swearing-In Ceremony for Senator Isadore Hall III.

- Swearing-In Ceremony for 64th District Assemblyman Mike Gipson will be held Saturday, February 7, 2015 in the campus theatre of California State University Dominguez Hills at 10 a.m. For more information please call (310) 223-1201.

- California State Board of Equalization Chairman Jerome Horton and Assemblyman Mike Gipson will be hosting a California Educational Solutions workshop on tax preparation.

- Brickyard Townhall meeting will be held Saturday, February 7, 2015 at Gonzales Park from 5 p.m. to 6:30 p.m.

Black History Month Recognitions
George Crum (creator of the potato chip)

***Councilperson Zurita exited the meeting at 5:45 p.m.**

Councilperson Galvan offered the following announcements/communications:

- Asked the City Manager to designate a City employee that monitors the parks every other day to assess the facilities.

- Asked the City Manager to see if he could make the parks youth sports programs more affordable.

- Second District Townhall meeting will be held Wednesday, February 4, 2015 at Our Lady of Victory Church at 5:30 p.m.

Councilperson Arceneaux offered the following announcements/communications:

- Commented on the success of the Compton Initiative Third District Clean-Up last Saturday wherein 1,000+ volunteers particiated.

- Third District Townhall meeting will be held Thursday, February 12, 2015 at Burrell McDonald Park from 6 p.m. to 7 p.m.

- Announced that she would be co-hosting a Black History Month program with Councilperson Jones to be held Friday, February 27, 2015 at the Dollarhide Community Center from 10 am. to 2 p.m. There will be live entertainment, motivational speaking, and a catered lunch. For more information please call (310) 605-5688.

- Commented on the events that occurred during the filming of the "Straight Outta Compton" trailer in which Shug Knight allegedly killed one man and injured another.

- Inquired about the City of Compton's permit and proper notification process.

    - City Manager Ford reported that initially a film permit application is filled out, then it is filtered throughout the various departments, and once approved, it is sent back to the City Manager's office for final approval.

- **Neil Holmes,** indicated that the Sheriffs' Department was very involved in this process as well. He maintained that this was an isolated case and not a part of the movie itself or the filming. All permits were pulled and provided to the City Manager's Office.

- Expressed concerns for a permit process that allows producers to film in the City of Compton without properly notifying the members of the City Council.

    - City Manager Ford assured Councilperson Arceneaux that staff will refine the permit and pricing perspective.

Meeting adjournment
Emily Labone Johnson

Councilperson Jones offered the following announcements/communications:

- Fourth District Townhall meeting will be held Thursday, February 5, 2015 at Kelly Park at 6 p.m.

- Valentine's Day Social will be held Thursday, February 12, 2015 at the Dollarhide Community Center.

- Congratulated Senator Hall III on his election to the California State Senate.

Mayor Brown offered the following announcements/communications:

- Announced that today marks the 145th anniversary of the ratification of the 15th Amendment.

- Expressed her gratitude to all the staff members that contributed to the success of Senator Isadore Hall's Swearing-In Ceremony.

- Commented on the success of CCUNAT's Human Trafficking Symposium held over the weekend.

- Affordable Healthcare Enrollment event will be held Saturday, February 7, 2015 at Greater Zion Church from 10 a.m. to 3 p.m.

- Swearing-In Ceremony & Gospel Concert for Assemblyman Gipson will be held Saturday, February 7, 2015 at Southside Bethel Baptist Church. For more information email Keara Joe at Keara.joe@asm.ca.gov or call (310) 223-1201.

- Saint Timothy's Episcopal Church will be presenting a "Valentines Luncheon" event to be held Saturday, February 14, 201 from 2 p.m. to 6 p.m. For more information please call (310) 638-6319.

- Made comments in reference to President Barack Obama's State of the Union Address and 2016 fiscal year budget properly deemed "The Blueprint for Middle-Class Economics."

Resident Concerns
Street crossing lights are out on Central and Reed Street near the CVS pharmacy
Fix the potholes on Poplar and Tajuata (near Tibby Elementary school)
Timeline for the city-wide lighting assessment

#1.

ADJOURNMENT

On motion by Galvan, seconded by Arceneaux, the meeting was adjourned at 5:57 p.m. in memory of **Emily Lavonne Johnson**, by the following vote on roll call:

AYES: Council Members - Galvan, Arceneaux, Jones, Brown
NOES: Council Members - None
ABSENT: Council Members - Zurita

_____ _____

City Clerk of the City of Compton **Mayor of the City of Compton**

RESOLUTION SIGN-OFF FORM

DEPARTMENT: **City Treasurer**

RESOLUTION TITLE: **City Treasurer's Investment Report for December 2014**

<ManagersName> **<ManagersDate>**
DEPARTMENT MANAGER'S SIGNATURE DATE

REVIEW / APPROVAL

<LegalName> **<LegalDate>**
CITY ATTORNEY DATE

<ControllerName> **<ControllerDate>**
CITY CONTROLLER DATE

<CityManager> **<CityManagerDate>**
CITY MANAGER DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.

DATE: FEBRUARY 17, 2015

TO: MAYOR AND COUNCIL MEMBERS

FROM: CITY TREASURER

SUBJECT: INVESTMENT REPORT

IN ORDER TO COMPLY WITH STATE LAW AND THE CITY'S INVESTMENT POLICY, THE ATTACHED REPORT ACCURATELY REFLECTS ALL POOLED INVESTMENTS HELD ON BEHALF OF THE CITY AND SUCCESSOR AGENCY AS OF DECEMBER 31, 2014.

DOUGLAS SANDERS
CITY TREASURER

This report reflects all pooled investments in conformity with the investment policy adopted by the City Council (Gov Code 53646(b) (3)). The monthly investment report must state the ability of the agency to meet its expenditure requirements for the next six months or provide an explanation of why sufficient cash funds may or may not be available. The investment program SHOULD provide sufficient cash to meet six months of estimated expenditures, there should be sufficient cash available. In July 2014 the City completed another TRAN's transaction of approximately $12 million, the balance of which due in June 2015. As of December 31, 2014 the City had an estimated total in the General City Bank account plus LAIF accounts of $20.4 million. At the time of this report approximately $4.3 million in outstanding warrants to be paid to vendors. Our PERS balance as of this report is approximately $7.8 million. Interest rates continue to be very low due to the Fed Fund rate being below ¼ of 1% or .25%. The City of Compton's next property tax revenue is in December 2014 and January 2015, with the majority going towards the reduction of the TRAN's and our PERS account. The approximate TRANS balance to draw funds from is a little over $3.2 million with two L A SHERIFFS warrants to be released just over $3 million, this should reduce the overall balance to Two Hundred Thousand plus. Our City over the last 3 years has continued in meeting its obligations to the venders on payments, credit is due to the efforts of Management and The City Controller office as well as The Treasurer office for the success of our City.

The pricing of securities is done by Union Bank and Interactive Data Services. Moody Investor Service rates the State Pool Accounts AAA.

#2.

CITY OF COMPTON
Portfolio Management
Portfolio Summary
December 31, 2014

City of Compton
205 S. Willowbrook Ave.
Compton, CA 90220
(310)605-5515

Investments	Par Value	Market Value	Book Value	% of Portfolio	Term	Days to Maturity	YTM 360 Equiv.	YTM 365 Equiv.
Passbook/Checking Accounts -2	706,615.73	706,615.73	706,615.73	2.47	1	1	0.114	0.116
Local Agency Investment Funds	27,798,176.86	27,798,176.86	27,798,176.86	97.10	1	1	0.238	0.242
Managed Pool & Money Market Account	124,239.02	124,239.02	124,239.02	0.43	1	1	0.148	0.150
Investments	**28,629,031.61**	**28,629,031.61**	**28,629,031.61**	**100.00%**	**1**	**1**	**0.235**	**0.238**

Total Earnings	December 31 Month Ending	Fiscal Year To Date
Current Year	6,135.12	35,520.16
Average Daily Balance	**28,832,174.82**	**29,521,401.88**
Effective Rate of Return	**0.25%**	**0.24%**

This report reflects all pooled investments in conformity with the investment policy adopted by the City Council (Gov Code 53646(b) (3)). The monthly investment report must state the ability of the agency to meet its expenditure requirements for the next six months or provide an explanation of why sufficient cash funds may or may not be available. The investment program SHOULD provide sufficient cash to meet six months of estimated expenditures, there should be sufficient cash available. In July 2014 the City completed another TRAN's transaction of approximately $12 million, the balance of which due in June 2015. As of December 31, 2014 the City had an estimated total in the General City Bank account plus LAIF accounts of $20.4 million. At the time of this report approximately $4.3 million in outstanding warrants to be paid to vendors. Our PERS balance as of this report is approximately $7.8 million. Interest rates continue to be very low due to the Fed Fund rate being below ¼ of 1% or .25%. The City of Compton's next property tax revenue is in December 2014 and January 2015, with the majority going towards the reduction of the TRAN's and our PERS account. The approximate TRANS balance to draw funds from is a little over $3.2 million with two L A SHERIFFS warrants to be released just over $3 million, this should reduce the overall balance to Two Hundred Thousand plus. Our City over the last 3 years has continued in meeting its obligations to the venders on payments; credit is due to the efforts of Management and The City Controller's Office as well as to The Treasurer's Office for the success of our City.
The pricing of securities is done by Union Bank and Interactive Data Services. Moody Investor Service rates the State Pool Accounts AAA.

Treasury Rates as of 12/31/14
3 month T-Bill @ 0.0100%
6 month T-Bill @ 0.0710%
1 year T-Bill @ 0.2130%

2-2-15

DOUGLAS SANDERS, CITY TREASURER

CITY OF COMPTON
Portfolio Management
Portfolio Details - Investments
December 31, 2014

CUSIP	Investment #	Issuer	Average Balance	Purchase Date	Par Value	Market Value	Book Value	Stated Rate	YTM 360	YTM 365	Days to Maturity	Maturity Date
Passbook/Checking Accounts -2												
5007	5007	Family Self Sufficiency			401,057.05	401,057.05	401,057.05	0.090	0.089	0.090	1	
4000	4000	Neighborhood Improvement			305,558.68	305,558.68	305,558.68	0.150	0.148	0.150	1	
		Subtotal and Average	**706,548.40**		**706,615.73**	**706,615.73**	**706,615.73**		**0.114**	**0.116**	**1**	
Local Agency Investment Funds												
6000	6000	General City			7,365,082.93	7,365,082.93	7,365,082.93	0.242	0.238	0.242	1	
6011	6011	SA Low Cost Housing			177,358.41	177,358.41	177,358.41	0.242	0.238	0.242	1	
6029	6029	Measure R			2,659,462.14	2,659,462.14	2,659,462.14	0.242	0.238	0.242	1	
6019	6019	EDA Revolving Loan			436,554.90	436,554.90	436,554.90	0.242	0.238	0.242	1	
6002	6002	Prop C			5,091,698.48	5,091,698.48	5,091,698.48	0.242	0.238	0.242	1	
6030	6030	PROP A			1,317,206.65	1,317,206.65	1,317,206.65	0.242	0.238	0.242	1	
6027	6027	River Mountain Conservancy			11,760.07	11,760.07	11,760.07	0.242	0.238	0.242	1	
6007	6007	Successor Agency General			10,564.43	10,564.43	10,564.43	0.242	0.238	0.242	1	
6003	6003	Sewer Bond Proceeds			828,752.03	828,752.03	828,752.03	0.242	0.238	0.242	1	
6022	6022	Regional Park			2,741,468.65	2,741,468.65	2,741,468.65	0.242	0.238	0.242	1	
2100	6021	Retirement Fund			7,158,268.17	7,158,268.17	7,158,268.17	0.242	0.238	0.242	1	
		Subtotal and Average	**28,001,402.67**		**27,798,176.86**	**27,798,176.86**	**27,798,176.86**		**0.238**	**0.242**	**1**	
Managed Pool & Money Market Account												
5004	5004	Formal Assurance Prg Money Mkt			123,706.12	123,706.12	123,706.12	0.150	0.148	0.150	1	
5005	5005	Rental Rehab Prg Money Market			202.96	202.96	202.96	0.060	0.059	0.060	1	
5003	5003	Residential Rehab Money Market			329.94	329.94	329.94	0.040	0.039	0.040	1	
		Subtotal and Average	**124,223.75**		**124,239.02**	**124,239.02**	**124,239.02**		**0.148**	**0.150**	**1**	
		Total and Average	**28,832,174.82**		**28,629,031.61**	**28,629,031.61**	**28,629,031.61**		**0.235**	**0.238**	**1**	

#2.

CITY OF COMPTON
BANK ACCOUNT BALANCES AS OF
DECEMBER 31, 2014

FUND #	NAME OF ACCOUNT	BANK NAME	BALANCE
101	PAYROLL	WELLS FARGO BANK	491,542.27
1001	GENERAL CITY ACCOUNT	BANK OF THE WEST	8,558,337.13
1520	MEASURE R	BANK OF THE WEST	220,725.05
2000	PROP A	BANK OF THE WEST	452,457.80
4000	SA GENERAL	BANK OF THE WEST	2,171,541.05
2100	PERS	BANK OF THE WEST	5,442,379.65
1203	SA LOW COST HOUSING	BANK OF THE WEST	0.00
9203	PUBLIC FINANCE AUTHORITY	BANK OF THE WEST	179,145.40
1001	COC - REGIONAL PARK	BANK OF THE WEST	963.80
2820	COC - FAMILY SELF SUFFICIENCY	BANK OF THE WEST	401,057.05
2754-84-85	JTPA - CAREERLINK	BANK OF THE WEST	100,027.84
2805	HOME LOAN PROGRAM	BANK OF THE WEST	188,427.66
2818	SECTION 108 - HUD FUND	BANK OF THE WEST	2,376,930.78
1022	POLICE DRUG PROPERTY FORFEITURE	BANK OF THE WEST	3,184.06
5116	BOND SEWER CONSTRUCTION FUND	BANK OF THE WEST	8,328.40
6400	LIABILITY	BANK OF THE WEST	124,702.22
1001	COC - CHANGE FUND	BANK OF THE WEST	177.00

CITY OF COMPTON
BANK ACCOUNT BALANCES AS OF
DECEMBER 31, 2014

FUND #	NAME OF ACCOUNT	BANK NAME	BALANCE
1900	PROP C	BANK OF THE WEST	511,374.81
6300	WORKERS COMP	BANK OF THE WEST	106,266.89
2820	HOUSING AUTHORITY	BANK OF THE WEST	413,197.96
1001	EMERGENCY MEDICAL SERVICES COC	BANK OF THE WEST	642,880.17
1061	COPS GRANT WEED AND SEED	BANK OF THE WEST	4,008.11
1001	COC PARKING VIOLATIONS	BANK OF THE WEST	275,619.49
1001	COC UTILITIES BILLINGS	BANK OF THE WEST	1,371,045.76

February 17, 2015

TO: **MAYOR AND CITY COUNCIL MEMBERS**

FROM: **GLEN W.C. KAU, DIRECTOR OF PUBLIC WORKS/MUNICIPAL UTILITIES**

SUBJECT: **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO SIGN THE CERTIFICATE OF ACCEPTANCE DOCUMENT TO ACCEPT THE TRANSFER AND CONVEYANCE FROM THE COUNTY SANITATION DISTRICT NO. 2 OF LOS ANGELES COUNTY OF THE STATE OF CALIFORNIA (DISTRICT) OF THE SEWER FACILITIES AS DETAILED ON DISTRICT DRAWING NO. JO.p-0438 IN THE CITY OF COMPTON FOR FUTURE OPERATION, MAINTENANCE, REPAIR AND IMPROVEMENT**

SUMMARY

A resolution of the City Council of the City of Compton authorizing the City Manager to sign the Certificate of Acceptance document to accept the transfer and conveyance from the County Sanitation District No. 2 of Los Angeles County of the State of California (District) of the sewer facilities as detailed on district drawing no. JO.p-0438 in the City of Compton for future operation, maintenance, repair and improvement.

BACKGROUND

In 2003, the City of Compton was informed by the District that the existing trunk sewer located at the intersection of Long Beach Boulevard and Caldwell Street known as the Bullis Road trunk was scheduled to be removed from service due to hydrogen sulfide corrosion. A total of three (3) sewer services for three (3) parcels were affected by the decommission of the trunk sewer. Thus, the need to design an alternative sewer line and to relocate the house connections that service all affected parcels was identified by the District.

The City has historically relied on the District's design services to meet its engineering needs. An online service request was placed with the District authorizing it to proceed with the design work necessary to design an alternative sewer line and to relocate the house connections affected by the decommission of Bullis Road trunk sewer. In general, after the planning, design and construction of sewer facilities is complete an ownership transfer process follows. The ownership transfer consists of:

1. Issuance of a notarized Bill of Sale document by the District authorizing the City to accept the transfer and conveyance from the District of the sewer facilities for future operation, maintenance, repair, and improvement.
2. A Certificate of Acceptance document is prepared for signature by the City Manager.

3. Staff report and Resolution documentation is prepared by City's staff explaining the need for ownership transfer and to authorize the City Manager to sign the Certificate of Acceptance.
4. City Manager signs a notarized version of the Certificate of Acceptance and provides a copy to District to complete process.

STATEMENT OF THE ISSUE

The design and construction of a sewer facility, consisting of approximately 412 linear feet of 8-inch diameter vitrified clay pipe and appurtenant structures for the purpose of rerouting three (3) house connections to City of Compton Manhole No. 4-5-075 located at 1300 South Long Beach Boulevard and 1409 East Pauline Street, located in the City of Compton and as an extension to the existing City of Compton sewer (Sewer Map No. 4-5-4) was awarded to the District. The aforementioned activities have been completed in December 2014 by the District per attached Exhibit "A". Official ownership transfer between the District and the City needs to be completed by following the process described in the Background Section of this document.

FINANCIAL IMPACT

No funding is being requested. There are no costs associated with the ownership transfer between the parties.

ALTERNATIVE

No alternatives exist nor are recommended to transfer ownership of the sewer facility.

RECOMMENDATION

The Public Works/Municipal Utilities Department recommends the City Council authorize the City Manager to sign the Certificate of Acceptance document to accept the transfer and conveyance from the District of the sewer facilities for future operation, maintenance, repair, and ownership of the above described facility.

GLEN W.C. KAU, P.E., DIRECTOR
PUBLIC WORKS/MUNICIPAL UTILITIES

APPROVED FOR FORWARDING:

JOHNNY FORD
CITY MANAGER

ATTACHMENTS:

- Exhibit "A" Proposed sewer joint outfall "G" unit 8 trunk sewer connection relocation.
- Bill of Sale by the County Sanitation District No. 2 of Los Angeles County.
- Certificate of Acceptance by City of Compton
- District Drawing JO-p-0438

RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO SIGN THE CERTIFICATE OF ACCEPTANCE DOCUMENT TO ACCEPT THE TRANSFER AND CONVEYANCE FROM THE COUNTY SANITATION DISTRICT NO. 2 OF LOS ANGELES COUNTY OF THE STATE OF CALIFORNIA (DISTRICT) OF THE SEWER FACILITIES AS DETAILED ON DISTRICT DRAWING NO. JO.p-0438 IN THE CITY OF COMPTON FOR FUTURE OPERATION, MAINTENANCE, REPAIR AND IMPROVEMENT

WHEREAS, in 2003 the City of Compton was informed by the County Sanitation District No.2 of Los Angeles County of the State of California (District) that the existing trunk sewer located at the intersection of Long Beach Boulevard and Caldwell Street known as the Bullis Road trunk was scheduled to be taken out of service due to hydrogen sulfide corrosion; and

WHEREAS, a total of three (3) sewer services for three (3) parcels were affected by the decommission of the trunk sewer; and

WHEREAS, the need to design an alternative sewer line and to relocate the house connections that service all affected parcels was identified by the District; and

WHEREAS, the City has historically relied on the District's design services to meet its engineering needs; and

WHEREAS, an online service request was placed with the District authorizing it to proceed with the design work necessary to design an alternative sewer line and to relocate the house connections affected by the decommission of Bullis Road trunk; and

WHEREAS, after the planning, design and construction of sewer facilities is complete an ownership transfer process follows; and

WHEREAS, the ownership transfer consists of:

1. Issuance of a notarized Bill of Sale document by the District authorizing the City to accept the transfer and conveyance from the District of the sewer facilities for future operation, maintenance, repair, and improvement.
2. A Certificate of Acceptance document is prepared for its signature by the City Manager.
3. Staff report and Resolution documentation is prepared by City's staff explaining the need for ownership transfer and to authorize the City Manager to sign the Certificate of Acceptance.
   City Manager signs a notarized version of the Certificate of Acceptance and provides a copy to District to complete process; and

WHEREAS, the design and construction of a sewer facility, consisting of approximately 412 linear feet of 8-inch diameter vitrified clay pipe and appurtenant structures for the purpose of rerouting three (3) house connections to City of Compton Manhole No. 4-5-075 located at 1300 South Long Beach Boulevard and 1409 East Pauline Street, located in the City of Compton and as an extension to the existing City of Compton sewer (Sewer Map No. 4-5-4) was awarded to the District; and

WHEREAS, all design and construction activities have been completed by the District per attached Exhibit "A"; and

#3.

WHEREAS, the Public Works/Municipal Utilities Department recommends the City Council authorize the City Manager to sign the Certificate of Acceptance document to accept the transfer and conveyance from the District of the sewer facilities for future operation, maintenance, repair, and improvement.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COMPTON DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. That the City does hereby requests the County Sanitation District No.2 of Los Angeles County of the State of California (District) to transfer and convey the sewer facility as depicted on District Drawing No. JO-p-0438 on file with the District.

SECTION 2. That the City Manager is hereby authorized to sign the Certificate of Acceptance document to accept the transfer and conveyance from the District of the sewer facilities for future operation, maintenance, repair, and improvement.

SECTION 3. That a certified copy of this Resolution shall be filed in the offices of the City Manager, City Controller, City Attorney, City Clerk and the Public Works/Municipal Utilities Department.

SECTION 4. That the Mayor shall sign and the City Clerk shall attest to the adoption of this Resolution.

ADOPTED this ___ day of _____, 2015.

_____
MAYOR OF THE CITY OF COMPTON

ATTEST:

_____
CITY CLERK OF THE CITY OF COMPTON

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF COMPTON: ss

I, Alita Godwin, City Clerk of the City of Compton, hereby certify that the foregoing Resolution was adopted by the City Council, signed by the Mayor and attested by the City Clerk at a regular meeting thereof held on the ___ day of _____, 2015.

That said Resolution was adopted by the following vote, to wit:

AYES: COUNCIL MEMBERS-
NOES: COUNCIL MEMBERS-
ABSENT: COUNCIL MEMBERS-
ABSTAIN: COUNCIL MEMBERS-

_____
CITY CLERK OF THE CITY OF COMPTON

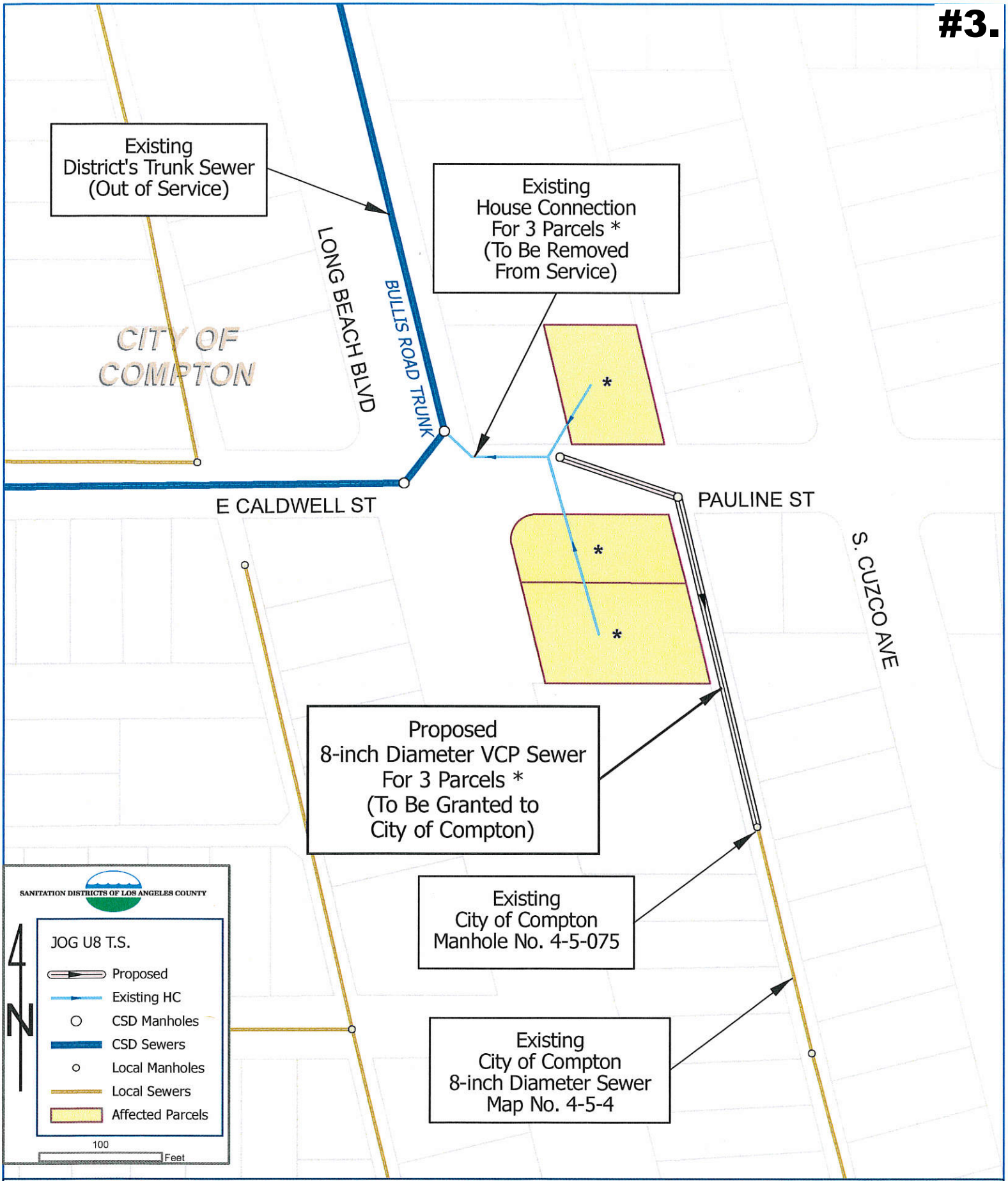


EXHIBIT "A"
PROPOSED SEWER
JOINT OUTFALL "G" UNIT 8 TRUNK SEWER CONNECTION RELOCATION

COUNTY SANITATION DISTRICT NO. 2 OF LOS ANGELES COUNTY

GRACE ROBINSON CHAN - (ENGINEER & GENERAL MANAGER

Map prepared for The Sanitation Districts of L.A. County, Sewer Design Section, by Dennis Conrad - NAD_1983_StatePlane_California_V_FIPS_0405_Feet - Printed : Thursday, May 16, 2013.

#3.

RECORDING REQUESTED BY:
COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY
1955 WORKMAN MILL ROAD
P.O. BOX 4998
WHITTIER, CA 90607-4998

WHEN RECORDED, MAIL TO ABOVE ADDRESS

ATTN: WILLIAM ROGGENKAMP
FACILITIES PLANNING DEPARTMENT

BILL OF SALE

For good and valuable consideration, receipt of which is hereby acknowledged, **County Sanitation District No. 2 of Los Angeles County** a county sanitation district organized and existing under the provisions of the County Sanitation District Act, Health & Safety Code Section 4700 *et seq.*, grants to **CITY OF COMPTON**, the following described property:

A sewer facility, consisting of approximately 412 linear feet of 8-inch diameter vitrified clay pipe and appurtenant structures for the purpose of rerouting a house connection to City of Compton Manhole No. 4-5-075 located at 1300 South Long Beach Boulevard and 1409 East Pauline Street, located in the City of Compton and as an extension to the existing City of Compton sewer (Sewer Map No. 4-5-4). Details of which are shown on District Drawing No. JO-p-0438, Sheet C-1.

COUNTY SANITATION DISTRICT NO. 2
OF LOS ANGELES COUNTY

By: _____
Nikos Melitas
Supervising Engineer

(Signature to be notarized)

Bill of Sale No. 42

Name of Sewer: Joint Outfall "G" Unit 8 TS Connection Relocation

DOC # 2589947

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California _____

County of Los Angeles _____

On 11/25/14 (Date) before me, William Roggenkamp, Notary Public (Here Insert Name and Title of the Officer)

Personally appeared Nikos Melitas (Names(s) of Signer(s))

who proved to me on the basis of satisfactory evidence to be the person~~(s)~~ whose name~~(s)~~ is~~/are~~ subscribed to the within instrument and acknowledged to me that he~~/she/they~~ executed the same in his~~/her/their~~ authorized capacity~~(ies)~~, and that by his~~/her/their~~ signature~~(s)~~ on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Signature of Notary Public)

WILLIAM ROGGENKAMP
Commission # 2085293
Notary Public - California
Los Angeles County
My Comm. Expires Nov 4, 2018

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: Bill Of sale

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

- ☐ Individual
- ☐ Corporate Officer — Title(s): _____
- ☐ Partner — ☐ Limited ☐ General
- ☐ Attorney in Fact
- ☐ Trustee
- ☐ Guardian or Conservator
- ☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

Signer's Name: _____

- ☐ Individual
- ☐ Corporate Officer — Title(s): _____
- ☐ Partner — ☐ Limited ☐ General
- ☐ Attorney in Fact
- ☐ Trustee
- ☐ Guardian or Conservator
- ☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

City of Compton
Public Works/Municipal Utilities
205 South Willowbrook Avenue
Compton, CA 90220

Office: (310) 605-5505
Fax: (310) 605-6326

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by a _____, _____ Bill of Sale to the City of Compton, California, together with all agreements, covenants, easements, reservations, promises, and obligations contained therein, is hereby accepted and agreed to the undersigned officer, on behalf of the City Council of the City of Compton, pursuant to the authority conferred by Resolution number _____ of the City Council of the City of Compton, adopted on _____, _____.

CITY OF COMPTON

_____ _____

Johnny Ford Date

City Manager

#3.

COUNTY SANITATION DISTRICT NO. 2
OF LOS ANGELES COUNTY, CALIFORNIA

DESIGNED	M. BINA	AUG. 2013
DRAWN	E. ANDRADE	AUG. 2013
CHECKED	M. TATALOVICH	AUG. 2013
REVIEWED	J. GANZ	AUG. 2013

NO.	REVISIONS	INITIALS	DATE
1	REVISED PER AS-BUILT	MB CJH	11-5-14

PLAN & PROFILE

JOINT OUTFALL "G"
UNIT 8 TRUNK SEWER CONNECTION RELOCATION

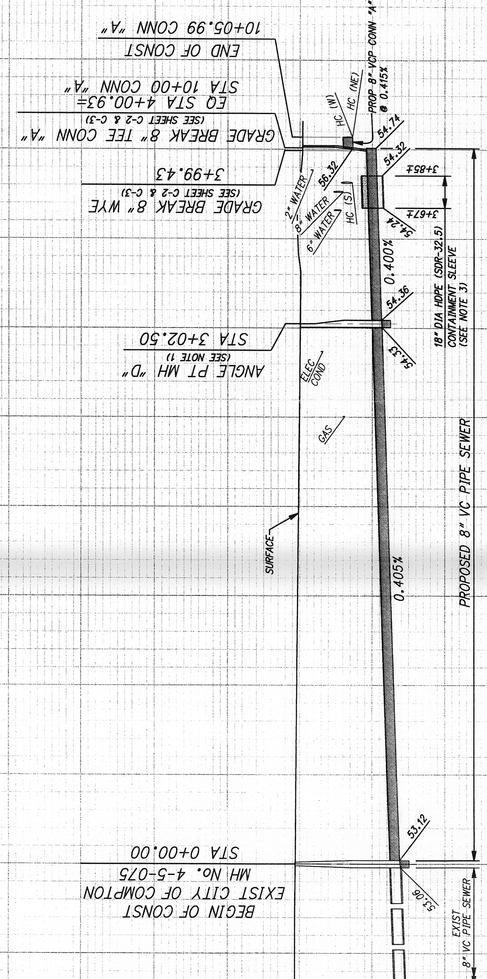
SCALE: AS SHOWN | SHEET NO. C | DWG. NO. J01-4

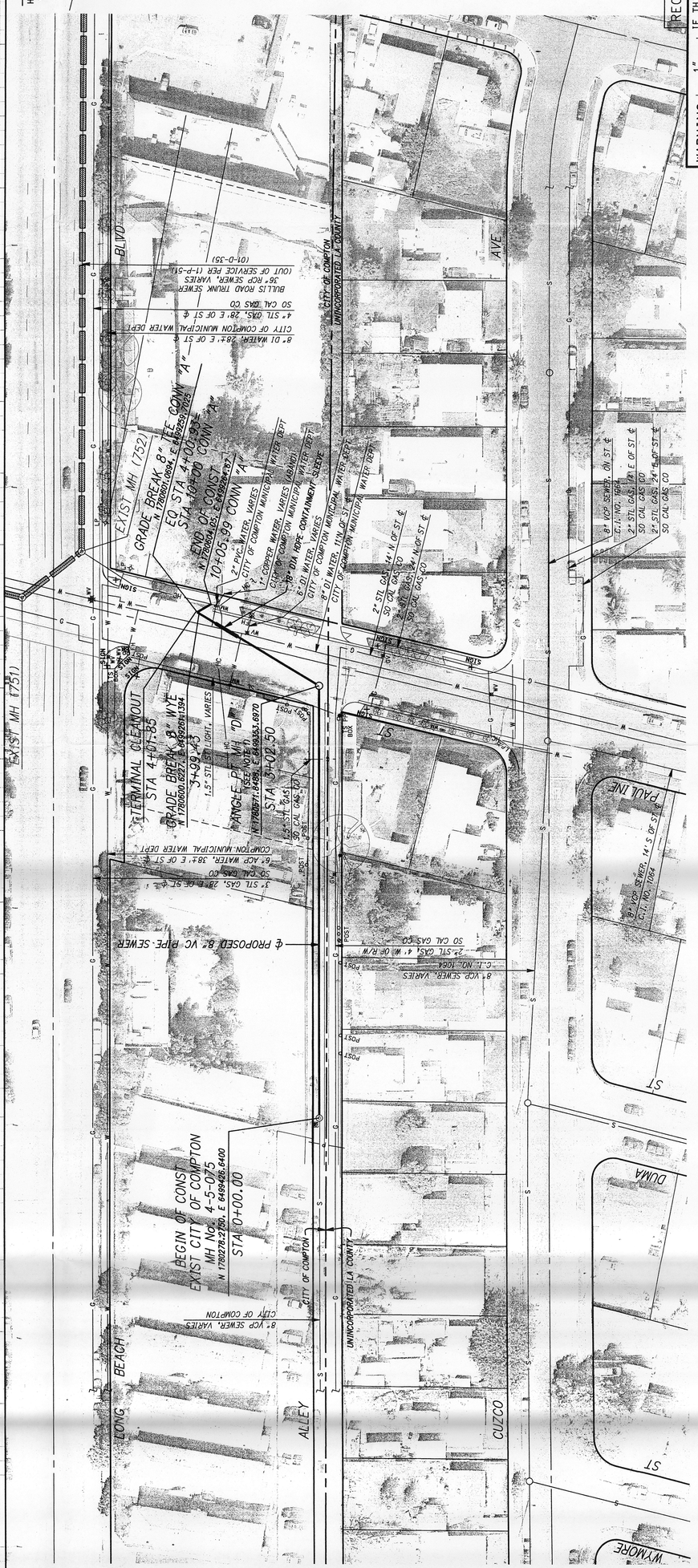
RECORD DRAWING

WARNING — 1" — IF THIS LINE IS NOT 1" LONG, THEN DWG IS NOT TO SCALE.

SCALES
HORIZ: 1" = 40'
VERT: 1" = 5'

NOTES
1. PLASTIC LINER, AS DETAILED IN ITEM 3 OF THE STANDARD DRAWING IS NOT REQUIRED.
2. TEMPORARY PIPE SUPPORT SHALL BE PER STD. DWG. S-c-222, PERMANENT PIPE SUPPORT SHALL BE PER S-c-217 FOR ALL PIPES/CONDUITS 8" DIAMETER AND LARGER.
3. THE CONTAINMENT SLEEVE SHALL BE AN 18-FOOT LONG, SEAMLESS, HIGH-DENSITY, POLYETHYLENE PIPE (HDPE), DESIGNED, MANUFACTURED, AND TESTED IN ACCORDANCE WITH THE LATEST EDITION OF ASTM F714. ANNULAR SPACE SHALL BE GROUTED WITH 2-SACK CEMENT SAND SLURRY.
4. BACKFILL ABOVE SLEEVE WITH 2-SACK SLURRY





RESOLUTION SIGN-OFF FORM

DEPARTMENT: **Public Works-Engineering**

RESOLUTION TITLE: **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO SIGN THE CERTIFICATE OF ACCEPTANCE DOCUMENT TO ACCEPT THE TRANSFER AND CONVEYANCE FROM THE COUNTY SANITATION DISTRICT NO. 2 OF LOS ANGELES COUNTY OF THE STATE OF CALIFORNIA (DISTRICT) OF THE SEWER FACILITIES AS DETAILED ON DISTRICT DRAWING NO. JO.p-0438 IN THE CITY OF COMPTON FOR FUTURE OPERATION, MAINTENANCE, REPAIR AND IMPROVEMENT**

Glen Kau	**2/3/2015 3:53:42 PM**
DEPARTMENT MANAGER'S SIGNATURE	DATE

REVIEW / APPROVAL

Ruth Rugley	**2/4/2015 3:57:28 PM**
CITY ATTORNEY	DATE
Stephen Ajobiewe	**2/4/2015 10:59:29 AM**
CITY CONTROLLER	DATE
Johnny Ford	**2/3/2015 8:44:37 PM**
CITY MANAGER	DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.

February 17, 2015

TO: **HONORABLE MAYOR AND COUNCIL MEMBERS**

FROM: **STEVE MASURA, DIRECTOR**
PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT

SUBJECT: **BICYCLE MASTER PLAN – ANNOUNCEMENT OF COMMUNITY MEETING ON MARCH 11, 2015, 7:00 PM, AT CITY COUNCIL CHAMBERS (No Fiscal Impact)**

SUMMARY:

The Planning and Economic Development Department is pleased to announce the beginning of the process to prepare the city's first citywide Bicycle Master Plan with a community workshop to take place at the regular Planning Commission meeting on March 11, 2015 at 7:00 pm in the Council Chambers.

BACKGROUND:

The city currently does not have a comprehensive citywide bicycle plan. The city has some bikeways on a few arterial streets as well as the Compton Creek Bike Path. There are significant missing gap connections for bikeways throughout the city and notably none that connect directly to the Blue Line transit stations.

A Bicycle Master Plan is needed to complete the bikeway network in the city and to use the plan to guide street improvements with bikeways as streets are re-paved or re-constructed. The Bicycle Master Plan will also serve as a very important tool to guide the city's Capital Improvement Program and to make the city more eligible and competitive for the many different grant funding sources available. The goal is to have the Bicycle Master Plan completed by May 2015 in order to have a stronger application specifically for the Caltrans Active Transportation (ATP) grant which has an application deadline in May 2015. Such grant funds will provide additional financial sources and leveraging to all needed street improvement projects.

The other equally important goals and purposes for a Bicycle Master Plan include:

- To improve overall multi-modal mobility (i.e. for a more viable and lower cost alternative transportation mode through non-motorized means such as bicycling);
- To improve bicycle and pedestrian safety;
- To encourage healthy activity alternatives;
- To improve recreational bicycling activity;

- To coordinate with all city efforts for Safe Routes to Schools and "Complete Streets" improvements;
- Provide a clear plan and cost estimates for bikeway improvements that can be included in the Capital Improvement Plan; and
- To support overall transit oriented development efforts at the city's two Blue Line transit station areas.

It is staff's intention to also have this Bicycle Master Plan effort evaluate the feasibility for a bike sharing program.

The process will include outreach to the community and bicycling advocates/stakeholders, an online survey, a community workshop, and then final review and adoption by the City Council. The community workshop on March 11th will provide an overview of bicycle master plan elements and a proposed bikeway network for the city. Input and comments will be received and incorporated into a final plan.

The Planning and Economic Development Department will be working with a consulting firm that specializes in bike planning, Alta Planning & Design (Alta). Alta has worked on or completed numerous bicycle plans nationally, and for many nearby agencies such as the Southbay Council of Governments, the County of Los Angeles, and Long Beach, and is currently working on the plans for the adjacent cities of Bellflower and Paramount.

RECOMMENDATION:

1. Receive and file.

Steve Masura
Planning and Economic Development

APPROVED FOR FORWARDING:

JOHNNY FORD
CITY MANAGER

RESOLUTION SIGN-OFF FORM

DEPARTMENT: **City Management**

RESOLUTION TITLE: **REPORT ON GRAFFITI REMOVAL SERVICES PERFORMED BY URBAN GRAFFITI**

<ManagersName> **<ManagersDate>**
DEPARTMENT MANAGER'S SIGNATURE DATE

REVIEW / APPROVAL

<LegalName> **<LegalDate>**
CITY ATTORNEY DATE

<ControllerName> **<ControllerDate>**
CITY CONTROLLER DATE

<CityManager> **<CityManagerDate>**
CITY MANAGER DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.

RESOLUTION SIGN-OFF FORM

DEPARTMENT: **City Management**

RESOLUTION TITLE: **REPORT BACK ON THE COSTS OF THE COMPTON CHRISTMAS PARADE 2014**

<ManagersName> — DEPARTMENT MANAGER'S SIGNATURE

<ManagersDate> — DATE

REVIEW / APPROVAL

<LegalName> — CITY ATTORNEY

<LegalDate> — DATE

<ControllerName> — CITY CONTROLLER

<ControllerDate> — DATE

<CityManager> — CITY MANAGER

<CityManagerDate> — DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.

February 17, 2015

TO: **MAYOR AND COUNCIL MEMBERS**

FROM: **JON THOMPSON, CHIEF**
COMPTON FIRE DEPARTMENT

SUBJECT: **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO AMEND THE AGREEMENT WITH ROBERT KEYES FOR PROJECT MANAGEMENT SERVICES ON THE CITY-WIDE CAMERA SURVEILLANCE PROJECT AND ISSUE A PURCHASE ORDER IN THE AMOUNT OF $50,000**

SUMMARY

This resolution authorizes the City Manager to amend the professional services contract with Robert Keyes to extend the term of the agreement for 12-months and provide for additional compensation for continued project management on City-wide Camera Surveillance Project and issue a purchase order in the amount of $50,000.

BACKGROUND

The City is currently in the process of installing cameras city-wide to assist law enforcement with its efforts to eliminate crime, vandalism and graffiti. All parks have been completed and the City is rapidly moving forward to complete the final phase of this City-wide project.

Robert Keyes has provided project management services to oversee the entire camera project to date. Mr. Keyes is a retired police officer for the City of Clovis, California. He served in all ranks prior to his retirement, including that of Interim Chief of Police. He conceptualized, designed and developed a city-wide 200 camera surveillance system for Clovis.

Mr. Keyes experience has proved invaluable on Compton's parks and City-wide camera projects in keeping the vendors on target with minimal change orders and coming on time with the various phases. The relationships he has built with the state, county, Union Pacific Railroad and manufacturers will benefit the City from this point forward. His guidance has saved the City monies which can be used to enhance the project in other ways.

STATEMENT OF ISSUE

The City currently has an agreement with Mr. Keyes for project management services on the City-wide Camera Surveillance Project. He works on an hourly basis and the first purchase order has been depleted, however the project is not complete. We currently owe him funds and have estimated what we will owe him thru the completion of the project.

We also would like to have him complete a Request for Proposals/Bids for a maintenance agreement for the system once it is up and running.

The City has also embarked on a traffic management camera system. Mr. Keyes has been and continues to be instrumental in helping the Public Works Engineering Division move that project forward. Due to his familiarity with these projects and his personal experience, we are confident that this project can get under way with little to no delays. Contracting with Mr. Keyes has saved the City approximately $25 per hour or twenty-five percent of the past cost for project management associated with this project. The hourly rate is $75 per hour; therefore, we are requesting $50,000. He will continue to be responsible for the oversight of the vendors on behalf of the City as the City has no one on staff with expertise in this area. Mr. Keyes will continue to assist the Fire Chief in the administrative functions of this project as well.

ANALYSIS/ALTERNATIVE

Contract with a consulting firm at a higher cost would be a waste of funds that could be used to enhance the project at hand. To search for another project manager would cause delays and necessitate educating a new project manager on the design and construction of our system infrastructure, thus slowing the progress of the project.

FISCAL IMPACT

Funds for this request ($50,000) are allocated in the Fire Department Account No. 3030-690-000-4334 of the FY 2014/15 budget.

RECOMMENDATION

Staff recommends that Council approve the attached Resolution.

JON THOMPSON, CHIEF
COMPTON FIRE DEPARTMENT

APPROVED TO FORWARD:

JOHNNY FORD
CITY MANAGER

RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO AMEND THE AGREEMENT WITH ROBERT KEYES FOR PROJECT MANAGEMENT SERVICES ON THE CITY-WIDE CAMERA SURVEILLANCE PROJECT AND ISSUE A PURCHASE ORDER IN THE AMOUNT OF $50,000

WHEREAS, the City Council has approved the development and construction of a City-wide Camera Surveillance Project; and

WHEREAS, project management of such project requires use of an experienced and qualified subject matter expert who can ensure proper development of this system; and

WHEREAS, the City currently contracts with Robert Keyes, who has been providing project management services on the parks and City-wide camera projects to date; however, the project has not been completed, thus it is necessary to amend the contract to extend the term and provide additional compensation; and

WHEREAS, funds for these services are allocated in the Fire Department's 2014/15 Fiscal Year budget.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COMPTON DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That the City Manager is hereby authorized amend the professional services agreement with Robert Keyes for the continued provision of project management services on the City-wide Camera Surveillance Project.

Section 2. That the amended agreement shall extend the term of the agreement for a period of twelve (12) months, commencing on January 1, 2015 and shall provide additional compensation in an amount not to exceed Fifty Thousand Dollars ($50,000.00).

Section 3. That a purchase order is authorized to be issued in the amount of Fifty Thousand Dollars ($50,000.00) for services rendered.

Section 4. That funds for these services are allocated in the Fire Department's 2014-2015 Fiscal Year budget in Account No. 3030-690-000-4334**.**

Section 5. That a certified copy of this Resolution shall remain be filed with the offices of the City Manager, City Controller, City Attorney, City Clerk and the Fire Department.

Section 6. That the Mayor shall sign and the City Clerk shall attest to the adoption of this Resolution.

ADOPTED this ___ day of _____, 2015.

_____

MAYOR OF THE CITY OF COMPTON

ATTEST:

_____
CITY CLERK OF THE CITY OF COMPTON

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF COMPTON: ss

I, Alita Godwin, City Clerk of the City of Compton, do hereby certify that the forgoing Resolution was adopted by the City Council, signed by the Mayor, and attested to by the City Clerk at a regular meeting thereof held on ___ day of _____, 2015.

That said Resolution was adopted by the following vote, to wit:

AYES: **Council Members-**
NOES: **Council Members-**
ABSTAINS: **Council Members-**
ABSENT: **Council Members–**

_____
CITY CLERK OF THE CITY OF COMPTON

AMENDMENT
TO
PROFESSIONAL SERVICES AGREEMENT
BETWEEN
CITY OF COMPTON
AND
ROBERT KEYES

This **AMENDMENT** is entered into by and between the **CITY OF COMPTON,** a municipal corporation of the State of California (hereinafter referred to as **"CITY"**) and **ROBERT KEYES** (hereinafter referred to as **"CONSULTANT"**).

RECITALS

WHEREAS, the City of Compton is in the process of installing an advance surveillance and protection system in City parks and throughout the City limits to assist law enforcement's efforts to eliminate crime, vandalism and graffiti; and

WHEREAS, pursuant to Resolution No. 23,720, adopted by the City Council on March 19, 2013, the City employed the services of the Consultant (Robert Keyes), a qualified and experienced consultant to provide project management and administrative guidance for the proper development and implementation of the City's advance surveillance and protection system; and

WHEREAS, pursuant to the terms of the contract, it was anticipated that the Consultant's services may be able to be completed within 640 hours from commencement of the services; however, installation of the system has not been completed, thus necessitating continuation of the Consultant's services; and

WHEREAS, there is a need to amend the contract to extend the term of the contract and increase the contract price in order to complete the Project; and

WHEREAS, by Resolution No. _____, adopted on the __ day of _____, 2015, the City Council authorized the City Manager to amend the contract with Robert Keyes to extend the term of the contract and increase the contract price.

NOW, THEREFORE, the parties do hereby mutually agree to amend the Professional Services Agreement as follows:

AMENDMENTS

1. The parties agree to amend **Section 2 – Duration of Contract** of the original Agreement to extend the duration of the contract for a term of 12-months, commencing on January 1, 2015, unless the original Agreement and this amendment thereto is terminated as provided for within the original Agreement.

2. The parties agree to amend **Section 3 – Compensation** of the original Agreement to provide for additional compensation for the completion of the services to be provided, as more fully described within the original Agreement, in the amount of

Fifty Thousand Dollars ($50,000.00), payable at the rate of Seventy Five Dollars ($75.00) per hour.

3. Except as provided for above, all other terms and conditions of the original Professional Services Agreement and any amendments thereto between the City and the Consultant all remain in effect.

IN WITNESS WHEREOF, the authorized representatives of the parties have executed this **AMENDMENT** to the above-identified **PROFESSIONAL SERVICES AGREEMENT.**

ROBERT KEYES/CONSULTANT

By _____ **Dated: _____**
Robert Keyes

CITY OF COMPTON
Recommended for Approval:

By _____ **Dated: _____**
Jon Thompson, Chief
Compton Fire Department

Approved by:

Dated: _____ **By _____**
Johnny Ford, City Manager

Approved as to form:

By _____ **Dated: _____**
Craig J. Cornwell, City Attorney

ATTEST:

Dated: _____ **By_____**
Alita Godwin, City Clerk

RESOLUTION SIGN-OFF FORM

DEPARTMENT: **Fire Department**

RESOLUTION TITLE: **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON AUTHORIZING THE CITY MANAGER TO AMEND THE AGREEMENT WITH ROBERT KEYES FOR PROJECT MANAGEMENT SERVICES ON THE CITY-WIDE CAMERA SURVEILLANCE PROJECT AND ISSUE A PURCHASE ORDER IN THE AMOUNT OF $50,000**

Jon Thompson	**12/31/2014 10:48:20 AM**
DEPARTMENT MANAGER'S SIGNATURE	DATE

REVIEW / APPROVAL

Ruth Rugley	**2/5/2015 11:14:35 AM**
CITY ATTORNEY	DATE
Stephen Ajobiewe	**2/4/2015 11:03:06 AM**
CITY CONTROLLER	DATE
Johnny Ford	**2/3/2015 8:53:00 PM**
CITY MANAGER	DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.

February 17, 2015

TO: **HONORABLE MAYOR AND COUNCILMEMBERS**

FROM; **JOHNNY FORD**
CITY MANAGER

SUBJECT: **A RESOLUTION OF THE COUNCIL OF THE CITY OF COMPTON TO TERMINATE THE STATE LEGISLATIVE ADVOCACY AGREEMENT WITH STRATEGIC COUNSEL, PLC AND TO ENTER INTO AN AGREEMENT WITH THE LAW OFFICE OF ANTHONY WILLOUGHBY AND ASSOCIATES FOR THE BALANCE OF FISCAL YEAR 2014-2015**

SUMMARY

The City Council is considering a resolution to terminate the state legislative advocacy services of Strategic Counsel, PLC and to enter into an interim agreement with the Law Office of Anthony Willoughby & Associates for the balance of fiscal year 2014-2015.

The current agreement with Strategic Counsel, PLC calls for a monthly service fee of $9000, while the proposed agreement with Willoughby and Associates would call for a monthly fee of $7500. Both agreements have fifteen (15) day contract termination provisions.

BACKGROUND

For the past several years, the City has utilized the services of Strategic Counsel to provide state lobbying services and has renewed the service agreement annually. The current agreement with Strategic Counsel will expire on June 15, 2015. If this resolution is approved, Strategic Counsel would receive its notice on February 18 and services would terminate fifteen days thereafter.

STATEMENT OF ISSUE

Annually, the City of Compton engages a firm for the following State lobbying services:

- Legislative Bill Identification
- Bill Drafting
- Bill Analysis and Background Search
- Consulting on Position Determination
- Bill Tracking
- Evaluation/Analysis of Amendments

FISCAL IMPACT

There is no adverse fiscal impact to the City of Compton in approving this resolution. In fact, the City could realize a savings of approximately $5,000 in contracting for the service at a lower fee for the remainder of the fiscal year.

Funds have been allocated in the Fiscal Year 2014-2015 budget in account 1001-510-000-4218.

RECOMMENDATION
There is no recommendation from staff.

JOHNNY FORD
CITY MANAGER

RESOLUTION NO. _____

A RESOLUTION OF THE COUNCIL OF THE CITY OF COMPTON TO TERMINATE THE STATE LEGISLATIVE ADVOCACY AGREEMENT WITH STRATEGIC COUNSEL, PLC AND AUTHORIZE THE CITY MANAGER TO ENTER INTO AN AGREEMENT WITH THE LAW OFFICE OF ANTHONY WILLOUGHBY AND ASSOCIATES FOR THE BALANCE OF THE FISCAL YEAR 2014-2015

WHEREAS, the City Council is considering a resolution to terminate the State legislative advocacy services of Strategic Counsel, PLC and to enter into an agreement with the Law Office of Anthony Willoughby & Associates; and

WHEREAS, the current contract with Strategic Counsel, PLC is for a monthly payment of $9,000, while the proposed agreement with Willoughby & Associates would be for $7,500; and

WHEREAS, the Council has authorized funding for advocacy services until the end of this fiscal year; and

WHEREAS, both agreements have fifteen (15) day termination provisions; and

WHEREAS, the City of Compton engages a firm for the following State lobbying services:

- Legislative Bill Identification
- Bill Drafting
- Bill Analysis and Background Search
- Consulting on Position Determination
- Bill Tracking
- Evaluation/Analysis of Amendments

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF COMPTON DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. That the City Council does hereby approve the termination of the agreement of Strategic Counsel, PLC consistent with the agreement's termination provision and authorizes the City Manager to enter into an agreement with the Law Office of Anthony Willoughby & Associates for the balance of the fiscal year 2014-2015 for State legislative advocacy services.

SECTION 2. That funds have been allocated in the Fiscal Year 2014-2015 budget in account number 1001-510-000-4218.

SECTION 3. That a certified copy of this Resolution shall be filed in the offices of the City Manager, City Controller, City Attorney and City Clerk.

SECTION 4. That the Mayor shall sign and City Clerk shall attest to the adoption of this Resolution.

ADOPTED this ___ day of _____, 2015.

_____
MAYOR OF THE CITY OF COMPTON

ATTEST:

_____
CITY CLERK OF THE CITY OF COMPTON

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF COMPTON:ss

I, Alita Godwin, City Clerk of the City of Compton, hereby certify that the foregoing resolution was adopted by the City Council, signed by the Mayor, and attested by the City Clerk at a regular meeting thereof held on the _____ day of _____, 2015.

That said resolution was adopted by the following vote, to wit:

AYES: COUNCIL MEMBERS-
NOES: COUNCIL MEMBERS-
ABSENT: COUNCIL MEMBERS-
ABSTAIN: COUNCIL MEMBERS-

_____
CITY CLERK OF THE CITY OF COMPTON

PROFESSIONAL SERVICES AGREEMENT
BETWEEN
CITY OF COMPTON
AND
LAW OFFICES OF ANTHONY WILLOUGHBY AND ASSOCIATES
[State Lobby Services]

This **AGREEMENT** is made by and between the **CITY OF COMPTON**, a municipal corporation of the State of California (hereinafter referred to as **"CITY"**) located at 205 South Willowbrook Avenue, Compton, California 90220 and **LAW OFFICESOF ANTHONY WILLOUGHBY AND ASSOCIATES** (hereinafter referred to as **"CONSULTANT"**) located at 448 South Hill Street, Suite 1008, Los Angeles, California 90013.

RECITALS:

WHEREAS, the City has determined that legislative issues which significantly affect the City of Compton are considered and acted upon by Federal, State, regional and local legislative entities; and

WHEREAS, the City desires to engage the services of a qualified Consultant to evaluate legislation, provide legislative advocacy services and to assist in promoting the interest of the City to legislative entities considering legislation and other regulations that significantly impact the City of Compton; and

WHEREAS, Consultant (Law Offices of Anthony Willoughby and Associates) represents that it is experienced, well-connected and possesses a respected representation throughout the State; and

WHEREAS, by Resolution No. _____, adopted on the 17th day of February 2015, the City Council gave approval to award a contract to provide legislative advocacy services for Fiscal Year 2014/2015 to such Consultant; and

WHEREAS, Consultant is willing to render such professional services, as hereinafter defined, on the following terms and conditions.

NOW, THEREFORE, Consultant and City (each a "Party" and collectively, the "Parties"), for the consideration, terms and conditions herein described, mutually agree as follows:

AGREEMENT:

1. Services to be Rendered by Consultant. It is the mutual understanding of the parties that the Consultant shall perform and provide a full range of legislative advocacy and strategic public policy services, including but not limited to:

- State Administration Regulation compliance and advice
- Legislative Bill Identification
- Bill Drafting
- Bill Analysis and Background Research
- Consulting on Position Determination
- Bill Tracking

- Evaluation/Analysis of Amendments
- Amendment Drafting
- Lobbying Individual Legislators and Staff through One-On-One Meetings
- Testifying Before Legislative Committees
- Organizing Lobbying Efforts of City and Allied Organizations
- Preparing Background Materials to Support a Client's Position
- Working with Lobbying State Agency Officials and Staff
- Lobbying the Governor and his Staff

as such services are more fully described in the **"Proposal"** submitted by **CONSULTANT** and incorporated hereby.

Consultant acknowledges that in entering into this Agreement the City is relying on Consultant's special skills and experience to do and perform the services in accordance with best standards of professional practice. While performing the Services, Consultant agrees to perform all the said services and furnish all the necessary materials at its own cost and expense necessary to complete said services in a manner consistent with that degree of care and skill ordinarily exercised by members of the same profession currently practicing under similar circumstances and to the reasonable satisfaction of the City**.**

Consultant services hereunder shall be performed in good, workmanlike and professional manner. Consultant shall be responsible for correcting and completing all errors and omissions related to the services provided by the Consultant for this Agreement at no additional cost to the City**.** "Errors" and "Omissions" for purposes of this paragraph are defined to mean a failure by the Consultant to meet the standards of its profession as set forth in the preceding paragraph. The acceptance of the services by City does not release Consultant from these obligations.

Consultant will be responsible for employing or engaging all persons necessary to perform the services. All of Consultant's staff will be qualified by training and experience to perform their assigned tasks. Consultant will give its personal attention to the fulfillment of the provisions of this Agreement by all of its employees and subcontractors, if any, and will keep the services under its control. On demand of City, if any employee or subcontractor of Consultant fails or refuses to carry out the provisions of this Agreement or appears to be incompetent or to act in a disorderly or improper manner, he or she will be discharged immediately from the services.

Anthony Willoughby, Esquire of Consultant shall be primarily responsible for representing Consultant in performance of this Agreement.

2. **Duration of Contract.** The term of this Agreement shall extend from March ____, 2015 to June 30, 2015, unless this Agreement is terminated as provided herein.

3. **Compensation.** The method of payment for this Contract will be based on an agreed "lump sum" amount for completion of all services required pursuant to this Agreement and as specified within Consultant's **"Proposal"**, which is incorporated herein. The total price paid the Consultant will include compensation for all work, including travel, materials, supplies, vendor services, expenses and subcontracted work. No additional compensation will be paid to the Consultant, unless there is a change in the scope of the services or the scope of the project. In the instance of a change in the scope of service or scope of the project, adjustment to the

total compensation will be negotiated between the Consultant and the City. Adjustment in the total compensation will not be effective until authorized and approved in writing by the City**.**

Progress payments may be made in arrears based on the percentage of services and deliverables completed by the Consultant. If Consultant fails to submit the required deliverable items according to schedule or as required by the Agreement, except for those amounts that are due and not reasonably in dispute, the City shall have the right to delay payment and/or terminate this Agreement in accordance with the provisions noted herein.

Consultant shall be reimbursed within thirty (30) days, or as promptly as fiscal procedures may permit, upon receipt by the City of itemized invoices for services completed. Invoices shall be submitted no later than 45 calendar days after the performance of services for which the Consultant is billing. Invoices shall detail the services performed on each task as applicable. Invoices shall be delivered or mailed to the **City Manager** at the following address: **City of Compton, 205 South Willowbrook Avenue, Compton, California 90220.**

As full and complete compensation for performance of all the services to be performed by the Consultant pursuant to this Agreement, including expenses and other costs, City shall pay, and Consultant agrees to accept, a not-to-exceed maximum sum of **Forty Thousand Dollars ($40,000.00),** payable at the rate of $7,500.00 per month.

In the event of termination, the Consultant shall be entitled to compensation for the undisputed reasonable value of services performed to the effective date of termination, including any noncancellable obligations incurred prior to termination; provided, however, that the City may condition payment of such compensation upon the Consultant's delivery to the City of any and all City property, documents, reports, records, materials and work product associated with the performance of this Agreement.

4. **Ownership of Materials.** All product produced by Consultant or its agents, employees, and subcontractors pursuant to this Agreement (the "Work Product") is the property of City. In the event this Agreement is terminated, all Work Product produced by Consultant or its agents, employees and subcontractors pursuant to this Agreement will be delivered to City pursuant to the termination clause of this Agreement. Consultant will have the right to make one (1) copy of the Work Product for Consultant's records.

The Work Product may be used by City and its agents, employees, representatives, and assigns, in whole or in part, or in modified form, for all purposes City may deem advisable, without further employment of or payment of any compensation to Consultant; provided, however, that if this Agreement is terminated for any reason prior to completion of the Project and if under such circumstances City uses, or engages the services of and directs another consultant to use the Work Product, City agrees to hold Consultant harmless from any and all liability, costs, and expenses relative to claims arising out of matters and/or events which occur subsequent to the termination of this Agreement as a result of causes other than the fault or negligence of Consultant, or anyone for whose acts it is responsible, in preparation of the Work Product. Consultant will not be responsible for deficiencies solely attributable to modifications of the Work Product performed by others, or that arise from use of the Documents in connection with a project or site other than that shown in the Work Product.

5. **Independent Contractor Status.** Consultant, its officers, employees, subconsultants, agents and volunteers (collectively hereinafter the "Consultant"), will perform the services in Consultant's own way and pursuant to this Agreement as an independent contractor and in

pursuit of Consultant's independent calling, and not as an employee of City. The persons used by Consultant to provide the services under this Agreement will not be considered employees of City for any purposes. Neither the City nor any of its officers, employees, agents or volunteers shall have any control over the conduct of the Consultant, except as expressly set forth in this Agreement. Consultant expressly warrants that while engaged in carrying out and complying with any terms and conditions of this Agreement that Consultant shall not at any time or in any manner, represent that Consultant is in any manner officers, employees, agents or volunteers of the City. Consultant shall obtain no rights to retirement, health care or any other benefit that accrue to City officials, officers, or employees. Consultant expressly waives any claim to such rights.

The payment(s) made to Consultant pursuant to the Agreement will be the full and complete compensation to which Consultant is entitled. City will not make any federal or state tax withholdings on behalf of Consultant or its agents, employees or subcontractors. City will not pay any workers' compensation insurance, retirement contributions or unemployment contributions on behalf of Consultant or its employees or subcontractors. Consultant agrees to indemnify and pay City within thirty (30) days for any tax, retirement contribution, social security, overtime payment, unemployment payment or workers' compensation payment which City may be required to make on behalf of Consultant or any agent, employee, or contractor of Consultant for services performed under this Agreement. At the City's election, City may deduct the amounts paid pursuant to this Section, from any balance owing to Consultant.

6. Successors, Assignment and Delegation. City and the Consultant each binds themselves, their partners, successors, assigns and legal representatives to the other hereto and to partners, successors, assigns and legal representatives of such other party in respect to all covenants, agreements and obligations contained in this Agreement.

The expertise and experience of Consultant are material considerations for this Agreement. Consultant shall not assign or transfer any interest in this Agreement or the performance of any of Consultant's obligations under this Agreement without the prior written consent of the City. Any attempted assignment or transfer of any of Consultant's rights, duties or obligations arising under this Agreement shall be null and void.

7. Nondiscriminatory Employment Practices. During the performance of this Agreement, the Consultant agrees not to discriminate against any employee or applicant for employment because of race, sex, creed, color, religion, age, sexual orientation, marital status, national origin, political affiliation, handicap or belief in accordance with requirements of City, State or Federal laws and regulations. Consultant will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, sex, creed, color, religion, age, sexual orientation, marital status, national origin, political affiliation, handicap or belief in accordance with requirements of City, State or Federal laws and regulations. Such actions shall include, but not be limited to the following: employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoffs or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. The Consultant agrees to post in conspicuous places, available to employees, applicants and subcontractors for employment, notices setting forth the provisions of this non-discrimination clause.

In the event of the Consultant's non-compliance with the non-discrimination clause of this Agreement, this Agreement may be immediately canceled, terminated or suspended in whole or in part.

8. Subcontracting. Consultant's services are unique and personal. Except as may be specified in Consultant's Proposal and agreed to by the City, Consultant will not subcontract any portion of the services without prior written approval of City Manager or his/her designee. If Consultant subcontracts any of the services, Consultant will be fully responsible to City for the acts, errors and omissions of Consultant's subcontractor and of the persons either directly or indirectly employed by the subcontractor, as Consultant is for the acts and omissions of persons directly employed by Consultant. Nothing contained in this Agreement will create any contractual relationship between any subcontractor of Consultant and City. Consultant will be responsible for payment of subcontractors. Consultant will bind every subcontractor and every subcontractor of a subcontractor by the terms of this Agreement applicable to Consultant's work unless specifically noted to the contrary in the subcontract and approved in writing by City.

9. Other Consultants. The City reserves the right to employ other consultants in connection with the services.

10. Indemnification. Consultant shall indemnify and save harmless the City, its officials, officers, employees, agents and volunteers (collectively hereinafter the "City"), against any and all damages to property or injuries to or death of any person or persons, including property and employees or agents of the City and shall indemnify and save the City from any and all liability and expense including reimbursement of reasonable defense costs and legal fees, and claims, demands, suits, actions or proceedings of any kind or nature, including Workers' Compensation claims, of or by anyone whomsoever to the extent resulting from or arising out of the negligent, reckless or willful misconduct for the Consultant, its officers, employees, subconsultants or agents in the performance of the duties undertaken by Consultant pursuant to this Agreement.

This indemnification and hold harmless obligation does not extend to claims arising out of the negligence or willful misconduct of the City.

11. Insurance. Without limiting the Consultant's indemnification of the City, Consultant shall obtain and maintain, at its cost and expense, for the duration of the Agreement and any and all amendments, insurance against claims for injuries to persons or damage to property which may arise out of or in connection with performance of the services by Consultant or Consultant's agents, representatives, employees or subcontractors. The insurance will be obtained from an insurance carrier admitted and authorized to do business in the State of California. Such evidence shall specifically identify this Agreement and shall contain express conditions that the City is to be given written notice at least thirty (30) days in advance of any termination or implementation of a reduction of limits or material change of insurance coverage as specified herein. Failure on the part of the Consultant to procure or maintain insurance shall constitute a material breach upon which the City may immediately terminate this Agreement. All insurance required hereunder shall be primary with respect to any insurance maintained by the City.

Coverages and Limits. Consultant will maintain the types of coverages and minimum limits indicated below, unless the Risk Manager or City Manager, in consultation with the City Attorney approves a lower amount. These minimum amounts of coverage will not constitute any limitations or cap on Consultant's indemnification obligations under this Agreement. City, its officers, agents, volunteers and employees make no representation that the limits of the insurance specified to be carried by Consultant pursuant to this Agreement are adequate to protect Consultant. The coverage will contain no special limitations on the scope of its

protection to the below-designated insureds except for Workers Compensation and errors and omissions insurance. Consultant will obtain occurrence coverage, excluding Professional Liability, which will be written as claims-made coverage. If Consultant believes that any required insurance coverage is inadequate, Consultant will obtain such additional insurance coverage, as Consultant deems adequate, at Consultant's sole expense.

11.1 Commercial General Liability Insurance. $1,000,000 combined single-limit per occurrence for bodily injury, personal injury and property damage. If the submitted policies contain aggregate limits, general aggregate limits will apply separately to the work under this Agreement or the general aggregate will be twice the required per occurrence limit.

11.2 Workers' Compensation and Employer's Liability. Workers' Compensation limits as required by the California Labor Code and Employer's Liability limits of $1,000,000 per accident for bodily injury. Workers' Compensation and Employer's Liability insurance will not be required if Consultant has no employees and provides, to City's satisfaction, a declaration stating this.

11.3 Professional Liability. Errors and omissions liability appropriate to Consultant's profession with limits of not less than $1,000,000 per claim. The coverage shall also provide an extended two (2) year reporting period commencing upon termination or cancellation of this Agreement.

Endorsements. For Commercial General Liability Insurance and Automobile Liability Insurance, Consultant will ensure that the policies are endorsed to name the City of Compton and its respective elected and appointed officers, officials, employees, agents and volunteers as **"additional insureds"** with respect to liability arising out of the activities of the Consultant. Any failure to comply with reporting provisions of the policies shall not affect coverage provided to the City. ***Prior to City's execution of this Agreement, Consultant will furnish certificates of insurance and endorsements to City.***

Waiver of Subrogation. The policies shall contain a waiver of subrogation for the benefit of City.

12. Permits and Licenses. Consultant, at its own expense, during the term of this Agreement, shall obtain and maintain all appropriate business and professional permits, licenses and certificates that may be required in connection with the performance of services by the Consultant. Upon execution of this Agreement, the Consultant shall show evidence of a business license permit in conformance with *Section 9-1.2* of the *Compton Municipal Code*.

13. Maintenance of Records. Consultant will maintain complete and accurate records with respect to costs incurred under this Agreement. All records will be clearly identifiable. Consultant will allow a representative of City during normal business hours to examine, audit, and make transcripts or copies of records and any other documents created pursuant to this Agreement. Consultant will allow inspection of all work, data, documents, proceedings, and activities related to the Agreement for a period of three (3) years, or longer if required by law, from the date of final payment under this Agreement.

14. Warranties. Consultant represents and warrants (i) that Consultant has no obligations, legal or otherwise, inconsistent with the terms of this Agreement or with Consultant's undertaking this relationship with City, (ii) that the performance of the services called for by this Agreement do not and will not violate any applicable law, rule or regulation or any proprietary or

other right of any third party, (iii) that Consultant will not use in the performance of his responsibilities under this Agreement any confidential information or trade secrets of any other person or entity and (iv) that Consultant has not knowingly entered into or will enter into any agreement (whether oral or written) in conflict with this Agreement.

15. General Compliance with Laws. Consultant will keep fully informed of federal, state and local laws and ordinances and regulations which in any manner affect those employed by Consultant, or in any way affect the performance of the services by Consultant. Consultant will at all times observe and comply with these laws, ordinances, and regulations and will be responsible for the compliance of the services with all applicable laws, ordinances and regulations.

16. Termination. In the event of the Consultant's failure to prosecute, deliver, or perform the services, after giving written notice of default and two (2) days to correct the same, then, in addition to any other remedies, City may terminate this Agreement for nonperformance by notifying Consultant in writing. Consultant has five (5) business days to deliver any documents owned by City and all work in progress to City address contained in this Agreement. City will make a determination of fact based upon the work product delivered to City and of the percentage of work that Consultant has performed which is usable and of worth to City in having the Agreement completed. Based upon that finding City will determine the final payment of the Agreement. In the event City elects to terminate, City will have the right to immediate possession of all Work Product and work in progress prepared by Consultant, whether located at the project site, at Consultant's place of business, or at the offices of a subconsultant.

The City's obligation is payable only from funds appropriated for the purpose of this Agreement. All funds for payments after the end of the current fiscal year are subject to the City's legislative appropriation for this purpose. In the event this Agreement extends into succeeding fiscal year periods and the City Council does not allocate sufficient funds for the next succeeding fiscal year payments, this Agreement shall terminate immediately upon written notice from the City.

Either Party, upon tendering fifteen (15) calendar days written notice to the other Party, may terminate this Agreement for convenience. In this event and upon request of City, Consultant will assemble the work product without charge and put it in order for proper filing and closing and deliver it to City. Consultant will be paid for work performed to the termination date; however, the total will not exceed the lump sum fee payable under this Agreement. City will make the final determination as to the portions of tasks completed and the compensation to be made.

17. Force Majeure. In the event that performance by either party is rendered impossible (permanently or temporarily) due to acts of war, acts of terrorism, fires, floods, epidemics, quarantine restrictions, or other natural occurrences, strikes, work slowdowns, lockouts (other than lockout by Consultant), or other similar acts to those described above or other causes beyond the reasonable control of such party, and without fault or negligence, said event shall excuse performance by such party, or in the case of temporary impossibility, shall excuse performance only for a period commensurate with the period of impossibility. Notwithstanding the foregoing, City shall have the right to terminate this Agreement upon any event that renders performance impossible. In such case, City shall be responsible for payment of compensation for the reasonable value of services rendered to the point at which this Agreement is terminated, but in no event to exceed the total lump sum fee payable under this Agreement.

18. Covenants Against Contingent Fees. Consultant warrants that Consultant has not employed or retained any company or person, other than a bona fide employee working for Consultant, to solicit or secure this Agreement, and that Consultant has not paid or agreed to pay any company or person, other than a bona fide employee, any fee, commission, percentage, brokerage fee, gift, or any other consideration contingent upon, or resulting from, the award or making of this Agreement. For breach or violation of this warranty, City will have the right to terminate this Agreement for nonperformance, or, in its discretion, to deduct from the Agreement price or consideration, or otherwise recover, the full amount of the fee, commission, percentage, brokerage fees, gift, or contingent fee.

19. Claims And Lawsuits. By signing this Agreement, Consultant agrees that any Agreement claim submitted to City must be asserted as part of the Agreement process as set forth in this Agreement and not in anticipation of litigation or in conjunction with litigation. Consultant acknowledges that if a false claim is submitted to City by Consultant, it may be considered fraud and Consultant may be subject to criminal prosecution. Consultant acknowledges that California Government Code sections 12650 *et seq.*, the False Claims Act, applies to this Agreement and, provides for civil penalties where a person knowingly submits a false claim to a public entity. These provisions include false claims made with deliberate ignorance of the false information or in reckless disregard of the truth or falsity of information. If City seeks to recover penalties pursuant to the False Claims Act, it is entitled to recover its litigation costs, including attorney's fees. Consultant acknowledges that the filing of a false claim may subject Consultant to an administrative debarment proceeding as the result of which Consultant may be prevented to act as a Consultant on any public work or improvement for a period of up to five (5) years. Consultant acknowledges debarment by another jurisdiction is grounds for City to terminate this Agreement.

20. Certifications. The Consultant, under penalty of perjury, certifies that, except as noted below, he/she or any other person associated therewith in the capacity of owner, partner, director, officer, manager:

- is not currently under suspension, debarment, voluntary exclusion, or determination of ineligibility by any Federal, State or local agency;
- has not been suspended, debarred, voluntarily excluded or determined ineligible by any Federal, State or local agency within the past 3 years;
- does not have a proposed debarment pending; and
- has not been indicted, convicted, or had a civil judgment rendered against he/she/it by a court of competent jurisdiction in any matter involving fraud or official misconduct in connection with obtaining, attempting to obtain, or performing a public (Federal, state or local) transaction or contract under a public transaction; violation of Federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property within the past 3 years; and
- are not presently indicted or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in the preceding paragraph; and
- have not had one or more public transactions (Federal, State or local) terminated for cause or default within the past 3 years.

If there are any exceptions to this certification, insert the exceptions in the following space.

[Supply exceptions on separate page]

For any exception noted above, indicate below to whom it applies, initiating agency, and dates of action.

[Attach separate page]

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction. The above certifications are part of this contract.

Signing this agreement on the signature portion thereof shall also constitute signature of the above Certifications.

Anthony Willoughby, Owner **(Date)**

21. Jurisdiction, Venue and Governing Law. Any action at law or in equity brought by either of the Parties for the purpose of enforcing a right or rights provided for by this Agreement will be tried in a court of competent jurisdiction in the County of Los Angeles, State of California, and the Parties waive all provisions of law providing for a change of venue in these proceedings to any other county. This agreement will be governed by the laws of the State of California.

22. Testimony. Consultant will testify at City's request if litigation is brought against City in connection with Consultant's services under this agreement. Unless the action is brought by Consultant, or is based upon Consultant's actual or alleged negligence or other wrongdoing, City, upon prior written agreement with Consultant will compensate Consultant for time spent in preparation for testimony, testimony, and travel at Consultant's standard hourly rates at the time of actual testimony.

23. Waivers. The waiver by either Party of any breach or violation of any term, covenant, or condition of this Agreement or of any applicable law will not be deemed to be a waiver of such term, covenant, condition or law or of any subsequent breach or violation of same or of any other term, covenant, condition or law. The acceptance by either Party of any fee or other payment which may become due under this Agreement will not be deemed to be a waiver of any preceding breach or violation by the other Party of any term, covenant, or condition of this Agreement or any applicable law.

24. Authority. The individuals executing this Agreement and the instruments referenced in it on behalf of Consultant each represent and warrant that they have the legal power, right and actual authority to bind Consultant to the terms and conditions of this Agreement.

25. Severability. If any term, provision, condition or covenant of this Agreement or its application to any party or circumstances shall be held, to any extent, invalid or unenforceable, the remainder of this Agreement, or the application of the term, provision, condition or covenant to persons or circumstances other than those as to whom or which it is held invalid or unenforceable, shall not be affected, and shall be valid and enforceable to the fullest extent permitted by law.

26. Amendments. This Agreement may be modified or amended only be written document executed by both Consultant and City's City Manager and approved as to form by the City Attorney. Such document shall expressly state that it is intended by the parties to amend the terms and conditions of this Agreement.

27. Confidentiality. All documents, reports, information, data, and exhibits prepared or assembled by Consultant in connection with the performance of the services pursuant to the Agreement are confidential until released by the City to the public, and the Consultant will not make any of these documents or information available to any individual or organization not employed by the Consultant or the City without the written consent of the City before any such release.

28. Entire Agreement. This Agreement, together with any other written document referred to or contemplated by it embody the entire Agreement and understanding between the parties relating to the subject matter of it. The City Manager is authorized, in consultation with the City Attorney, to agree to non-material amendments to this Agreement. Neither this Agreement nor any of its provisions may be amended, modified, waived or discharged except in a writing signed by both parties.

29. Notices. Any notices required or permitted under this Agreement shall be effective when delivered in person; and effective one (1) business day after delivery by facsimile transmission; and effective five (5) days after mailing by U.S. Mail, postage prepaid and properly addressed as follows:

TO CONSULTANT:

LAW OFFICES OF ANTHONY WILLOUGHBY
200 Corporate Pointe, Suite 495
Culver City, California 90230
Attn: Anthony Willoughby, Esq.

TO CITY:

CITY OF COMPTON
205 South Willowbrook Avenue
Compton, California 90220
Attn: City Manager
(310) 605-5585
(310) 631-0322 – fax.

In the event of any change of address, the moving party is obligated to notify the other party of the change of address in writing. Each party may amend, supplement and update the notice list to add, delete or replace any listed individuals; however, the amendment must be in writing.

30. Miscellaneous. No provision of this Agreement is to be interpreted for or against either party because that party or that party's legal representative drafted such provision.

Should either party hereto, or any representative, successor or assign of either party hereto, resort to litigation to enforce the provisions of this Agreement, the party or parties prevailing in such litigation shall be entitled, in addition to such other relief as may be granted, to

recover its or their reasonable attorney's fees and costs in such litigation from the party or parties against whom enforcement is sought.

IN WITNESS WHEREOF, CONSULTANT has executed this Agreement, and the **CITY**, by its City Manager, who is authorized to do so, has executed this Agreement.

LAW OFFICES OF ANTHONY WILLOUGHBY, ESQ.
CONSULTANT

Dated: _____ **By** _____
Anthony Willoughby, Esq.
Owner

CITY OF COMPTON
Approved by:

Dated: _____ **By** _____
Johnny Ford, City Manager

Approved as to form:

By _____ **Dated:** _____
Craig J. Cornwell, City Attorney

ATTEST:

Dated: _____ **By** _____
Alita Godwin, City Clerk

February 17, 2015

TO: **MAYOR AND CITY COUNCIL MEMBERS**

FROM: **ROBERT DELGADILLO, PLANNING MANAGER**
PLANNING AND ECONOMIC DEVELOPMENT

SUBJECT: **AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF COMPTON AMENDING CHAPTER 30 (ZONING CODE) OF THE COMPTON MUNICIPAL CODE BY DELETING SECTION 30-21.11.C AND ADDING SECTION 30-21.12 TO ESTABLISH REGULATIONS FOR A MODIFIED PARKING REQUIREMENT**

SUMMARY

The City Council will consider an ordinance adopting regulations which will create flexibility in the parking code to allow for the creation of a Modified Parking Requirement ("MPR") for any land use that can demonstrate the provision of adequate parking less than the amount specified in the zoning ordinance or through other means such as shared parking and valet parking.

BACKGROUND

The parking section of Chapter 30 of the Compton Municipal Code ("CMC") contains fixed parking ratios based on the amount of building square feet, the number of seats, auto bays or other criteria that determine the required minimum amount of parking a given land use/business must provide to be in compliance with the CMC. This method of ensuring adequate parking works for the majority of uses, however there are times when specific land uses/businesses that may not require the amount of parking specified in the CMC due to unusual circumstances or special/unique characteristics of the land use. If that is the case, a Planning Commission-approved variance is the only process authorized to seek relief from strict compliance with the CMC requirements.

The proposed code amendment would allow additional flexibility by providing business/property owners and/or developers an additional tool to more accurately tailor the amount of parking provided to the actual operational characteristics of the land use. This results in the avoidance of building unnecessary parking spaces and allows smaller sites to become economically viable development opportunities.

STATEMENT OF ISSUE

The proposed code text amendment provides a simpler and more objective means to modify the minimum parking required without having to file a separate variance application and going through a separate entitlement process. This "MPR" allows for a wider range of development opportunities in Compton by opening up the potential for an alternative parking requirement. The "MPR" will not be applied without careful analysis.

Before an MPR can be approved the business owner or developer must have a registered transportation or civil engineer prepare a parking study or similar study that supports the parking provided which is different than amount required from the CMC. The study will use surveys of similar uses and established transportation methodology to provide justification that the amount of parking proposed will be adequate for the proposed land use. If after reviewing the parking study staff agrees with the findings of the parking study, the MPR will be approved by either the Planning Commission or the Architectural Review Board, depending on which body has authority under the CMC to approve the associated project.

Environmental Concerns

In accordance with the California Environmental Quality Act ("CEQA" - Public Resources Code, Division 13 §21000 et seq.) an Initial Study (IS) for the project was prepared by EcoTerra for the City of Compton which identifies and evaluates the environmental impacts of the project. The City of Compton, in its capacity as Lead Agency, has determined that the proposed project requires a Mitigated Negative Declaration ("MND") and mitigation monitoring plan, as part of its environmental review. A Mitigated Negative Declaration is a determination that the proposed project will have less than significant environmental impacts on the environment with the implementation of the mitigation measures. All mitigation measures proposed in the IS/MND have been incorporated as conditions of approval under "Mitigation Based Conditions".

The IS/MND environmental document was posted in the LA County Clerk office in Norwalk, posted on the City of Compton Planning & Economic Development Department's webpage and circulated to service providers and public agencies for a 30 day public review period from December 22, 2014 to January 21, 2015 and comments were received from the SCAQMD, LA County Fire Department, CALTRANS, LA County Sanitation and a Compton resident. The Draft Mitigated Negative Declaration includes the required response to comments resulting from the required public review period and is contained with the MND as Section 21.

A public hearing was held by the Planning Commission on February 11, 2015, and the Planning Commission approved for Negative Declaration No. 933 as adequate for Zoning Text Amendment 2014-003, in addition to recommending that the City Council approve Zoning Text Amendment 2014-003, subject to revised Finding No. 1, as follows:

> "The Planning Commission recommends that the City Council find that the proposed use conforms to the standards of the Zoning Ordinance upon the adoption of a zone text amendment entitled: "An Ordinance of the City Council

of the City of Compton Amending Chapter 30 (Zoning Code) of the CMC By Deleting Section 30-21.11.C and adding Section 30-21.12.1 to Establish Regulations For A Modified Parking Requirement."

FISCAL IMPACT

There is no anticipated fiscal impact to the General Fund from this ordinance. The ordinance amends an existing section of the CMC.

RECOMMENDATION

Adopt the attached Ordinance for Zoning Text Amendment 2014-03, deleting Section 30-21.11(c) and adding Section 30-21.12 to the Compton Municipal Code.

ROBERT DELGADILLO
PLANNING MANAGER

STEVEN MASURA
DIRECTOR OF COMMUNITY DEVELOPMENT

APPROVED FOR FORWARDING:

JOHNNY FORD
CITY MANAGER

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF COMPTON AMENDING CHAPTER 30 (ZONING CODE) OF THE COMPTON MUNICIPAL CODE BY DELETING SECTION 30-21.11.C AND ADDING SECTION 30-21.12 TO ESTABLISH REGULATIONS FOR A MODIFIED PARKING REQUIREMENT

WHEREAS, the City of Compton is authorized by Article XI, Section 7 of the California Constitution to make and enforce within its limits all local, police, sanitary and other ordinances and regulation not in conflict with general laws; and

WHEREAS, the City has adopted a set of laws regulating the provision of off-street parking spaces within Section 30-21 of the Compton Municipal Code; and

WHEREAS, the City finds it efficient to delete Section 30-21.11(c) of the Compton Municipal Code and to replace it with a new revised code section to provide enhanced flexibility through the provision of a Modified Parking Requirement for off-street parking spaces, so as to increase the potential for the redevelopment of existing lots within the City; and

WHEREAS, in accordance with the California Environmental Quality Act ("CEQA" - Public Resources Code, Division 13 §21000 et seq.), an Initial Study ("IS") for the project was prepared by EcoTerra for the City of Compton which identifies and evaluates the environmental impacts of the project. The City of Compton, in its capacity as Lead Agency, has determined that the proposed project requires a Mitigated Negative Declaration ("MND") and mitigation monitoring plan, as part of its environmental review. All mitigation measures proposed in the IS/MND have been incorporated as conditions of approval under "Mitigation Based Conditions;" and

WHEREAS, the IS/MND environmental document was posted in the LA County Clerk office in Norwalk, posted on the City of Compton Planning & Economic Development Department's webpage and circulated to service providers and public agencies for a 30 day public review period from December 22, 2014 to January 21, 2015 and thee Draft Mitigated Negative Declaration includes the required response to comments resulting from the required public review period and is contained with the MND as Section 21; and

WHEREAS, a public hearing for Negative Declaration No. 933 was held by the Planning Commission on February 11, 2015, and the Planning Commission approved Mitigated Negative Declaration No. 933 as adequate for Zoning Text Amendment 2014-003; and

WHEREAS, a public hearing for Zoning Text Amendment 2014-003 was held before the Planning Commission on February 11, 2015, and the Planning Commission recommended that the City Council approve Zoning Text Amendment 2014-003, subject to revised Finding No. 1, as follows:

> "The Planning Commission recommends that the City Council find that the proposed use conforms to the standards of the Zoning Ordinance upon the adoption of a zone text amendment entitled: " An Ordinance of the City Council of the City of Compton Amending Chapter 30 (Zoning Code) of the CMC By Deleting Section 30-21.11.C and adding Section 30-21.12 to Establish Regulations For A Modified Parking Requirement."

WHEREAS, the City Council of the City of Compton has determined that the public health, safety and welfare of the residents of the City will be promoted through the amendment of Section 30-21 regulating the provision of off street parking spaces.

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

Section 1. That Section 30-21.11(c) – (Special Exceptions) – of Chapter 30 of the Compton Municipal Code is hereby deleted in its entirety.

Section 2. That Chapter 30 of the Compton Municipal Code is hereby amended to add Section 30-21-12 (Modified Parking Requirement) and shall read as follows:

30-21.12 Modified Parking Requirement (MPR).

30-21.12(a) Purpose. The purpose of this section is to create a Modified Parking Requirement (MPR) to regulate parking for certain types of uses and uses of a certain size whose requirements are difficult to anticipate and cannot be adequately provided for in Section 30-21 (Off-Street Parking and Loading). Except as otherwise indicated, joint parking arrangements, temporary parking lots, special parking plans, shared parking plans, valet parking and reduced parking requirements established in accordance with this section shall supersede all other requirements of Sections 30-21 and referred to as a "MPR."

30-21.12(b) Definitions. For purposes of this Section, the following words and phrases are defined and shall be construed as follows:

Planning Commission shall mean the Planning Commission of the City of Compton.

Architectural Review Board shall mean an Architectural Review Board shall be established to review those projects designated by this Chapter as subject to design review. The Architectural Review Board shall be administered by the Planning Department.

Modified Parking Requirement (MPR) shall mean joint parking arrangements, shared parking plans, valet parking, temporary parking lots and reduced minimum parking required. All MPR's shall require the submittal to the City of a parking demand or other study based on surveys of similar land uses and/or the Institute of Traffic Engineers (ITE) data or other professional sources.

30-21.12(c) Establishment of Modified Parking Requirement. The procedure for application to establish a Modified Parking Requirement (MPR) shall be in accordance with the provisions of Section 30-26.5 (Conditional Use Permit) of this Code if the project requires Planning Commission approval. If the project is an administrative approval, the Architectural Review Board shall have approval authority of the MPR.

30-21.12(d) Findings Required. The Planning Commission and/or Architectural Review Board, prior to approving a request to establish, modify, or repeal a MPR shall find:

1. That the MPR provides adequate parking to meet parking demand for the project or uses subject to the MPR.

2. That the parking demand or other study is based on surveys of similar land uses and/or the Institute of Traffic Engineers (ITE) data or other professional sources.

3. That the parking demand or other study has been adequately prepared.

30-21.12(e) Conditions of Approval. The Planning Commission, as part of the resolution or the Architectural Review Board as part of an approval letter approving the MPR request, may impose such conditions and limitations that it deems necessary to protect the public welfare and assure compliance with the intent and purpose of this Chapter and the plans and policies of the City.

30-21.12(f) Modified Parking Requirement Standards.

1. **Decreased Parking Requirements.** The MPR shall identify each use that is granted modified parking requirements, along with each use's new minimum parking requirement.

2. **Location of Required Parking Spaces.** The parking spaces required by the MPR may be provided on-site or on an abutting contiguous lot, or on a lot across a public right of way that is within 300 feet of the land use regardless of underlying ownership, or within a reasonable walking distance as determined by the approving authority, or on-street for residential land uses. Where parking is provided across multiple lots, a covenant shall be recorded in the Office of the County Recorder by the owner or owners of such lots or parcels of land, for a period of not less than 20 years. The required parking as specified by the MPR shall be maintained as long as the use or building exists unless it can be demonstrated that Code required parking can be provided onsite.

3. **Bicycle Parking and Other Transportation Demand Management Measures.** If an MPR is established, bicycle parking shall be required at the rate provided in Section 30-21.3(g); however, bicycle parking and other improvements or measures to encourage alternative transportation modes and vehicle trip reduction may be required based on the modified parking as determined in the parking demand or other study.

30-21.12(g) Other Provisions.

1. Use of the MPR shall prohibit the use of any compact parking spaces onsite.

2. Use of the MPR may require the provision of a landscape planter/tree well at the head of every fifth parking space. Wheel stops will be not permitted.

3. The Director of Community Development may apply any additional conditions of approval as deemed necessary.

Section 3. That the City Council declares that, should any provision, section, subsection, sentence, paragraph, clause, phrase or word of this Ordinance, hereby adopted, be rendered or declared invalid by any final court action in a court of competent jurisdiction, or by an reason of any preemptive legislation, the remaining provisions, sections, subsections, sentences, paragraphs, clauses, phrases or words of this ordinance hereby adopted shall remain in full force and effect.

Section 4. That a copy of this Ordinance shall be filed in the offices of the City Clerk, City Manager, City Attorney, Planning and Economic Development Department, Building and Safety Department, Public Works/Municipal Utilities and the Los Angeles County Sheriff's Department, Compton Station.

Section 5. That this Ordinance and the rules, regulations, provisions, requirements, orders and matters established and adopted hereby shall take effect and be in full force and effect thirty (30) days after the date of its final passage and adoption by the City Council.

Section 6. That the Mayor shall sign and the City Clerk shall attest to the adoption of this Ordinance and shall cause the same to be published as required by law.

ADOPTED this _____ day of _____, 2015.

_____
MAYOR OF THE CITY OF COMPTON

ATTEST:

_____
CITY CLERK OF THE CITY OF COMPTON

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF COMPTON: ss

I, Alita Godwin, City Clerk of the City of Compton, do hereby certify that the foregoing Ordinance was adopted by the City Council of the City of Compton, signed by the Mayor and attested by the City Clerk at a regular meeting thereof held on the _____ day of _____, 2015.

That said Ordinance was adopted by the following vote, to wit:

AYES: COUNCILMEMBERS-
NOES: COUNCILMEMBERS-
ABSENT: COUNCILMEMBERS-
ABSTAIN: COUNCILMEMBERS-

_____
CITY CLERK OF THE CITY OF COMPTON

Brickyard Commerce Center Final Initial Study/Mitigated Negative Declaration

PREPARED FOR:
The City of Compton
Planning and Economic Development Department
Planning Division
205 South Willowbrook Avenue
Compton, California 90220

PREPARED BY:
EcoTierra Consulting
555 W 5th Street, 31st Floor
Los Angeles, CA 90013
(213) 235-4770

February 2015

EcoTierra consulting

#10.

Planning & Economic Development Department - Planning Division
205 S. Willowbrook Ave., Compton, CA 90220 (310) 605-5532 Fax: (310) 761-1488 www.comptoncity.org

NOTICE OF PLANNING COMMISSION PUBLIC HEARING
CONDITIONAL USE PERMIT CASE NO. 2752
VESTING TENTATIVE PARCEL MAP NO. 72667
DEVELOPMENT AGREEEMENT
ZONING TEXT AMENDMENT 2014-003
MITIGATED NEGATIVE DECLARATION NO. 933

This is to notify you that applications for development of the Brickyard site, located at 13633, 13801, and 13805 South Central Avenue, Compton, CA, in the M-H (Heavy Manufacturing) zone, have been filed with the Planning & Economic Development Department. The Project is a Conditional Use Permit request to develop either:

1) Two light industrial buildings with truck loading doors totaling 1.5 million-square feet with the largest building located on the northern portion of the property and a smaller 70,000-square foot building located on the southern portion of the property; or

2) Three light industrial buildings with truck loading doors totaling 1,077,000 square feet. The two larger buildings would be 525,400 and 481,600 square feet and would be located on the northern portion of the property. The smaller 70,000-square foot building would be located on the southern portion of the property.

Planned industrial developments, buildings over 50,000 square feet in size and new industrial buildings located within 200 feet of residential areas require approval of a conditional use permit in accordance with Section 30-26 of the Compton Municipal Code.

The second request is for a vesting tentative parcel map to consolidate 12 existing industrial lots into three. The tentative vesting parcel map has been prepared in accordance with Section 28 of the Compton Municipal Code. The third request is for a Development Agreement to grant certain restrictions on the City and development. The fourth request is for a Zoning Text Amendment to create a modified parking requirement.

Mitigated Negative Declaration (MND) No. 933 has been prepared in accordance with the California Environmental Quality Act (CEQA).

This project may or may not directly affect your property but the proposed activity may have an effect on your neighborhood. If you are interested in this matter the Planning Commission will hold a public hearing on **Wednesday, February 11, 2015, 7:00 p.m., in the Council Chamber at Compton City Hall, 205 S Willowbrook Avenue.**

STEVEN MASURA
DIRECTOR, COMMUNITY
DEVELOPMENT DEPARTMENT

Planning & Economic Development Department - Planning Division
205 S. Willowbrook Ave., Compton, CA 90220 (310) 605-5532 Fax: (310) 761-1488 www.comptoncity.org

AVISO DE AUDIENCIA PÚBLICA COMISIÓN DE PLANIFICACIÓN
PERMISO DE USO CONDITIONAL CASO NO. 2752
MAPA DE PARCELA TENTATIVO NO. 72667
ACUERDO DE DESARROLLO
ENMIENDA DEL TEXTO DE ZONIFICACIÓN 2014-003
DECLARACIÓN NEGATIVA MITIGADA NO. 933

Esto es para notificarle que aplicaciones para el desarrollo del sitio Brickyard, ubicado en 13633, 13801 y 13805 South Central Avenue, Compton, CA, en la zona M-H (Manufactura Pesada), se han archivado en el Departamento de Planificación y Desarrollo Económico. El proyecto es una solicitud de un permiso de uso condicional para desarrollar uno de los siguientes:

1) Dos edificios industriales con puertas para camiones de carga de aproximadamente 1.5 millones de pies cuadrados. El edificio más grande estará ubicado en la parte norte de la propiedad y el edificio más pequeño de 70,000 pies cuadrados que estaría ubicado en la parte sur de la propiedad del edificio; o

2) Tres edificios industriales con puertas para camiones de carga de aproximadamente 1,077,000 de pies cuadrados. Los dos edificios más grandes que contienen 525,400 y 481,600 pies cuadrados estarán ubicados en la parte norte de la propiedad. El edificio más pequeño de 70,000 pies cuadrados estará ubicado en la parte sur de la propiedad.

Desarrollos industriales planeados, edificios de más de 50,000 pies cuadrados en tamaño y nuevos edificios industriales ubicados dentro 200 pies de área residenciales requieren la aprobación de un permiso de uso condicional conforme a la Sección 30-26 del Código Municipal de Compton.

La segunda solicitud es para un mapa de parcela tentativo para consolidar los 12 lotes industriales existentes en tres. El mapa de parcela tentativo ha sido preparado según la Sección 28 del Código Municipal de Compton. La tercera solicitud es para un acuerdo de desarrollo para otorgar ciertas restricciones sobre la Ciudad y el desarrollo. La cuarta solicitud es para una enmienda del texto de zonificación para modificar los requisitos de estacionamiento.

Declaración Negativa Mitigada (MND) No. 933 se ha preparado en conforme con la Ley de Calidad Ambiental de California (CEQA).

Este proyecto puede o no puede afectar directamente su propiedad pero la propuesta actividad puede tener un efecto en su vecindario. Si tiene interés en este asunto, la Comisión de Planificación tendrá una audiencia pública el **Miércoles, Febrero 11, 2015** a las **7:00 de la tarde, en la Cámara del Concilio, Edificio Municipal, 205 S Willowbrook Avenue.**

STEVEN MASURA
DIRECTOR, DEPARTAMENTO
DE DESARROLLO COMUNITARIO

TABLE OF CONTENTS

I. BACKGROUND 2
II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 29
III. DETERMINATION 29
IV. EVALUATION OF ENVIRONMENTAL IMPACTS 30
V. ANSWERS TO INITIAL STUDY QUESTIONS 39
1. Aesthetics 39
2. Agriculture 47
3. Air Quality 49
4. Biological Resources 69
5. Cultural Resources 72
6. Geology and Soils 76
7. Greenhouse Gas Emissions 82
8. Hazards and Hazardous Materials 90
9. Hydrology and Water Quality 98
10. Land Use and Planning 109
11. Mineral Resources 111
12. Noise 112
13. Population and Housing 135
14. Public Services 137
15. Recreation 143
16. Transportation/Traffic 144
17. Utilities and Service Systems 261
18. Mandatory Findings of Significance 270
19. Lead Agency 272
20. References 274
VI. COMMENTS AND RESPONSES 276
VII. MITIGATION MONITORING AND REPORTING PROGRAM 308

APPENDICES

APPENDIX A:	Air Quality Calculation Data
APPENDIX A-2:	Air Quality Calculation Data – Revised Site Plan A and B
APPENDIX B:	HRA for Commerce Diesel Trucks
APPENDIX B-2:	HRA for Commerce Diesel Trucks – Revised Site Plan A and B
APPENDIX C:	Historic Resource Report
APPENDIX D:	Geotechnical Report
APPENDIX E:	Greenhouse Gas Calculations
APPENDIX E-2:	Greenhouse Gas Calculations – Revised Site Plan A and B
APPENDIX F:	Phase I ESA
APPENDIX G:	Phase II Subsurface Investigation
APPENDIX H:	RAP
APPENDIX I:	SUSMP
APPENDIX J:	Noise Calculations
APPENDIX J-2:	Noise Calculations – Revised Site Plan A and B
APPENDIX K:	Traffic Study
APPENDIX K-2:	Traffic Study – Revised Site Plan A and B
APPENDIX L:	Water Supply Assessment

LIST OF FIGURES

Figure 1, Regional and Vicinity Project Location Map 3
Figure 2, Project Site Photos – Views 1, 2, and 3 6
Figure 3, Project Site Photos – Views 4, 5, and 6 7
Figure 4, Project Site Photos – Views 7, 8, and 9 8
Figure 5, Project Site Plan A 9
Figure 5(a), Revised Project Site Plan A 18
Figure 6, Site Plan A – Building 1 Elevation 10
Figure 7, Site Plan A – Flag Lot Elevation 11
Figure 8, Project Site Plan B 13
Figure 8(a), Revised Project Site Plan B 20
Figure 9, Site Plan B – Building 1 Elevation 14
Figure 10, Site Plan B – Building 2 Elevation 15
Figure 11, Site Plan B – Flag Lot Elevation 16
Figure 12, Site Plan A and B - Renderings 22
Figure 13, Surrounding Uses Site Photos – Views 1, 2, and 3 25
Figure 14, Surrounding Uses Site Photos – Views 4, 5, and 6 26
Figure 15, Surrounding Uses Site Photos – Views 7, 8, and 9 27
Figure 16, Noise Sensative Receptor Location Map 116
Figure 17, Study Intersection And Street Segment Locations 147
Figure 18, Project General Geographic Distributions (Passenger Vehicles) 153
Figure 19, Project General Geographic Distributions (Trucks) 154
Figure 20, Plan A Project Traffic Assignment Percentages (Passenger Vehicles) 156
Figure 21, Plan A Project Traffic Assignment Percentages (Building “A-1” – Trucks) 157
Figure 22, Plan A Project Traffic Assignment Percentages Building “A-2” – Trucks) 158
Figure 23, Net Site-Related Plan A Traffic Volumes – AM Peak Hour 159
Figure 24, Net Site-Related Plan A Traffic Volumes – PM Peak Hour 160
Figure 25, Conceptual Improvement Central Avenue 189
Figure 26, Plan B Project Traffic Assignment Percentages (Passenger Vehicles) 195
Figure 27, Plan B Project Traffic Assignment Percentages (Building “B-1” – Trucks) 196
Figure 28, Plan B Project Traffic Assignment Percentages (Building “B-2” – Trucks) 197
Figure 29, Plan B Project Traffic Assignment Percentages (Building “B-3” – Trucks) 198
Figure 30, Net Site-Related Plan B Traffic Volumes – AM Peak Hour 200

Figure 31, Net Site-Related Plan B Traffic Volumes – PM Peak Hour 201
Figure 32, Future (2017) Ambient Growth Plus Plan B Project Traffic Volumes – AM Peak 204
Figure 33, Future (2017) Ambient Growth Plus Plan B Project Traffic Volumes – PM Peak 205

LIST OF TABLES

Table 1, SCAQMD Thresholds of Significance 51
Table 2, Estimated Peak Daily Construction Emissions From Non-Project Related Demolition Activity ... 52
Table 3, Estimated Peak Daily Construction Emissions 55
Table 3a, Estimated Peak Daily Construction Emissions – Revised Site Plan A Project 59
Table 4, Project Site (2014) Daily Operational Emissions 56
Table 5, Site Plan A Daily Operational Emissions 57
Table 5(a), Revised Site Plan A Daily Operational Emissions 60
Table 6, Site Plan B Daily Operational Emissions 58
Table 7, Localized On-Site Peak Daily Construction Emissions 64
Table 7(a), Localized On-Site Peak Daily Construction Emissions – Revised Site Plan A 67
Table 8, Localized On-Site Peak Daily Operational Emissions 64
Table 8(a), Localized On-Site Peak Daily Operational Emissions – Revised Site Plan A 67
Table 9, Project Health Risk Summary 66
Table 9(a), Project Health Risk Summary – Revised Site Plan A 68
Table 10, Proposed Project Construction-Related Greenhouse Gas Emissions 85
Table 10(a), Proposed Project Construction-Related Greenhouse Gas Emissions – Revised Site Plan A 88
Table 11, Project Site (2014) GHG Emissions 85
Table 12, Site Plan A GHG Emissions 86
Table 12(a), Revised Site Plan A GHG Emissions 88
Table 13, Site Plan B GHG Emissions 87
Table 14, Distances to Nearest Sensitive Receptors 115
Table 15, Existing Ambient Noise Levels in Project Site Vicinity 117
Table 16, Existing (2014) Roadway Noise Levels 118
Table 17, Noise Range of Typical Construction Equipment 119
Table 18, Typical Outdoor Construction Noise Levels 119
Table 19, Off-Site Roadway Noise Levels - Site Plan A 124
Table 19(a), Off-Site Roadway Noise Levels – Revised Site Plan A 128
Table 20, Off-Site Roadway Noise Levels - Site Plan B 125
Table 20(a), Off-Site Roadway Noise Levels - Site Plan B 129
Table 21, Vibration Source Levels for Construction Equipment 131
Table 22, Estimated Proposed Project Student Generation 140

Table 22(a), Estimated Revised Site Plan A Project Student Generation 141
Table 23, Project Trip Generation Rates 148
Table 24, Net Site-Related Trip Generation Estimates 151
Table 24(a), Net Revised Site Plan A-Related Trip Generation Estimates 226
Table 25, Geographic Project Trip Distribution Percentages 152
Table 26, CMA Volume Ranges per Level of Service Maximum Sum of Critical Volumes vs. Number of Signal Phases 161
Table 27, Level of Service as a Function of CMA Value 162
Table 28, Critical Movement Analysis Summary Existing (2014) Without and With Plan A Project Conditions 164
Table 28(a), Critical Movement Analysis Summary Existing (2014) Without and With Revised Site Plan A Project Conditions 227
Table 29, Criteria for Significant Traffic Impact 165
Table 30, Related Projects Descriptions and Trip Generation Estimates 167
Table 31, Critical Movement Analysis Summary Future (2017) Without and With Plan A Project Conditions City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections 168
Table 31(a), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan A Project Conditions City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections 229
Table 32, Critical Movement Analysis Summary Future (2017) Without and With Plan A Project Conditions City of Los Angeles Intersections 169
Table 32(a), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan A Project Conditions City of Los Angeles Intersections 231
Table 33, Critical Movement Analysis Summary Future (2017) Without and With Plan A Project Conditions City of Carson Intersections 174
Table 33(a), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan A Project Conditions City of Carson Intersections 233
Table 34, Traffic Signal Warrant Analysis Summary (CAMUTCD Guidelines for Traffic Signals) 176
Table 35, Street Traffic Impact Analysis Summary - Proposed Plan A Project Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service 178
Table 35(a), Street Traffic Impact Analysis Summary – Revised Site Plan A Project Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service 234
Table 36, Parking Requirements for Various Southern California Jurisdictions Industrial/Warehouse/Distribution Facilities 180
Table 37, Plan B Project Trip Generation Estimates 194
Table 38, Critical Movement Analysis Summary Existing (2014) Without and With Plan B Project Conditions 202
Table 38(b), Critical Movement Analysis Summary Existing (2014) Without and With Revised Site Plan B Project Conditions 237

Table 39, Critical Movement Analysis Summary Future (2017) Without and With Plan B Project Conditions City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections 207

Table 39(b), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan B Project Conditions City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections 239

Table 40, Critical Movement Analysis Summary Future (2017) Without and With Plan B Project Conditions City of Los Angeles Intersections 209

Table 40(b), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan B Project Conditions City of Los Angeles Intersections 241

Table 41, Critical Movement Analysis Summary Future (2017) Without and With Plan B Project Conditions City of Carson Intersections 211

Table 41(b), Critical Movement Analysis Summary Future (2017) Without and With Revised Site Plan B Project Conditions City of Carson Intersections 242

Table 42, Street Traffic Impact Analysis Summary - Proposed Plan B Project Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service 213

Table 42(b), Street Traffic Impact Analysis Summary – Revised Site Plan B Project Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service 242

Table 43, Critical Movement Analysis Summary Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions (City of Compton, County of Los Angeles Intersections Only) 225

Table 43(a), Critical Movement Analysis Summary Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions (City of Compton, County of Los Angeles Intersections Only) 248

Table 44, Project Estimated Solid Waste Generation 268

Table 44(a), Revised Site Plan A Project Estimated Solid Waste Generation 269

PREFACE TO THE FINAL INITIAL STUDY FOR THE BRICKYARD COMMERCE CENTER PROJECT

This Final Initial Study for the Brickyard Commerce Center Project (Project) was prepared in February, 2015 to reflect changes to the Draft Initial Study, and responses to comments received during the public and agency review of the Draft Initial Study and Proposed Mitigated Negative Declaration prepared for the Project. The Draft Initial Study, dated December, 2014, was circulated for public and agency review from December 22, 2014 to January 21, 2015. Responses to Comments are provided in Section VI of this Final Initial Study. Changes to the Draft Initial Study that are reflected in the Final Initial Study include revisions resulting from responses to comments and text changes to provide clarifications to the project description and analysis, and to correct non-substantive errors. Text deleted from the Draft Initial Study is shown in ~~strikethrough~~, and new text is <u>underlined</u>.

City of Compton

PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT
PLANNING DIVISION

205 S Willowbrook Ave
Compton, CA 90220
(310) 605-5500
FAX (310) 761-1488
www.comptoncity.org

ENVIRONMENTAL CHECKLIST FORM

MND No. 933

I. BACKGROUND

1. **Project Title:** Brickyard Commerce Center (CUP 2752, VTPM 72667)

2. **Lead Agency Name and Address:** City of Compton Planning and Economic Development Department-Planning Division, 205 S Willowbrook Avenue, Compton, CA 90220

3. **Contact Person and Phone Number:** Robert Delgadillo, Planning Manager, 310-605-5500

4. **Project Location:** The Project site is located in northwest Compton, northwest of the intersection of Rosecrans Avenue and Central Avenue. The Project site is currently comprised of 12 parcels containing a total of 2,541,111 gross square feet (58.34 gross acres) located at 13633, 13801, and 13805 Central Avenue. After roadway dedications, the Project site would be 2,457,325 net square feet (56.41 net acres). This area of Compton is characterized by relatively dense urban development including a varied mix of commercial, industrial, and residential land uses. As shown in Figure 1, the Project site is bounded by Sam Littleton Street and single-family residences to the north; Central Avenue and single-family residences to the east; a bus maintenance facility, a senior housing facility, and retail shopping center to the southeast; a large warehouse facility, two retail centers, one of which is largely unoccupied, a solid waste transfer station and recycling facility, a remnant and isolated residential use, a home improvement yard, and a recycling center to the southwest; Rosecrans Avenue and single family residences to the south; and McKinley Avenue and single-family residences to the west. Regional access to the Project site and vicinity is provided from the Century Freeway (I-105), located north of the Project site, and the Harbor Freeway (I-110), located west of the Project site. Major arterials providing access to the Project site include Rosecrans Avenue at the southern boundary of the Project site, and Central Avenue, adjacent to the eastern boundary of the Project site.

5. **Project Sponsor's Name and Address:** LA Brickyard LLC, 2221 Rosecrans Avenue, Suite 200, El Segundo, CA 90245

6. **General Plan Designation:** Mixed Use

7. **Zoning:** Heavy Manufacturing (MH)



Project Site

Source: Mac Maps, May 2014.

EcoTierra consulting

Figure 1
Regional and Project Vicinity Map

Revised Project

In response to comments on the Draft IS/MND submitted by agencies and the public, the Project (originally consisting of Site Plans A and B) has been revised (now identified as Revised Site Plan A and Revised Site Plan B). The Revised Site Plans result in an overall reduction in development potential as compared to the original Site Plan A Project, and accordingly reduce the number of environmental impacts from the maximum impacts identified in the Draft IS/MND.

Both Revised Site Plans contain 1.154 million square feet of light industrial/warehouse building(s) with truck loading doors, container parking, and automobile parking facilities. The additional site plan options also reflect the removal of the previously proposed 70,000 square foot light industrial building on the southern flag lot (Building A-2/B-3) from the Project. Revised Site Plan A results in reduction of 276,000 total square feet as compared to the original Site Plan A. Revised Site Plan B results in a slight increase of 77,000 square feet of total project floor area. Overall, the Revised Project Site Plans result in net reduction of 199,000 square feet of total floor area as compared to the original projects (Site Plans A and B combined). Detailed descriptions of Revised Site Plan A and Revised Site Plan B are provided below.

CEQA Guidelines Section 15073.5 requires recirculation of a Mitigated Negative Declaration when the document has been substantially revised after public circulation, but prior to its adoption. "Substantial revisions" occur when: (1) a new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required. Guideline Section 15073.5(c)(2) indicates the recirculation is not required when new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration, which are not new avoidable significant effects.

The project revisions reflected in Revised Site Plan A and B do not trigger any new significant impacts not previously disclosed as part of the original Project (for both Site Plan A and B). Additionally, no new (previously undisclosed) mitigation measures are required for the Revised Site Plans to reduce impacts below the thresholds of significance. The changes are in response to written and verbal comments on the project's effects and result in an overall reduction in development potential and reduced environmental impacts. Accordingly, the Revised Site Plan A and B discussed below do not require recirculation of the MND to the public for an additional 30 day period.

8. Description of Project: (*Describe the whole action involved, including without limitation later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary*)

The Project site has been associated with the Atkinson Brick Company (Atkinson Brick) since 1939. That year, Atkinson Brick purchased the northeastern portion of the property. The company then purchased the northwestern portion of the property, where clay was mined and used in brick manufacturing, and an open mining pit resulted, which is still present within the Project site. In the mid-1950s, the company purchased the fields south of the clay pit. Given the size, location, and layout of the Project site, and its capability to accommodate a wide variety of industrial and commercial activities, many different uses have been located within the Project site over time. In addition to brick manufacturing (which was phased out in approximately 2002), recent uses including a concrete batch plant, pipe storage yard, truck and crane operations training school, truck maintenance facility, and overnight parking for trucks and trailers have been located on the Project site in recent years. Ancillary concrete, brick, and asphalt crushing operations, and associated storage piles, have also recently been located within the brickyard, and buildings previously associated with brick manufacturing have been used for storage. Varying combinations of these activities have occurred at different times over the recent history of

the site. Beginning in 1992, a reverse mining operation was initiated, under which the former clay mining pit is to ultimately be filled with clean soil in a controlled fashion under the oversight of the Regional Water Quality Control Board and the State Mining and Geology Board.

When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.). Designated dirt roadways were being used by trucks operating on-site. At this time, the Project site contained four structures totaling approximately 120,000 square feet[1] and three above ground storage tanks[2]. Refer to Figures 2, 3, and 4 for views of the Project site.

The discretionary actions that are associated with the project application include:

- Conditional Use Permit to construct buildings that are over 50,000 square feet, and industrial uses within 200 feet of residential uses;
- Vesting Tentative Parcel Map to consolidate 12 existing parcels into three parcels;
- Modified parking request pursuant to a Text Amendment to the Compton Municipal Code under consideration by the City that would allow flexible parking standards for large project sites; and
- Development Agreement.

As shown in Figure 5, Project Site Plan A, and Figure 8, Project Site Plan B (below), the Project involves two potential site plan options, each of which includes the construction of multiple light industrial warehouse/distribution buildings with truck loading doors.

Site Plan A

Project Site Plan A (Figure 5) consists of a 1.43 million square foot light industrial warehouse/distribution building (Building A-1) on the main parcel, with truck loading doors running north/south and a 70,000 square foot light industrial building (Building A-2) off the southern flag lot with single-loaded truck loading doors from the north side. Building A-1 would be set back 67 feet from the property line along Central Avenue and 66 feet from the property line along McKinley Avenue, a minimum of 185 feet from the southwest property line, and 250 feet from the property line along Sam Littleton Street. Building A-2 would be set back 118 feet along the western property line, a minimum 75 feet along northern property line, 44 feet from the eastern property line, and a minimum 44 feet along the south property line. Figures 6 and 7 show the elevations of the Site Plan A buildings. Building A-1 would also include ancillary office space, with its entrance oriented at the southeast corner of the Project site, off Central Avenue. This building would provide 208 truck loading doors and 575 auto stalls. The auto stalls would be located south of Building A-1. In addition, space for storage of 437 shipping containers would be provided north and south of Building A-1 (298 storage spaces north of Building A-1, 139 spaces south of Building A-1). A total of 87 auto stalls would be provided for Building A-2. These stalls would be located to the west and northwest of Building A-2. Building A-2 would have 11 truck loading doors and no storage spaces for shipping containers.

---

[1] *The existing buildings have been removed by the Project Applicant under a separate project (pursuant to a validly issued, ministerial demolition permit) to voluntarily abate imminent health risks associated with the existing buildings. Given the activities which previously took place during the operation of the brickyard, these buildings were characterized by high levels of hazardous asbestos. Under the regulatory cognizance of the South Coast Air Quality Management District (SCAQMD), the buildings were abated and demolished. As a separate ministerial project, the demolition activity and removal of debris are outside the scope of the Project. However, analysis of this activity is provided in relevant sections of this Initial Study for informational purposes.*

[2] *The aboveground storage tanks were removed in June, 2014.*



View 1: View looking west towards a vacant Brick Manufacturing and Drying Building on the Project Site.



View 2: View looking southwest towards a vacant use on the Project Site.



View 3: View looking west towards a vacant office on the Project Site.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.

EcoTierra consulting

Figure 2
Project Site Photos
Views 1, 2, and 3



View 4: View looking southwest towards former mining pit on the Project Site.



View 5: View looking southwest towards a vacant use on the Project Site.



View 6: View looking southwest towards the pipe storage yard and pallets of bricks on the Project Site.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.



View 7: View looking east towards pallets of bricks on the Project Site.



View 8: View looking south towards a vacant use on the Project Site.



View 9: View looking west towards above ground storage tanks on the Project Site.

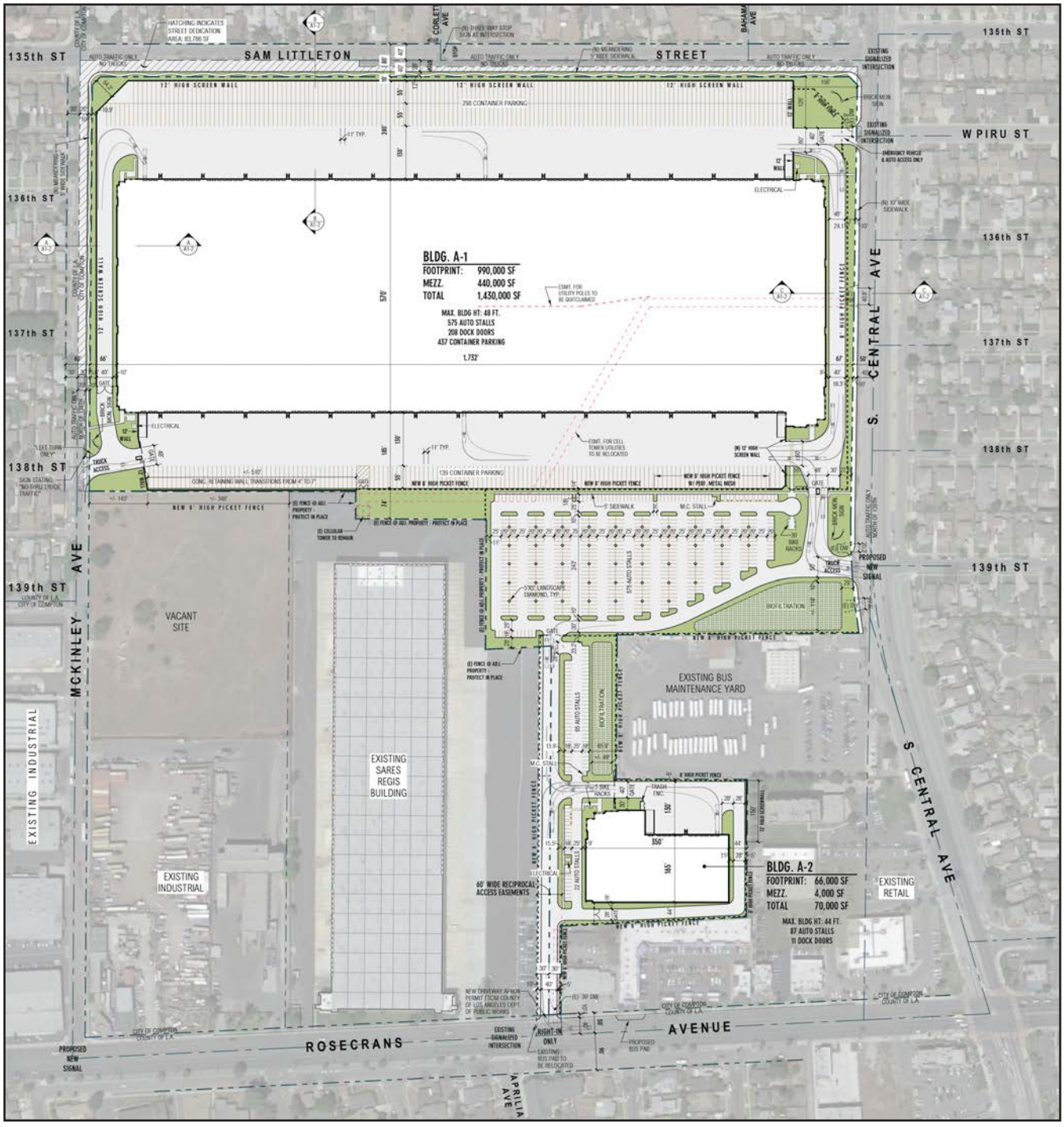


PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.

EcoTierra consulting

Figure 4
Project Site Photos
Views 7, 8, and 9

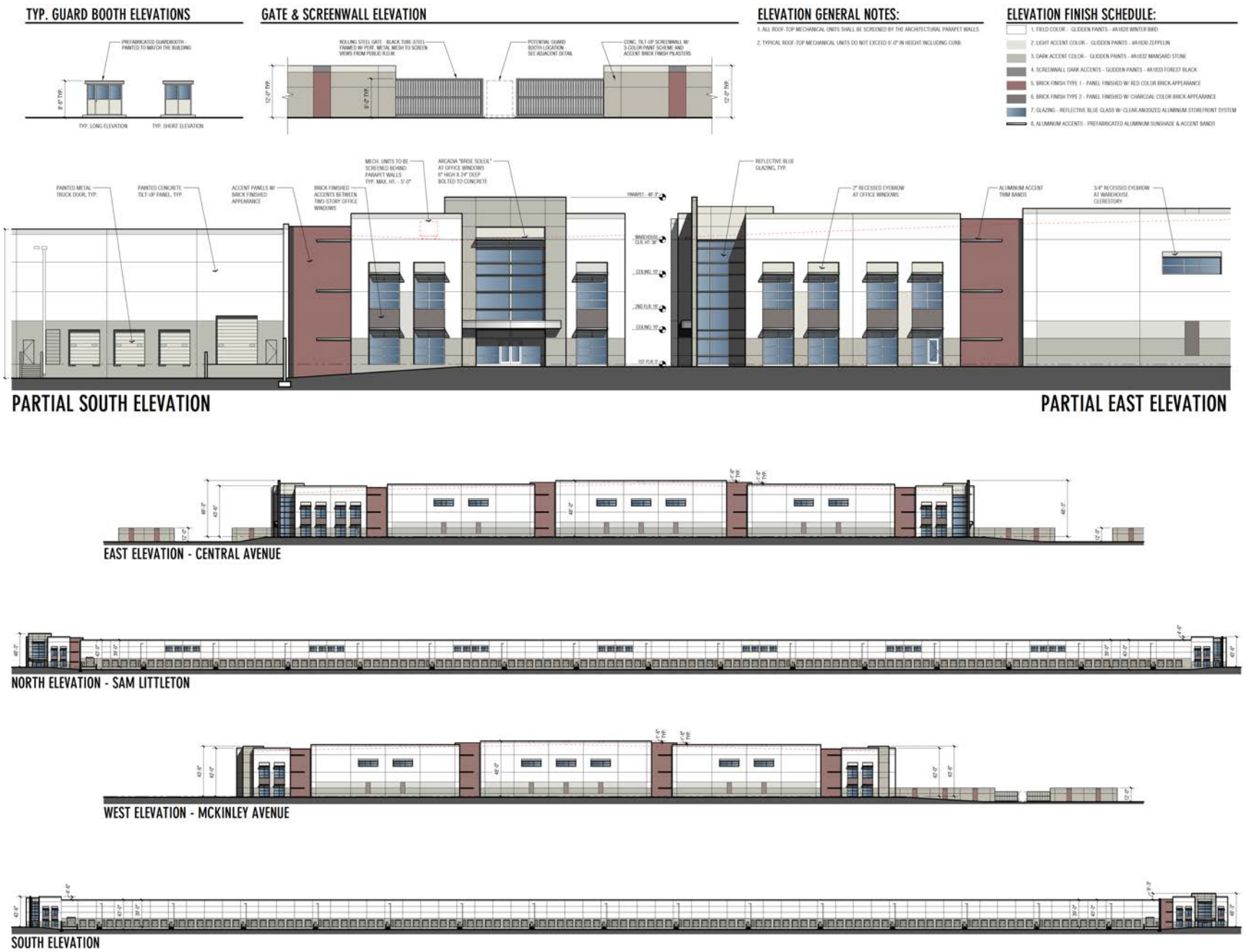


0 200
Scale (Feet)

Source: RGA, 2014.

EcoTierra consulting

Figure 5
Project Site Plan "A"



Source: RGA, 2014.

EcoTierra consulting

Figure 6
Project Site Plan A-Building A-1 Elevation



Source: RGA, 2014.

EcoTierra consulting

Figure
Project Site Plan A-Building A-2 Elevatio

#10.

An enhanced landscape buffer with varied tree species and shrubs would front a 12-foot high screen wall running along the length of the property on McKinley Avenue and Sam Littleton Street. The screenwalls would consist of a decorative concrete wall with a multi-color paint scheme and reveal details. The walls would be set back a minimum of 10 feet from property line. Five gallon shrubs would be planted in front of the base of the wall, and climbing vines are also to be planted. A meandering sidewalk would be provided within the 10-foot landscape buffer area. Parkway landscaping shall include 24-inch box trees at 50-foot on-center spacing[3].

The length of the property on Central Avenue would include eight-foot high black steel picket fencing shielded by a similar landscape buffer, including 5-gallon shrubs planted along the fence line. Building A-2 would be located off the surrounding streets and would include an eight-foot high black steel picket fencing along the property perimeter with landscaping on the north and south edges. The black steel picket fencing would also be located along the eastern perimeter, adjacent to the existing retail use. A 12-foot high screen wall would buffer the eastern edge of the flag lot that is adjacent to the senior apartment facility.

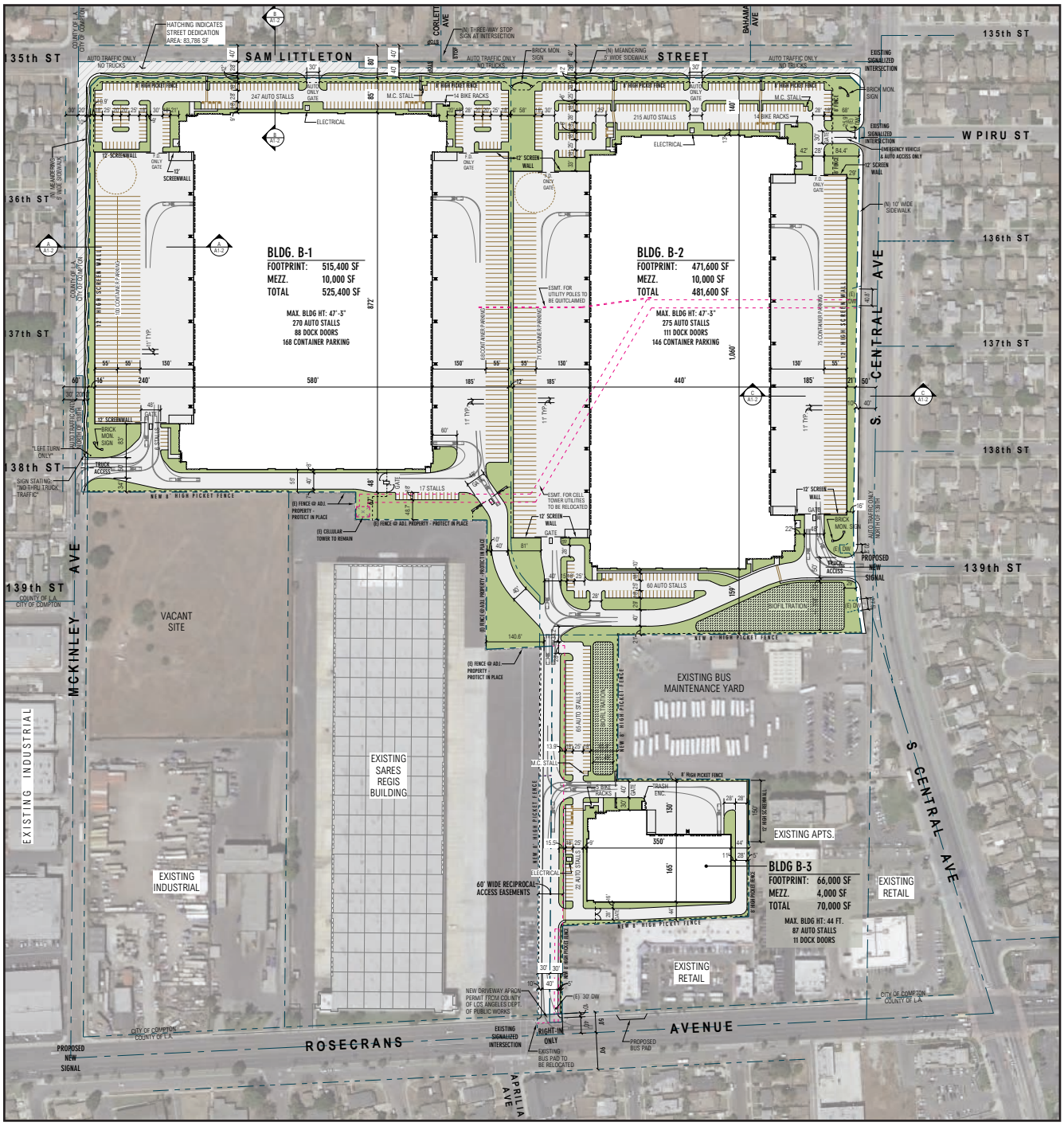
Site Plan B

Project Site Plan B (Figure 8) consists of a 525,400-square foot light industrial warehouse/distribution building (Building B-1) with truck loading doors running east/west on the northwest side of the main parcel; a 481,600-square foot light industrial building (Building B-2) with truck loading doors running east/west on the northeast side of the main parcel; and a 70,000 square foot light industrial building (Building B-3) off the southern flag lot with single-loaded truck loading doors from the north side.

Building B-1 would be set back a minimum of 215 feet from the property line along McKinley Avenue, 55 feet along the south property line, and 85 feet from the property line along Sam Littleton Street. Building B-2 would be set back a minimum of 141 feet from the property line along Central Avenue, 159 feet along the south property line, and 140 feet along the north property line. Building B-3 would be set back 118 feet along the west property line, 75 feet along the north property line, 44 feet from the eastern property line, and 44 feet from the south property line. Figures 9, 10 and 11 show the elevations of Site Plan B buildings.

Building B-1 would include ancillary office space, with an entrance for visitors, along with visitor parking spaces, provided at the southwest corner of the Project site, off McKinley Avenue. Additional employee entrance(s) would be provided at the northeast and/or northwest corners of the building, adjacent to the parking area to the north. This building would provide 88 truck loading doors. Building B-2 would also include ancillary office space, with its an entrance for visitors, along with visitor parking spaces, located at the southwest corner of the building. The vehicle entrance to this parking area would be from Central Avenue. Additional employee entrance(s) would be provided at the northeast and/or northwest corners of the building, adjacent to the parking areas to the north. This building would provide 111 truck loading doors. Building B-3 would have 11 truck loading doors. The proposed project would provide 270 auto stalls for

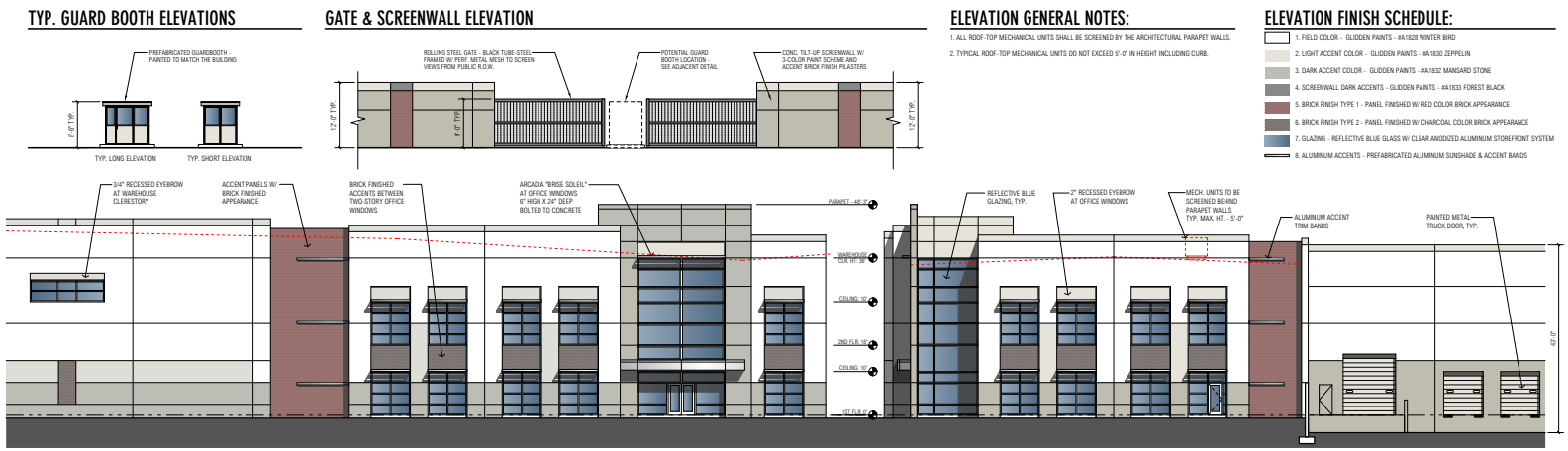
[3] *Per Compton Municipal Code Section 30-43.3e. Parkways. Parkways shall be landscaped with one (1) thirty-six (36') inch box tree for every twenty-five (25') lineal feet of adjacent street frontage in commercial zones and every fifty (50') feet lineal feet of adjacent street frontage in residential and industrial zones, unless alternate parkway landscaping is required by the Architectural Review Board (ARB) or the Department of Public Works (emphasis added). On November 18, 2014, the ARB directed that the Project provide 24 inch box trees at a 50 foot on-center spacing for the following reasons: less water consumption; roots on the smaller 24 inch box trees will take root and stabilize quicker than the larger trees; less long term maintenance; cost savings; need for visual line of sight to provide views for code enforcement; and the proposed tree is an invasive root species therefore will need root balls and root barriers. As alternate standards have been approved by the ARB, no variance or other entitlement would be required.*



Source: RGA, 2014.

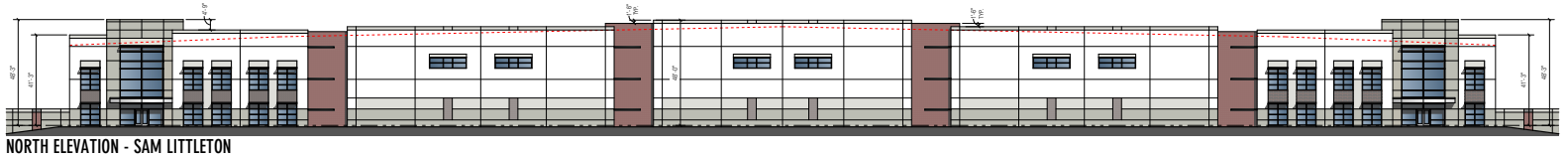
EcoTierra consulting

Figure 8
Project Site Plan "B"



PARTIAL NORTH ELEVATION

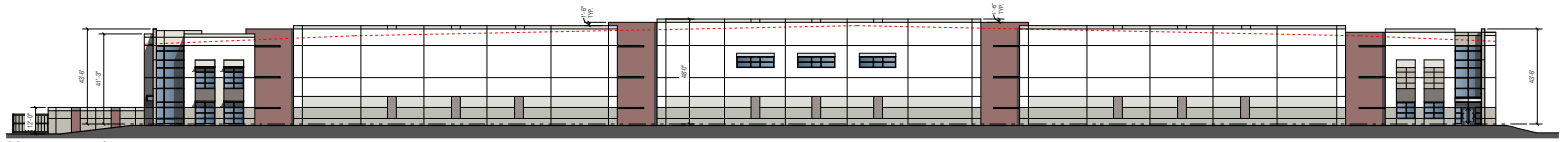
PARTIAL WEST ELEVATION



NORTH ELEVATION - SAM LITTLETON



WEST ELEVATION - MCKINLEY AVENUE



SOUTH ELEVATION

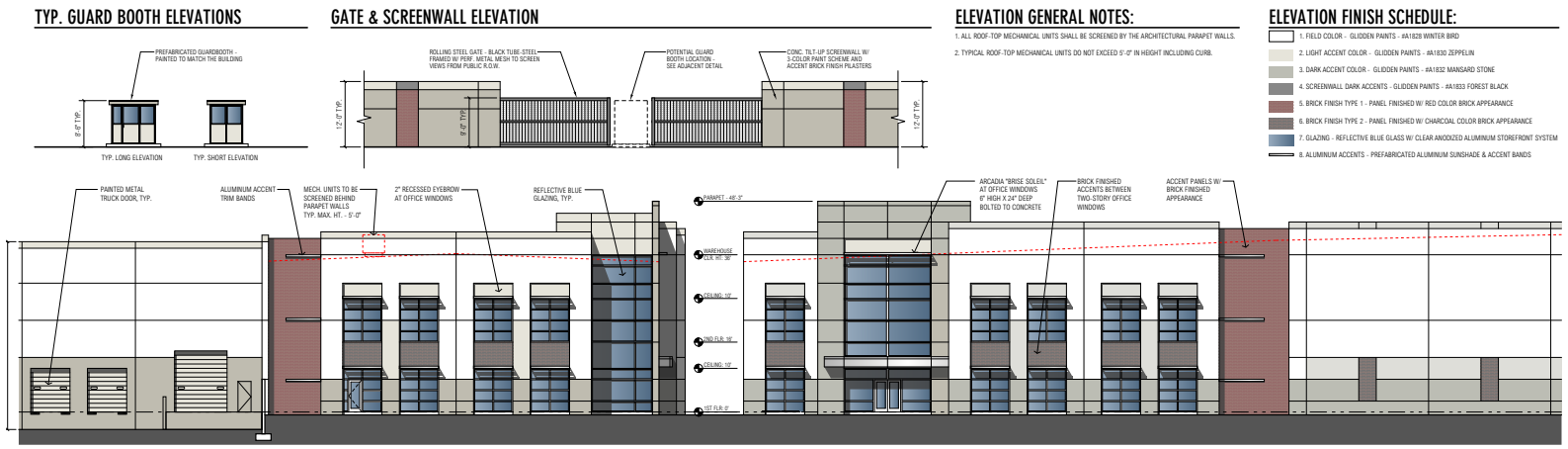


EAST ELEVATION

Source: RGA, 2014.

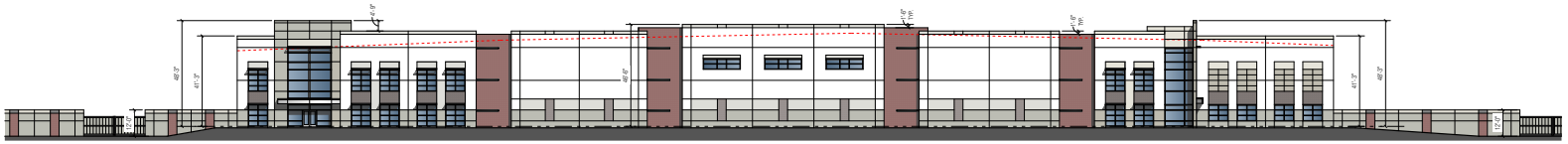
EcoTierra consulting

Figure 9
Project Site Plan B-Building B-1 Elevation



PARTIAL EAST ELEVATION

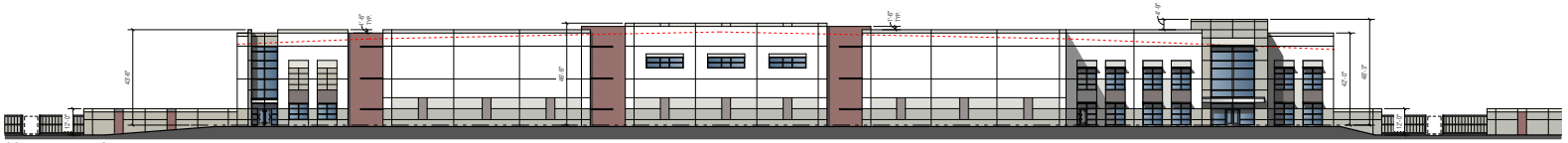
PARTIAL NORTH ELEVATION



NORTH ELEVATION - SAM LITTLETON



WEST ELEVATION



SOUTH ELEVATION



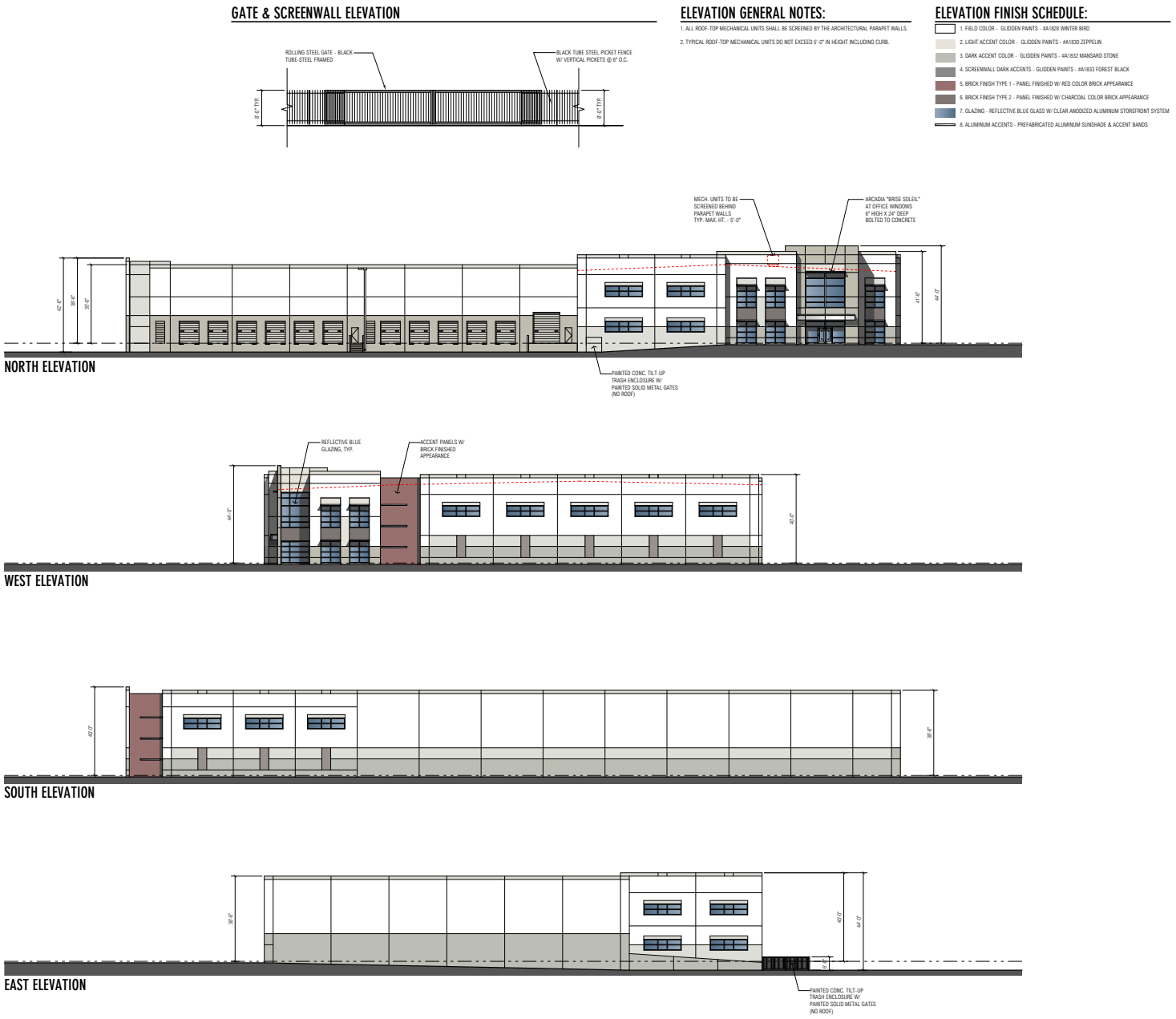
EAST ELEVATION - CENTRAL AVENUE

Source: RGA, 2014.

EcoTierra consulting

Figure 1
Project Site Plan B-Building B-2 Elevatio

#10.



Source: RGA, 2014.

Building B-1, 275 auto stalls for Building B-2, and 87 auto stalls for Building B-3. A total of 314 storage spaces for shipping containers would be provided under this plan – 100 west of Building B-1, 139 between Building B-1 and Building B-2, and 75 east of Building B-2.

An enhanced landscape buffer with varied tree species and shrubs would front a 12-foot high screen wall, which would shield the truck courts along McKinley Avenue and Central Avenue. The screenwalls would consist of a decorative concrete wall with a multi-color paint scheme and reveal details. The walls would be set back a minimum of 10 feet from property line. Five gallon shrubs would be planted in front of the base of the wall, and climbing vines are also to be planted. A meandering sidewalk would be provided within the 10-foot landscape buffer area. As noted above, parkway landscaping shall consist of 24-inch box trees at 50-foot on-center spacing per direction by the ARB. The length of the property on Sam Littleton Street would include eight-foot high black steel picket fencing shielded by a similar landscape buffer. Building B-3 would be located off the surrounding streets and include eight-foot high black steel picket fencing along the property perimeter with landscaping on the north and south edges. The black steel picket fencing would also be located along the eastern perimeter, adjacent to the existing retail use. A 12-foot high screen wall would buffer the eastern edge of the flag lot that is adjacent to the residential building.

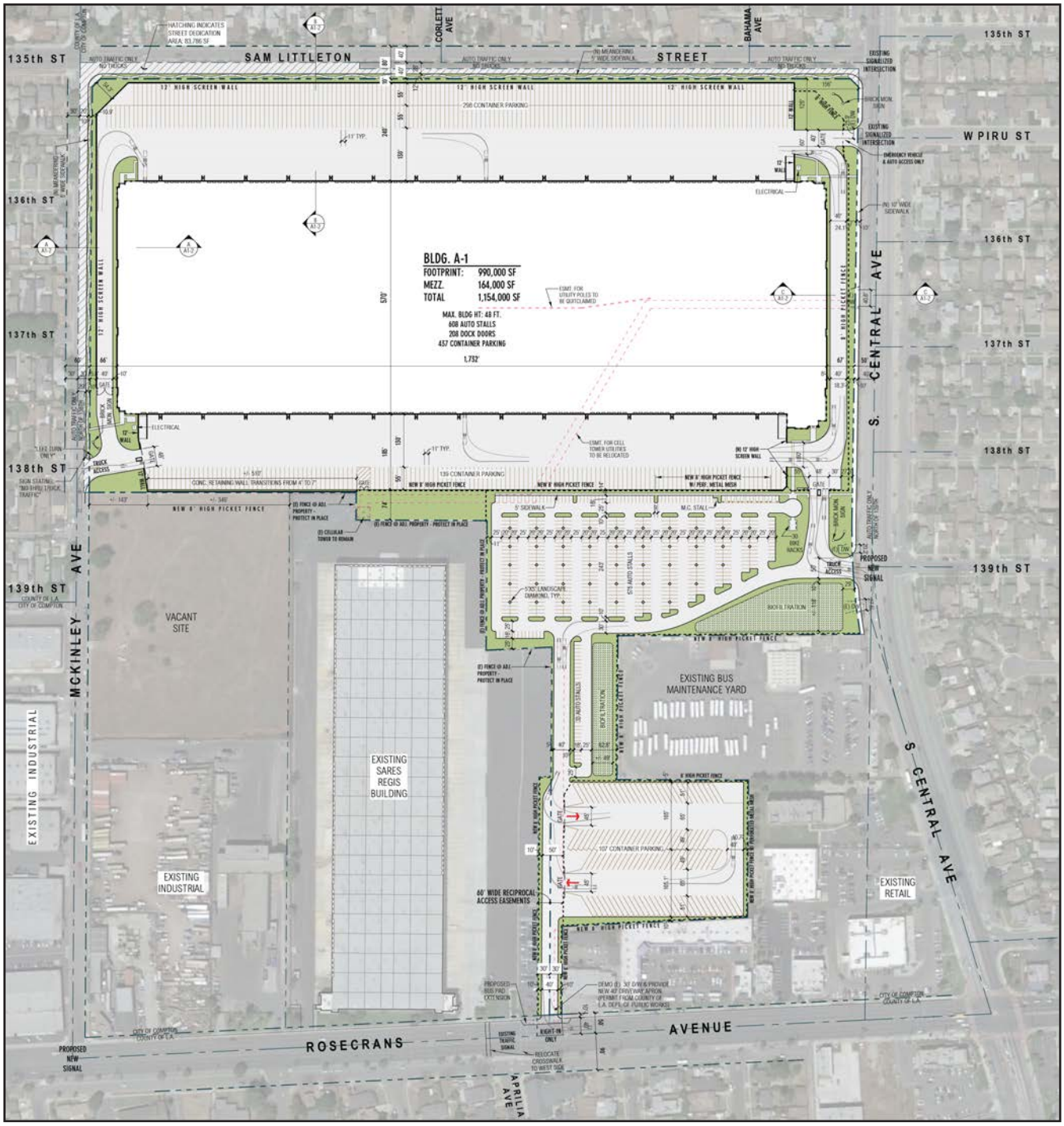
Under both Site Plan A and Site Plan B, the Project could include import and export of up to 30,000 cubic yards of dirt in conjunction with project construction. The prospective haul route would utilize the segment of Central Avenue between the existing entrance to the Project Site and Rosecrans Avenue to access the Harbor Freeway (I-110)[4], with potential ultimate disposal of soil at the Bradley Landfill in Sun Valley and/or the Sunshine Canyon Landfill in Sylmar.

Revised Site Plan A

Revised Project Site Plan A (Figure 5a) consists of a single 1.154 million square foot light industrial/warehouse/distribution building (Building A-1) on the main parcel, with truck loading doors running north/south. Building A-1 would be set back 65 feet from the east property line, 66 feet from the west property lines, a minimum of 185 feet from the southwest property line, and 250 feet from the north property line. Under this plan, Building A-1 would include ancillary office space, with its entrance oriented at the southeast corner of the Project site, off Central Avenue. This building would provide 208 truck loading doors and 608 auto stalls. The auto stalls would be located south of Building A-1. In addition, space for storage of 437 shipping containers would be provided north and south of Building A-1 (298 storage spaces north of Building A-1, 139 spaces south of Building A-1). Approximately 107 storage spaces for shipping containers would be provided within the southern flag lot.

An enhanced landscape buffer with varied tree species and shrubs would front a 12-foot high screen wall running along the length of the property on McKinley Avenue and Sam Littleton Street. The length of the property on Central Avenue would include eight-foot high black steel picket fencing shielded by a similar landscape buffer. The southern flag lot would be located off the surrounding streets and would include an eight-foot high black steel picket fencing with metal mesh along the property perimeter with landscaping on the north and south edges. Under the Revised Site Plan A, landscaping, sidewalks and paths adjacent to the Project site would be the same as provided under Site Plan A.

[4] *This segment is currently being used for the import of dirt associated with the reverse mining operation.*



0 200
Scale (Feet)

Source: RGA, 2015.

Figure 5(a)
Revised Project Site Plan "A"

Revised Site Plan B

Revised Project Site Plan B (Figure 8a) would also include 1.154 million square feet of building area, consisting of a 582,400 square foot light industrial warehouse/distribution building (Building B-1) with truck loading doors running east/west on the northwest side of the main parcel; and a 571,600-square foot light industrial building (Building B-2) with truck loading doors running east/west on the northeast side of the main parcel.

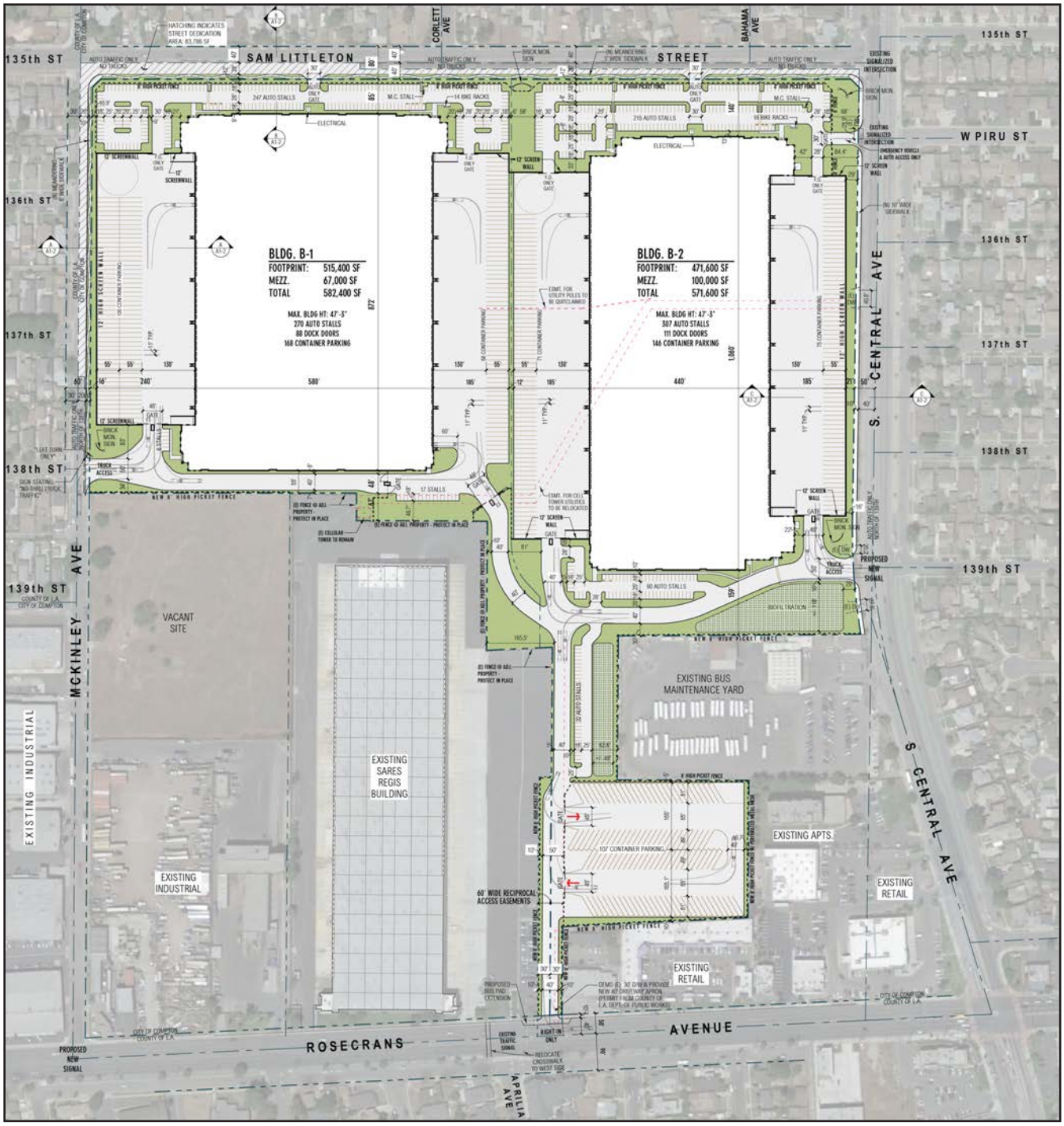
Building B-1 would be set back a minimum of 256 feet from the west property line, 55 feet along the south property line, and 85 feet from the north property line. Building B-2 would be set back a minimum of 206 feet from the east property line, 159 feet along the south property line, and 140 feet along the north property line.

Building B-1 would include ancillary office space, with an entrance for visitors, along with visitor parking spaces, provided at the southwest corner of the Project site, off McKinley Avenue. Additional employee entrance(s) would be provided at the northeast and/or northwest corners of the building, adjacent to the parking area to the north. This building would provide 88 truck loading doors. Building B-2 would also include ancillary office space, with an entrance for visitors, along with visitor parking spaces, located at the southwest corner of the building. The vehicle entrance to this parking area would be from Central Avenue. Additional employee entrance(s) would be provided at the northeast and/or northwest corners of the building, adjacent to the parking areas to the north. This building would provide 111 truck loading doors. Revised Site Plan B would provide 270 auto stalls for Building B-1, and 307 auto stalls for Building B-2. A total of 314 storage spaces for shipping containers would be provided under this plan – 100 west of Building B-1, 139 between Building B-1 and Building B-2, and 75 east of Building B-2. Approximately 107 storage spaces for shipping containers would be provided within the southern flag lot.

An enhanced landscape buffer with varied tree species and shrubs would front a 12-foot high screen wall, which would shield the truck courts along McKinley Avenue and Central Avenue. The length of the property on Sam Littleton Street would include eight-foot high black steel picket fencing shielded by a similar landscape buffer. The black steel picket fencing would also be located along the eastern perimeter, adjacent to the existing retail use. The southern flag lot is located would be secured by eight-foot high black steel picket fencing with metal mesh with landscaping within. Under the Revised Site Plan B, landscaping, sidewalks and paths adjacent to the Project site would be the same provided under Site Plan B.

Under both Revised Site Plan A and Revised Site Plan B, all buildings would be single story with mezzanine and up to 52 feet in height, which is under the MH zone's 75 foot height limit. The proposed new construction for Revised Site Plans A and B will consist of permitted light industrial uses, and will comply with the maximum floor area (0.75:1) allowed under the 1991 General Plan, and the Heavy Manufacturing (MH) zone's 50 percent parcel coverage limitation. Specifically, development on Revised Site Plan A would cover approximately 40% of the net area of the Project site, with a floor area ratio (FAR) of approximately 0.47:1 based on the net area of the Project site. Revised Site Plan B would cover approximately 40% of the net area, with FAR approximately 0.47:1 based on net area.

Similar to Site Plans A and B, due to the size and unique function of the Project, parking will be provided for both Revised Site Plans A and B to meet anticipated parking demand. Both Revised Site Plans include a modified parking request pursuant to a proposed Text Amendment to the Compton Municipal Code (CMC) currently under consideration by the City that would allow flexible parking standards for large project sites.



Source: RGA, 2015.

0 200
Scale (Feet)

N

EcoTierra consulting

Figure 8(a)
Revised Project Site Plan "B"

Should Revised Site Plan A or Revised Site Plan B logistics and e-commerce oriented facilities, these facilities would operate 24 hours per day, 7 days per week. As with Site Plan A and Site Plan B, the Project buildings and the Project site have been designed to internalize business operations and provide buffering between the Project site and surrounding neighborhoods.

Land Use and Zoning

The proposed new construction for Site Plans A and B will consist of permitted light industrial uses, and will comply with the maximum floor area (0.75:1) allowed under the 1991 General Plan, and the Heavy Manufacturing (MH) zone's 50 percent parcel coverage limitation. Specifically, development on Site Plan A would cover approximately 42% of the gross area of the Project site (approximately 43% of the net area[5]), with a floor area ratio (FAR) of approximately 0.60:1 based on gross area, and approximately 0.61:1 based on net area. Site Plan B would cover approximately 41% of the gross area of the Project site (approximately 43% of the net area), with FAR approximately 0.42:1 based on gross area and approximately 0.44:1 based on net area. The proposed buildings, under both site plan options, would be single-story with mezzanine, and up to a maximum of 52 feet in height, which is under the MH zone's 75 foot height limit. Figure 12 shows renderings of the expected appearance of project buildings under both Site Plan A and Site Plan B.

Parking

Due to the size and unique function of the Project, parking will be provided for both Site Plans A and B to meet anticipated parking demand. However, the parking proposed does not meet the City code minimum of 1 space per 850 square feet, which would require the Project to provide 1,764 spaces. The Project includes a modified parking request pursuant to a proposed Text Amendment to the Compton Municipal Code (CMC) currently under consideration by the City that would allow flexible parking standards for large project sites. The proposed Text Amendment currently under consideration by the City would permit the establishment of a Modified Parking Requirement (MPR) District under which a parking demand study would be prepared to the satisfaction of the Planning Department, and the Planning Commission would be required to find that the Project's MPR District provides adequate parking within the proposed district boundaries to meet parking demand for the facilities or uses located within the district, and that the minimum parking required based on a parking demand study is desirable to promote economic development and is in the interest of the public welfare. In total, 662 parking spaces will be provided for Site Plan A located primarily within a large surface lot containing approximately 575 spaces near the center of the Project site. Remaining Site Plan A parking will be provided in two smaller lots, including an approximately 22-space lot adjacent to Building A-2, and an approximately 65 space lot located to the north, between the Building A-2 parking lot and the large main lot. For Site Plan B, a total of 632 parking spaces would be provided for the three proposed buildings (i.e., 270 spaces for Building B-1, 275 spaces for Building B-2 and 87 spaces for Building B-3).

Both Site Plans A and B provide parking for employees and visitors primarily at the north, and/or southeast ends of the main parcel (with the exception of Buildings A-2 or B-3, where adjacent parking is provided). Bicycle parking would be provided in a designated, secured area for each building. Parking lots would include landscaping and LED lighting to ensure minimal light pollution while providing security for employees and visitors.

[5] *Net area is the area of the Project site after roadway dedications.*



CORNER OF S. CENTRAL & 139 EXISTING



PROPOSED SITE PLAN SCHEME A



PROPOSED SITE PLAN SCHEME A



CORNER OF S. CENTRAL & 135TH EXISTING



PROPOSED SITE PLAN SCHEME A



PROPOSED SITE PLAN SCHEME A

Source: RGA, 2014.

EcoTierra consulting

Figure 12
Project Site Plan A and B-Renderings

For Site Plans A and B, the main truck entrance to the Project site would be provided at the intersection of Central Avenue and E. 139th Street, with an entry monument, the primary project-identifying signage, and a new traffic signal at this location. Under Site Plan A, both visitors and employees would access the main parking lot from this entrance. An additional automobile and emergency vehicle entrance (no truck access) would be provided from Central Avenue at W. Piru Street, which is presently served by a traffic signal. Under Site Plan B, this gate would serve as an alternate entrance for employees accessing the parking areas to the north of the buildings. Under Site Plan B, two additional automobile-only entrances would be provided from Sam Littleton Street, which would also provide access to these parking areas. For Site Plans A and B, truck access would be provided from the main entrance on Central Avenue, from McKinley Avenue at the southwest corner of the Project site, and from Rosecrans Avenue (ingress only at this location) via a driveway situated between the Flag Lot and Rosecrans Avenue. Truck ingress/egress and yard dimensions would accommodate truck and trailer lengths up to 65 feet in length. Fenced and lit yard areas would secure full concrete truck courts, with dock high loading doors, which would be concealed from view by a combination of landscaping and screen walls. Should the Project include logistics and e-commerce oriented facilities, these facilities would operate 24 hours per day, 7 days per week. Therefore, the Project buildings and the Project site have been designed to internalize business operations and provide buffering between the Project site and surrounding neighborhoods.

As shown in Figures 5/5a (Project Site Plan A) and 8/8a (Project Site Plan B), the Project would include multiple Standard Urban Stormwater Management Plan (SUSMP) filtration planter areas throughout the Project site. The SUSMP filtration planters will treat and detain runoff from the Project. In addition, the Project would upgrade an existing sewer line to accommodate wastewater flows from the Project.

As part of the Project, the following public improvements are proposed to be constructed:

McKinley Avenue is proposed to be widened from 20 feet curb-to-curb to 40 feet curb-to-curb (a 100% increase in width), subject to City and County of Los Angeles input and approval, by improving the east half of the street, from just south of E. 138th Street to Sam Littleton Street. The pavement on the westerly side of McKinley Avenue will be reconstructed from Rosecrans Avenue to Sam Littleton Street. A 10-foot parkway with a 5-foot meandering sidewalk would be added to the east side of McKinley Avenue along the newly widened road. A curb cut would be added at E. 138th Street to allow truck ingress/egress to and from the property. The Project proposes to add a traffic signal to the intersection of McKinley and Rosecrans Avenues.

Sam Littleton Street is proposed to be widened from 28 feet curb-to-curb to 56 feet curb-to-curb (a 100% increase in width), subject to City input and approval, by improving the south half of the street, from McKinley Avenue to Central Avenue. A 12-foot parkway with a 5-foot meandering sidewalk would be added to the south side of Sam Littleton Street along the newly widened road. Site Plan B includes the addition of two curb cuts for auto only ingress/egress to and from the property along the south side of Sam Littleton Street. Three-way stop signs will be installed at the intersection of Corlett Avenue and Sam Littleton Street.

A 10-foot sidewalk would be provided along the west side of Central Avenue from Sam Littleton Street to just south of E. 139th Street. Two curb cuts would be added – at W. Piru Street for auto and emergency vehicle ingress/egress (no truck access) to and from the property and at E. 139th Street for truck and automobile ingress/egress to and from the property. The Project proposes to add a traffic signal to Central Avenue at E. 139th Street to facilitate safe truck and auto ingress/egress.

The existing driveway to Rosecrans Avenue from the south end of the flag lot area of the Project site is proposed to be widened and improved to accommodate truck and auto access, with right turn in movements permitted.

9. Surrounding Land Uses and Setting: (*Briefly describe the project's surroundings*)

The area of Compton that includes the Project site is characterized by urban development including a mix of commercial, industrial, and residential land uses. The following paragraphs describe the specific land uses in the vicinity of the Project site. Figures 13 through 15 depict views of the land uses surrounding the Project site.

The areas north and east of the Project site are zoned Low Density Residential (RL). The properties that adjoin the Project site to the southeast and southwest are zoned Heavy Manufacturing (MH). The areas to the west and south of the Project site are located within the unincorporated West Rancho Dominguez Victoria community of Los Angeles County. The areas west of the Project site are zoned Light Manufacturing (M-1), Single-Family Residential (R-1), and Two-Family Residential (R-2) by the County of Los Angeles. The areas to the south of the Project site are zoned Single-Family Residential (R-1), Restricted Business (C-1), and Unlimited Commercial (C-3-DP) by the County of Los Angeles.

The Project site is part of the 104 acre 'Brickyard' superblock, bordered by Sam Littleton Street, Central Avenue, Rosecrans Avenue and McKinley Avenue and designated as "Mixed Use" by the current 1991 City of Compton General Plan. This superblock currently has a mix of uses including multi-family residential, retail, service/commercial, and light industrial. A largely unoccupied retail center, with a remnant residential use behind it, is located at the southern edge of the central portion of the superblock. Two new industrial projects are proposed at the southwestern edge of the Project site within the superblock. These include a 100,000 square foot industrial building at the northeast corner of Rosecrans and McKinley Avenues on the site of the existing recycling center, and a 145,800 square foot industrial building on a vacant site off McKinley Avenue just south of the Project site.

Directly north of the Project site, across Sam Littleton Street, and directly west of the Project site, across McKinley Avenue, are single-family residences. Southwest of the Project site, across McKinley Avenue, are six single-story light industrial buildings. Additional single-family residential uses are located southwest of the Project site, on the south side of Rosecrans Avenue. Directly south of the Project site, abutting the southern property line, are a vacant lot, a recycling center, a large warehouse facility, and a shopping center. A multi-story senior housing facility is located just to the north of the shopping center, with a bus maintenance facility located between the senior housing facility and the Project site. The proposed light industrial use on the Project site would be consistent with the General Plan Mixed Use designation given the diversity of surrounding uses located within and around the Brickyard superblock.

South of these uses, across Rosecrans Avenue, are multi-family residential uses, two churches, a vacant lot, a vacant commercial use, and a fast food restaurant. Southeast of the Project site, across Rosecrans Avenue, is a shopping center. Directly east of the Project site, across Central Avenue, is a fast food restaurant (Tams) and single-family residences.



View 1: View looking west from Sam Littleton Street towards single-family residences.



View 2: View looking south from McKinley Avenue towards light industrial uses.



View 3: View looking northwest from West Rosecrans Avenue toward home improvement/recycling center.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.



View 4: View looking north from West Rosecrans Avenue toward solid waste transfer station.



View 5: View looking northeast from West Rosecrans Avenue toward a light industrial building.



View 6: View looking southeast from West Rosecrans Avenue towards a McDonalds fast food restuarant.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.



View 7: View looking south on Central Avenue towards commercial uses at the intersection of Central Avenue and West Rosecrans Avenue.



View 8: View looking south on Central Avenue towards a commercial shopping center.



View 9: View looking northeast on Central Avenue towards single-family residences.



PHOTO LOCATION MAP

Source: EcoTierra Consulting, June 2014.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement.):

The City of Compton is the lead agency for the Project. Responsible agencies may include, without limitation:

- South Coast Air Quality Management District
- Regional Water Quality Control Board
- County of Los Angeles Fire Department, Health Hazardous Materials Division, Site Mitigation Unit
- City of Compton Municipal Water Department and/or Park Water Company
- Los Angeles County Department of Public Works.

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below (X) would be potentially affected by this project, involving at least one impact that is a Potentially Significant Impact as indicated by the checklist on the following pages.

	Aesthetics		Greenhouse Gas Emissions		Population/Housing
	Agricultural Resources		Hazards & Hazardous Materials		Public Services
	Air Quality		Hydrology/Water Quality		Recreation
	Biological Resources		Land Use/Planning		Transportation/Traffic
	Cultural Resources		Mineral Resources		Utilities/Service Systems
	Geology/Soils		Noise		Mandatory Findings of Significance

III. DETERMINATION:

On the basis of this Initial Study of Environmental Impact, the City of Compton finds the following:

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

Robert Delgadillo
Planning Manager
City of Compton

#10.

The following analyses evaluate the potential environmental effects of Revised Site Plan A and Revised Site Plan B. Section 15073.5 of the CEQA Guidelines (Guidelines) establishes the conditions under which a negative declaration must be substantially revised and recirculated prior to its adoption. Under Guidelines Section 15073.5(b), a substantial revision of a negative declaration includes:

(1) A new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

Guidelines Section 15073.5(c)(2) indicates the recirculation is not required when new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.

As demonstrated in the following section, none of the criteria for recirculation of this IS/MND have been met, and recirculation of the IS/MND is not required under Guidelines section 15073.5.

IV. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17, "Earlier Analysis," may be cross-referenced).

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (d). In this case, a brief discussion should identify the following:

   (a) Earlier Analysis Used. Identify and state where they are available for review.
   (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from

the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

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

#10.

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?			x	
b) Substantially damage scenic resources, including, but not limited to, limitation trees, rock outcroppings, and historic buildings within a state scenic highway?			x	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?		x		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		x		
2. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project?				
a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?				x
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				x
c) Involve other changes in the existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				x
d) Result in the loss of forest land or conversion of forest land to non-forest use?				x
e) Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				x
3. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			x	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation.		x		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			x	
d) Expose sensitive receptors to substantial pollutant concentrations?			x	

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e) Create objectionable odors affecting a substantial number of people?			x	
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?				x
b) Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Wildlife Service?				x
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?				x
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				x
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			x	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		x		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		x		
d) Disturb any human remains, including those interred outside of formal cemeteries?		x		
6. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			x	

#10.

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(ii) Strong seismic ground shaking?			x	
(iii) Seismic-related ground failure, including liquefaction?			x	
(iv) Landslides?			x	
(b) Result in substantial soil erosion or the loss of topsoil?			x	
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			x	
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		x		
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				x
7. GREENHOUSE GAS EMISSIONS				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			x	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			x	
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project?				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?			x	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?			x	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			x	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would it create a significant hazard to the public or the environment?			x	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			x	

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				x
g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?			x	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				x
9. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?			x	
b) Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			x	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			x	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site?			x	
e) Create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		x		
f) Otherwise substantially degrade water quality?			x	
g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				x
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				x
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				x
j) Inundation by seiche, tsunami, or mudflow?				x
10. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				x

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			x	
c) Conflict with any applicable habitat conservation plan or natural communities' conservation plan?				x
11. **MINERAL RESOURCES.** Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x
12. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		x		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			x	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			x	
d) A substantially temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			x	
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				x
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				x
13. **POPULATION AND HOUSING.** Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			x	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				x
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				x

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			x	
b) Police protection?		x		
c) Schools?		x		
d) Parks?			x	
e) Other public facilities?			x	
15. RECREATION.				
a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			x	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			x	
16. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrians and bicycle paths, and mass transit?		x		
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			x	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				x
d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			x	
e) Result in inadequate emergency access?			x	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?		x		

Issues and Supporting Information	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
17. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			x	
b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			x	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			x	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			x	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			x	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		x		
g) Comply with federal, state, and local statues and regulations related to solid waste?			x	
18. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				x
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?		x		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				x

V. ANSWERS TO INITIAL STUDY QUESTIONS

1. AESTHETICS

a) Have a substantial adverse effect on a scenic vista?

Less-than-Significant Impact. The Project site itself does not contain any unique natural or urban features or views of which might be considered valuable. Similarly, the Project site is located in a highly developed portion of the Los Angeles metropolitan region within the City of Compton. The Project site does not afford views of scenic vistas due to its location in a relatively flat area of the City of Compton and surrounding development and landscaping. Additionally, no visual resources such as topographic or scenic features are located in the vicinity of the Project site. Public areas in the vicinity of the Project site are limited to area roadways. Accordingly, a less than significant impact would occur and no mitigation measures are required.

Revised Site Plan A

Less-than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not afford views of scenic vistas due to its location in a relatively flat area of the City of Compton and surrounding development and landscaping. No visual resources such as topographic or scenic features are located in the vicinity of the Project site. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not afford views of scenic vistas due to its location in a relatively flat area of the City of Compton and surrounding development and landscaping. No visual resources such as topographic or scenic features are located in the vicinity of the Project site. Impacts would be less than significant and no mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less-Than-Significant Impact. The Project site is not located along a State scenic highway. The Project site and the surrounding area are completely urbanized; the Project site does not contain rock outcroppings. As discussed in the responses to Questions 4(a) through 4(f), there is no vegetation on the Project site aside from non-native trees that are not protected tree species. These trees are primarily located along the perimeter of the Project site and would be replaced by planned landscaping. Additionally, as discussed in the response to Question 5(a), there are no historic buildings existing on the Project site. Therefore, the Project would not substantially damage scenic resources, including, without limitation, trees, rock outcroppings, and historic buildings within a state scenic highway. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project would not substantially damage scenic resources, including, without limitation, trees, rock outcroppings, and historic buildings within a state scenic highway. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project would not substantially damage scenic resources, including, without limitation, trees, rock outcroppings, and historic buildings within a state scenic highway. Impacts would be less than significant and no mitigation measures are required.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less-Than-Significant With Mitigation Incorporated. The visual character of the area surrounding the Project site is that of a highly developed urban area. Single- and multi-story commercial and industrial buildings, and single- and multi-family uses, as well as transportation infrastructure, are present within the vicinity of the Project site. A five-story senior housing building is located to the east of the Project site. Single family housing areas are located to the east, north, south, and west of the Project site. Overall, there is little uniformity in the development in the vicinity. However, most buildings are low- to mid-rise structures. The interior of the Project site is generally not visible from the surrounding areas because of existing landscaping. However, there are areas along the Project site boundary where there is no landscaping and the existing condition of the Project site can be seen from outside. In addition, the primary entrance to the Project site presently consists of a dirt road with a chain link fence gate.

Construction Impacts

Construction activities typically include both a disturbance in existing natural and man-made features and the development of structures, which, at least temporarily, are devoid of external treatments designed to improve visual character. Project construction activities would introduce a new structures and a variety of equipment onto the Project site, potentially including scaffolding, cranes, and support vehicles. Existing trees and landscaping on the Project site boundary would be removed during construction, allowing the Project site to be viewed from surrounding areas. Implementation of the mitigation measures below, which require screening of the construction area, would help to reduce impacts to visual character related to construction activities. Further, the impact due to construction itself would be temporary. Visual impacts during construction would be less than significant with mitigation.

MM AE-1. The c*onstruction area shall be screened with appropriate material of sufficient height (e.g., temporary fencing with opaque material) to screen views of the construction site.*

MM AE-2. *Construction equipment staging areas shall be located at least 150 feet from the existing parcel's western and northern property line, and the eastern boundary of the flag lot to reduce visual impacts of construction equipment, trailers and materials on the adjacent single family residences located to the west and north of the project site, and the senior housing facility located to the east of the flag lot. Staging locations compliant with this distance requirement shall be identified on the Final Development Plans and Grading Plans.*

Operational Impacts

The Project would involve the construction of new warehouse/light industrial building(s). The new building(s) would be of a contemporary design and would represent an increase in the intensity of development on the Project site. Landscaping and screenwalls would be provided along the boundaries of the Project site that would buffer the view of the Project after construction, which would represent an improvement over those areas that presently have views onto the Project site.

Previous views of the site encompassed obsolete and dilapidated buildings of generally poor visual quality, largely devoid of any landscaping or visual buffer.

Site Plan A

Under Site Plan A, McKinley Avenue and Sam Littleton Street would be screened with a combination of landscaping and decorative screenwalls. Trees would consist of 24-inch boxes, spaced 50 feet apart, with 15 gallon trees between. The screenwalls would consist of a minimum 12 foot high decorative concrete screenwall with a multi-color paint scheme and reveal details. The walls would be set back a minimum of 10 feet from property line. Five gallon shrubs would be planted in front of the base of the wall at approximately 6 feet on center, and climbing vines are also to be planted every 8 feet on center. A meandering sidewalk would be provided within the 10-foot landscape buffer area, which would reinforce the visual quality of the landscaping scheme as perceived from McKinley Avenue and Sam Littleton Street.

Along Central Avenue, screening would consist of 24-inch box trees at 35-foot spacing. The majority of this frontage faces the short end of Building A-1 which is articulated with brick and glass, so no solid screenwall would be necessary. The Project Applicant is proposing to provide a decorative 8-foot high black steel picket fence, with 5-gallon shrubs planted along the fence line. The proposed screening would be sufficient to block views into the Project site, including parking areas, storage areas and truck operating areas, from adjoining public rights-of-way.

Site Plan B

Under Site Plan B, McKinley Avenue would be screened with a combination of landscape and decorative screenwall. Trees would consist of 24-inch boxes, spaced 50 feet apart, with 15 gallon trees between. The screenwalls would consist of a minimum 12-foot high decorative concrete screenwall with a multi-color paint scheme and reveal details. The wall would be set back a minimum of 10 feet from the property line. Five gallon shrubs would be planted in front of the base of the wall at approximately 6 feet on center, and climbing vines are also to be planted every 8 feet on center.

Along Sam Littleton Street, trees would consist of 24-inch boxes, spaced 50 feet apart, with 15 gallon trees between. This frontage faces the office ends of the two proposed buildings which are articulated with brick and glass and do not require screening. The Project Applicant is proposing to provide a decorative 8-foot high black steel picket fence with 5-gallon shrubs planted along the fence line. A meandering sidewalk would be provided within the 10-foot landscape buffer areas, which would reinforce the visual quality of the landscaping scheme as perceived from McKinley Avenue and Sam Littleton Street.

Along Central Avenue, screening would consist of 24-inch box trees at 35-foot spacing in front of a minimum 12-foot high decorative concrete screenwall with a multi-color paint scheme and reveal details. The wall would be set back a minimum of 10 feet from property line. Five gallon shrubs would be planted in front of the base of the wall at approximately 6 feet on center, and climbing vines would also be planted every 8 feet on center. The proposed screening would be sufficient to block views into the Project site, including parking areas, storage areas and truck operating areas, from adjoining public rights-of-way.

Under both Site Plans, a 12-foot high screenwall would be constructed on the eastern perimeter of the flag lot that adjoins the senior housing building to the east. The western end of the senior housing building, which faces the Project site, does not have any windows facing this part of the Project site. A line of mature trees is located along the northern property line of this building, which screens views of the bus maintenance facility to the north and would also screen views of the main Project buildings to the north. However, it is possible that the uppermost floors (Floors 4 & 5) of the senior housing facility could have a view of the main project buildings on the northern portion of the Project site (Building A-1 under Site Plan A; and Building B-1 and B-2 under Site

Plan B). At these locations, the view of obsolete and dilapidated buildings within the Project site would be replaced with a view of light industrial warehouse building(s) and associated roadways and parking areas, along with coordinated landscaping and signage. While this change in view could potentially be perceived as beneficial, at a minimum the change in visual appearance of the Project site from these vantage points would not represent a substantial change in the visual appearance of the Project site, which previously contained large, dilapidated, corrugated metal buildings, brick pallets, pipe storage and dirt roadways throughout the site. Impacts related to the visual appearance of the Project site as perceived from the senior housing facility would, therefore, be less than significant.

Presently, consistent clear views onto the Project site are not provided from McKinley Avenue or Sam Littleton Street because of existing fencing and landscaping. There are intermittent views of the Project site along parts of these streets where no landscaping is present. These views consist of vacant areas of the Project site, the clay pit that is currently being backfilled with soil under the ongoing reverse mining operation, and, prior to their demolition, the obsolete and dilapidated buildings associated with the previous brick manufacturing operation. Visual qualities associated with these existing views of the Project site are generally poor. Implementation of the Project would replace the existing unsightly views of the site with views of the walls, generous landscaping, and meandering sidewalk proposed to be developed at the Project site boundary, as well as intermittent views of the tops of Project buildings. Impacts related to the visual appearance of the Project site as perceived from the surrounding neighborhoods along McKinley Avenue and Sam Littleton Street would be less than significant.

Presently, the view of the Project site from Rosecrans Avenue consists of a fenced driveway, overgrown with weeds, adjacent to an underutilized retail center. This aspect of the Project site is only approximately 30 feet wide. This view would be replaced under the Project with a new gated entryway, which would be 60 feet wide. The visual appearance of the Project site from this perspective is minor compared to the remainder of the site and would not change substantially from the existing view. Impacts related to the visual appearance of the Project site as perceived from Rosecrans Avenue would be less than significant.

The existing minimally paved entrance to the Project site from Central Avenue would be replaced by a fully paved driveway and internal roadway system with monument signage and landscaping that would represent a substantially improved visual appearance over existing conditions. The expected visual appearance of the Project site after construction is shown in Figure 12. The Project would have a less than significant impact on visual character at this location and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The operational and design characteristics of Revised Site Plan A would be similar to Site Plan A and Site Plan B. The visual characteristics of the area surround the Project site are the same as for Site Plan A and Site Plan B.

Construction Impacts

Revised Site Plan A Project construction activities would introduce new structures and a variety of equipment onto the Project site, potentially including scaffolding, cranes, and support vehicles. Implementation of Mitigation Measures AE-1 and AE-2, which require screening of the construction area, would reduce impacts to visual character related to construction activities. Further, the impact due to construction itself would be temporary. Visual impacts during construction would be less than significant with mitigation.

Operational Impacts

The operational and design characteristics of Revised Site Plan A would be similar to Site Plan A and Site Plan B. Impacts related to the visual appearance of the Project site as perceived from the surrounding areas would be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The operational and design characteristics of Revised Site Plan B would be similar to Site Plan A and Site Plan B. The visual characteristics of the area surround the Project site are the same as for Site Plan A and Site Plan B.

Construction Impacts

Revised Site Plan B Project construction activities would introduce new structures and a variety of equipment onto the Project site, potentially including scaffolding, cranes, and support vehicles. Implementation of Mitigation Measures AE-1 and AE-2, which require screening of the construction area, would reduce impacts to visual character related to construction activities. Further, the impact due to construction itself would be temporary. Visual impacts during construction would be less than significant with mitigation.

Operational Impacts

The operational and design characteristics of Revised Site Plan B would be similar to Site Plan A and Site Plan B. Impacts related to the visual appearance of the Project site as perceived from the surrounding areas would be less than significant. No mitigation measures are required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Shade/Shadow

Less-Than-Significant Impact. The analysis of the Project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas. The maximum shadows from the Project's proposed 52-foot high buildings would extend 156 feet to the north of the building(s) during the winter solstice.[6] As the Project buildings would be set back at least 250 feet from the northern property line under Site Plan A, and at least 165 feet from the residential uses north of Sam Littleton Street under Site Plan B, shadows created by the Project buildings would not extend beyond the roadway of Sam Littleton Street and would not fall on sensitive receptors surrounding the Project site. Shadows from Building A-2/B-1 would be cast to the northwest during the morning of the winter solstice and would move to the north and northeast through the day. These shadows would not be cast directly to the east onto the senior housing facility except at the end of the day, and would not significantly affect this use. Accordingly, the Project would not result in a significant shade/shadow impact and no mitigation measures are required.

[6] *City of Los Angeles CEQA Thresholds Guide, 2006. The winter solstice represents the longest shadows cast from a building during the year.*

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The operational and design characteristics of Revised Site Plan A would be similar to Site Plan A and Site Plan B. The characteristics of the areas around the Project site are the same as for Site Plan A and Site Plan B. The Project would not result in a significant shade/shadow impact and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The operational and design characteristics of Revised Site Plan B would be similar to Site Plan A and Site Plan B. The characteristics of the areas around the Project site are the same as for Site Plan A and Site Plan B. The Project would not result in a significant shade/shadow impact and no mitigation measures are required.

Glare

Less-Than-Significant With Mitigation Incorporated. Project development would result in the use of various non-reflective materials designed to minimize the transmission of glare from the new development. Residential uses, which are located around the Project site, will not have a view of the new development, which will be buffered by landscaping along the Project site boundaries as described above. Roadways adjacent to the Project site include Central Avenue, Sam Littleton Street, McKinley Avenue, and Rosecrans Avenue. Motorists and pedestrians on these roadways could potentially be impacted by light (e.g., sunlight, vehicle headlights) reflecting off the windows of on-site structures. In general, the proposed structures would be constructed of materials with low reflectivity, including concrete, painted metal, cinder block, and stucco. Further, as required by Mitigation Measure AE-3, windows within the new development would be required to include low-reflectivity window materials that would reduce light reflecting off the window surfaces. Light reflecting from trucks operating on the Project site would not be expected to extend off-site because this glare would occur below the level of the fencing and landscaping that would be installed along the Project site boundary. Implementation of the mitigation measure below, which prohibits expansive areas of highly reflective material, would help to reduce impacts related to glare to less than significant. Therefore, the Project would result in a less than significant impact with regard to glare with implementation of the mitigation measure.

Less-Than-Significant With Mitigation Incorporated. The operational and design characteristics of the Revised Site Plan A Project would be similar to Site Plan A and Site Plan B. Implementation of Mitigation Measure AE-3, which prohibits expansive areas of highly reflective material, would help to reduce impacts related to glare to less than significant. Impacts would be less than significant with implementation of the mitigation measure.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. The operational and design characteristics of the Revised Site Plan B Project would be similar to Site Plan A and Site Plan B. Implementation of Mitigation Measure AE-3, which prohibits expansive areas of highly reflective material, would help to reduce impacts related to glare to less than significant. Impacts would be less than significant with implementation of the mitigation measure.

MM AE-3. *The use of highly reflective materials, such as mirrored glass, shall be prohibited. Non-reflective building materials shall be used to the maximum extent possible to reduce potential glare impacts. Building materials shall be identified on the Architectural Plans submitted for plan check for the Planning Division's review and approval.*

Artificial Light

Less-Than-Significant With Mitigation Incorporated. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Currently, the Project site is characterized by low levels of artificial light, as the site is not active at night and previous buildings have been removed. The areas surrounding the site to the north and west are also characterized by limited nighttime lighting, with existing light sources limited to street lights and vehicle lights. The areas to the east and south of the Project site are characterized by higher levels of existing lighting from street lights and other uses located along Central and Rosecrans Avenues, including the shopping centers and other commercial uses located to the south of the Project site at the intersection of Central and Rosecrans. Artificial light sources associated with these uses in the vicinity of the Project site include street lights, tenant identification signs, vehicle headlights, building identification signage, and light emanating from the interiors of buildings. Generally, these sources provide ambient lighting levels that are typical of an urban area. The Project would increase the number of light sources and therefore the ambient lighting levels on the Project site. Potential Project on-site light sources would include nighttime security and parking lot lighting, signage, on-site building and loading dock lighting, and minimal amounts of light radiating from the interior of on-site buildings. In addition, light from the headlights of vehicles operating within the Project site would increase lighting levels on the site, as well as on the surrounding roadways.

As discussed above, uses such as residences, are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The residences to the west and north of the Project site will experience the increased lighting levels on the Project site from parking lot and building lighting as an increase in the ambient glow of the area, as these lighting sources would be shielded and focused downward so as not to shine directly onto adjacent properties, Headlights from vehicles operating on the site would also be not directly perceptible from these locations since they would be located at ground levels and would be screened from outside view by the walls and landscaping provided along the north and west edges of the Project site. Vehicles approaching the Project's McKinley Avenue gate from the south would contribute to the ambient glow of the area but would not directly shine into sensitive receptors when travelling north on McKinley Avenue and into the Project site. Headlights from vehicles exiting the Project site through this gate would potentially shine into residences located on the west side of McKinley and on ~~139th~~ 138th Street, which would constitute a potentially significant impact. Implementation of Mitigation Measure AE-6 below would reduce this impact to less than significant.

The senior housing facility located to the east of the Project site would perceive the increased lighting of the Project site as an increase in the ambient light level of the area as new on site lighting sources would be shielded and directed downward and would not directly shine into the upper level, north facing units of the senior housing facility. Similarly, headlights from vehicles operating on the Project site would be directed at ground level and would not shine directly into the senior housing facility. Headlights from vehicles on the Project site would be screened from shining into ground level, north-facing units within the senior housing facility by walls, fencing and landscaping that would be provided on the edge of the Project site.

Residences to the east and south of the Project site across Central Avenue and Rosecrans Avenue, respectively, experience relatively high ambient nighttime light levels from adjacent lighting sources. Thus, any increase in nighttime light levels resulting from the Project would be expected to be contained within the existing ambient glow that is presently experienced at these locations.. Further, implementation of the mitigation measures below, which would require that lighting be designed to minimize off-site migration, would further reduce impacts related to artificial lighting. Thus, with implementation of the mitigation measures below, the Project would result in a less than significant impact with regard to artificial light impacts.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. The operational and design characteristics of the Revised Site Plan A Project would be similar to Site Plan A and Site Plan B. The removal of the 70,000 square foot Building A-2 and replacement with a container storage lot under this Revised Site Plan would remove the building lighting on this site and replace this lighting with parking lot lights that would be shielded and focused downward, along with reduced vehicular activity as compared to the more continuous operation that would occur at this site under Site Plan A. This would reduce the contribution of new lighting from this part of the Project Site to the ambient glow of the area, as compared to the Site Plan A Project, and would reduce the less than significant lighting impact at some receptor locations, notably the senior housing facility located to the east of the boundary of the Building A-2 site. With implementation of the Mitigation Measures AE-4 through AE-6, the Project would result in a less than significant impact with regard to artificial light impacts.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. The operational and design characteristics of the Revised Site Plan B Project would be similar to Site Plan A and Site Plan B. The removal of the 70,000 square foot Building B-3 and replacement with a container storage lot under this Revised Site Plan would remove the building lighting on this site and replace this lighting with parking lot lights that would be shielded and focused downward, along with reduced vehicular activity as compared to the more continuous operation that would occur at this site under Site Plan B. This would reduce the contribution of new lighting from this part of the Project Site to the ambient glow of the area, as compared to the Site Plan B Project, and would reduce the less than significant lighting impact at some receptor locations, notably the senior housing facility located to the east of the boundary of the Building B-3 site. With implementation of the Mitigation Measures AE-4 through AE-6, the Project would result in a less than significant impact with regard to artificial light impacts.

MM AE-4. *All exterior lighting shall be shielded downward and away from adjoining properties and the public right-of-way. A lighting plan shall be submitted for approval by the City of Compton. This lighting plan shall specify lighting type and placement to ensure lighting does not spill over onto adjoining properties.*

MM AE-5. *A construction lighting plan shall be submitted before the City issues building permits. Construction lighting shall be shielded downward and not shine onto adjoining properties and the public right-of-way.*

Based on review of Mitigation Measure AE-6, it was determined that the measure originally proposed in the Draft IS/MND could potentially pose a traffic safety hazard and would be infeasible. Mitigation Measure AE-6 has been revised to realign the Project driveway on McKinley Avenue to align with 138th Street such that headlights from vehicles existing the Project Site would primarily shine down 138th Street and would affect nearby residences only fleetingly, similar to any vehicle travelling down 138th Street or McKinley Avenue. Accordingly, the revision to the mitigation measure would replace the measure with a measure that is equivalent or more effective than the previous measure, and does not have any potentially significant effect on the environment. Accordingly, this replacement would not require recirculation of the IS/MND in accordance with CEQA Guidelines Section 15073.5(c)(1).

MM AE-6. ~~*Vehicles exiting the Project site through the McKinley Avenue gate during nighttime hours shall be instructed via signage within the Project to extinguish headlights until located fully southbound on McKinley Avenue, so as to avoid shining headlights directly into residences located west of McKinley Avenue on 139th Street.*~~*The project driveway on McKinley Avenue shall be aligned with 138th Street, and this driveway and the approach within the Project site shall be striped such that existing vehicles*

will align with 138th Street, and their headlights shall shine directly down 138th Street until those vehicles have exited the Project site. The design of this driveway and the intersection with McKinley Avenue shall be subject to the review and approval of the City of Compton and Los Angeles County Department of Public Works.

2. AGRICULTURE RESOURCES

a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?

No Impact. The Project site is has been associated with the Atkinson Brickyard since 1939. The Project site is located in an urbanized area of the City of Compton and is zoned for Heavy Manufacturing (MH) use. When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.).

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation, Division of Land Resources Protection; the Project site is located in an area designated as Urban and Built Up Land.[7] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Thus, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Impacts related to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be the same as the original projects. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Impacts related to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be the same as the original projects. No impact would occur and no mitigation measures are required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is not enrolled under the Williamson Act.[8] The Heavy Manufacturing (MH) zoning designation does not permit agricultural uses. Thus, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. No impact would occur and no mitigation measures are required.

---

7 *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, GIS data, website: www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm, January 2009. Accessed July 1, 2014.*

8 *California Department of Conservation, Division of Land Resource Protection, Williamson Act Protection, website: http://www.consrv.ca.gov/DLRP/lca/Pages/index.aspx. Accessed August 21, 2014.*

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Impacts related to zoning for agricultural use, or Williamson Act Contracts would be the same as the original projects. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Impacts related to zoning for agricultural use, or Williamson Act Contracts would be the same as the original projects. No impact would occur and no mitigation measures are required.

c) Involve other changes in the existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project site is located within the jurisdiction of the City of Compton and is, therefore, subject to the applicable land use and zoning requirements in Chapter XXX of the Compton Municipal Code, Zoning ("the Zoning Code"). The Zoning Code includes development standards for the various zoning districts in the City of Compton. The Project site is currently zoned MH (Heavy Manufacturing). The Project site is not zoned as forest land or timberland, and there is no Timberland Production at the Project site. Therefore no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not zoned as forest land or timberland, and there is no Timberland Production at the Project site. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not zoned as forest land or timberland, and there is no Timberland Production at the Project site. No impact would occur and no mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land exists on or in the vicinity of the Project site. Therefore no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. No forest land exists on or in the vicinity of the Project site. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. No forest land exists on or in the vicinity of the Project site. No impact would occur and no mitigation measures are required.

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

No Impact. Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project site is not classified in any "Farmland" category designated by the State of California. Therefore, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses and the Project site is not classified in any "Farmland" category designated by the State of California. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses and the Project site is not classified in any "Farmland" category designated by the State of California. No impact would occur and no mitigation measures are required.

3. AIR QUALITY

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less-Than-Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would in some way represent a substantial hindrance to employing the policies, or obtaining the goals, of that plan.

The project site is located within the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) is the air quality management agency for SCAB. SCAQMD is prescribed by law to meet the air quality standards established for the SCAB by the federal and State Clean Air Acts and amendments. SCAQMD is responsible for regulating and reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. SCAQMD has responded to these requirements by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with applicable standards, to accommodate growth, to reduce the levels of pollutants in the SCAB, to meet federal and State air quality standards for nonattainment areas, and to minimize the fiscal impact that pollution control measures have on the local economy. The SCAB is currently in nonattainment for ozone, NO_2, PM_{10} and $PM_{2.5}$. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the SCAB.

The future air quality levels projected in the 2012 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in

accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 4, 2012. The 2012 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

For general development projects, the SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections utilized in the formulation of the 2012 AQMP. As such, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds. However, exceeding the AQMP population projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered to be a significant impact. The Project would comply with all SCAQMD rules and regulations that are in effect at the time of development and that are applicable to the Project; the Project applicant is not requesting any exemptions from the currently adopted or proposed rules.

As discussed in Question 13(a) herein, Project impacts associated with SCAG's applicable growth projections would be less than significant. In addition, as discussed in detail in Questions 3(b) through 3(d) herein, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Thus, the Project would not have the potential to conflict with nor impair implementation of the AQMP, and this impact would be less than significant. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The regulatory environment for the Revised Site Plan A Project related to air quality would be the same as for Site Plan A and Site Plan B. Project impacts associated with SCAG's applicable growth projections would be less than significant. In addition, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Revised Site Plan A Project would not have the potential to conflict with nor impair implementation of the AQMP, and this impact would be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The regulatory environment for the Revised Site Plan B Project related to air quality would be the same as for Site Plan A and Site Plan B. Project impacts associated with SCAG's applicable growth projections would be less than significant. In addition, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Revised Site Plan B Project would not have the potential to conflict with nor impair implementation of the AQMP, and this impact would be less than significant. No mitigation measures are required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Less-Than-Significant With Mitigation Incorporated. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if

project-related emissions would substantially contribute to an existing or projected air quality violation. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table 1, SCAQMD Thresholds of Significance, be considered significant. The City of Compton utilizes these thresholds for the evaluation of construction and operational air quality impacts.

Table 1
SCAQMD Thresholds of Significance

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)[1]	75	55
Nitrogen Oxides (NO_x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.
[1] Also referred to as Reactive Organic Compounds (ROG)
Source: South Coast Air Quality Management District.

Regional Construction Emissions

When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.). Designated dirt roadways were being used by trucks operating on-site. At the time, the Project site contained four structures totaling approximately 120,000 square feet and three above ground storage tanks. The above ground storage tanks were removed in June 2014. The buildings located on the Project site at the time the environmental review process for the Project commenced were removed by the Project applicant under a separate project (pursuant to a validly issued, ministerial demolition permit) to voluntarily abate imminent health risks associated with the existing buildings. Given the activities that previously took place during the operation of the brickyard, these buildings were characterized by high levels of hazardous asbestos. Under the regulatory cognizance of the SCAQMD, the buildings were abated and demolished. As a separate ministerial permit process, the demolition activity and removal of debris were outside the scope of the Project. However, analysis of the demolition and removal activities is provided herein for informational purposes. For the purposes of disclosing the air quality emissions associated with the demolition and removal of the four buildings that totaled 120,000 square feet, emissions were modeled for demolition and associated debris hauling occurring over a one-month period during 2014. The estimated emissions associated with this demolition activity and the assumptions used to calculate the estimated emissions are provided in Table 2. As shown, emissions associated with this demolition activity were below the applicable SCAQMD thresholds.

Table 2
Estimated Peak Daily Construction Emissions From Non-Project Related Demolition Activity

Emissions Source	Emissions in Pounds per Day[1]					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase						
Fugitive Dust	--	--	--	--	5.14	0.78
Off-Road Diesel Equipment	4.60	49.54	36.29	0.04	2.53	2.36
Hauling	0.58	8.86	6.37	0.02	0.57	0.26
Worker Trips	0.09	0.11	1.20	0.02	0.17	0.05
Total Emissions	***5.27***	***58.51***	***43.86***	***0.08***	***8.41***	***3.45***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2014
Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
[1] Definitions of Criteria Pollutants are provided in Table 1.
Calculation sheets are provided in Appendix A to this Draft IS/MND.

In addition to the demolition activities which took place prior to the initiation any of the Project's construction activities, other interim activities have occurred on-site, consisting of concrete and asphalt crushing activities that would have been undertaken in accordance with existing regulations regardless of whether the Project is ultimately approved and developed. Under these activities, all associated debris would remain on-site and would be leveled across the existing grade. It is anticipated these interim activities would share similar worst-case daily construction equipment mixes as the demolition activities described above, with no associated off-site hauling, and thus, would have lower daily emissions than the demolition activity shown in Table 2. Accordingly, this activity would not have the potential to exceed applicable SCAQMD thresholds of significance.

With respect to the activities associated with the Project, the Project considers the construction of two possible development scenarios identified in the Project Description as Site Plan A and Site Plan B. Site Plan A consists of a 1,430,000-square foot light industrial warehouse/distribution building on the main parcel, with truck loading doors running north/south and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side, for a total of 1.5 million square feet of light industrial/warehouse uses. Site Plan B consists of a 525,400-square foot light industrial warehouse/distribution building with truck loading doors running east/west on the northwest side of the main parcel, a 481,600-square foot light industrial building with truck loading doors running east/west on the northeast side of the main parcel, and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side, for a total of 1,077,000 sf of light industrial/warehouse uses.

For purposes of analyzing construction impacts associated with air quality, this analysis focuses on the larger and more impactful construction scenario of Site Plan A. Site Plan B would result in less total construction activity and would not exceed the worst-case daily assumptions identified herein for Site Plan A. This analysis assumes a construction schedule of approximately 24 months. This assumption is conservative and yields the maximum daily construction emissions. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) grading/site preparation/foundations, (2) building construction, (3) architectural coatings, and (4) paving and striping of surface parking and access roads.

These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and foundation

preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NOx emissions. The application of architectural coatings and paving off-gassing would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. Each construction phase is described in more detail below.

Grading, Site Preparation and Foundations Phase

The grading/site preparation/foundation phase for the Proposed Project is anticipated to occur for approximately three months and would involve the cut and fill of land to ensure the proper base and slope for the buildings and parking lot foundations. This analysis assumes that current reverse-mining operations will be completed prior to the commencement of site improvements related to Project construction. The analysis reflects the import/export of up to 30,000 cubic yards of soil in conjunction with the grading of the site, which is comparable to the activity associated with the reverse mining operation. This analysis assumes daily grading, site preparation and foundation activities would require the following equipment: one grader, two excavators, two scrapers, one rubber tired dozer, and two tractors/loaders/backhoes.

Building Construction Phase

The building construction phase consists of the physical construction of the proposed structures and is expected to occur for approximately 16 months. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, three forklifts, one generator set, three tractors/loaders/backhoes, and one welder.

Architectural Coating Phase

Upon completion of the structures, architectural coating and finishing would occur for approximately 4 months. This phase would require the use of one air compressor. This analysis assumes the use of super compliant architectural coatings as defined by SCAQMD (VOC standard of less than 10 g/L), as required in Mitigation Measure MM AQ-1. As shown in the calculations below, the result was daily ROG emissions from architectural coatings would total approximately 16 ppd. Thus, assuming an 88 day architectural coating phase and a VOC standard of less than 10 g/L, an additional 57.93 ppd of ROG emissions could occur before exceeding the daily 75 ppd threshold. Accordingly, with implementation of Mitigation Measure MM AQ-1, the architectural coatings phase could be reduced without exceeding the SCAQMD threshold.

Paving & Striping Phase

Paving and striping of surface parking areas and access roads would occur for approximately one month and would require the use of two pavers, two rollers, and 2 pieces of paving equipment.

The analysis of Project-related daily construction emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod 2013.2.2) recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table 3, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages

before vehicles exit the Project Site, maintaining effective cover over exposed areas and suspending grading operations during periods of high winds.

As shown in Table 3, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts would be less than significant.

Regional Operational Emissions

Project Site (2014)

When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.). Designated dirt roadways were in use by trucks operating on-site. At the time the environmental analysis for the Project commenced, the Project site contained four structures totaling approximately 120,000 square feet and three above ground storage tanks. These uses have been identified in the Project's Traffic Impact Analysis Report (Traffic Report) as General Light Industrial (ITE 110). The traffic associated with these on-site uses was identified through actual counts of the number and types of vehicles entering and exiting the Project Site during both the AM and PM peak traffic periods. As detailed in the Project's Traffic Report, which is provided in Appendix K to this IS/MND, the uses on the Project Site, not including demolition activities (2014) generated approximately 488 unadjusted[9] daily trips. Of this total, approximately 174 (35.7%) were identified as passenger cars, 162 (33.2%) were identified as 3-axle trucks (MHD), and 152 (31.1%) were identified as 4-axle trucks (HHD). Accordingly, air quality emissions associated with these prior uses were calculated with SCAQMD-recommended CalEEMod, which is a modeling program used to estimate pollutant and greenhouse gas emissions associated with construction and operations of a variety of land use projects. The estimated air quality emissions were based on the measured vehicle operations in accordance with the above described fleet mix. These results are presented in Table 4, Project Site (2014) Daily Operational Emissions.

[9] *The Project's Traffic Report presents the total Project vehicle trips in terms of Passenger Car Equivalents (PCEs) in an effort to recognize and acknowledge the effects of heavy vehicles (trucks) at the study area intersections. Notwithstanding, for purposes of the air quality analysis, the PCE trips were not used. Rather, to more accurately estimate and model vehicular-source emissions, the actual "unadjusted" number of vehicles by vehicle classification (e.g., passenger cars, light, medium, and heavy trucks) were used in this analysis.*

Table 3
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Grading/Site Preparation/Foundation Phase						
Fugitive Dust	--	--	--	--	4.13	1.48
Off-Road Diesel Equipment	6.78	79.05	50.84	0.06	3.80	3.50
Worker Trips	0.13	0.14	1.44	0.01	0.23	0.06
Total Emissions	***6.91***	***79.19***	***52.28***	***0.07***	***8.16***	***5.04***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	3.66	30.03	18.74	0.03	2.12	1.99
Building Construction Vendor Trips	3.37	32.25	42.42	0.07	2.52	1.05
Building Construction Worker Trips	4.19	5.60	58.72	0.11	9.20	2.50
Total Emissions	***11.22***	***67.88***	***119.88***	***0.21***	***13.84***	***5.54***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Architectural Coatings Phase						
Architectural Coatings	15.94	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.37	2.37	1.88	0.01	0.20	0.18
Architectural Coatings Worker Trips	0.76	1.01	10.62	0.02	1.84	0.50
Total Emissions	***17.07***	***3.38***	***12.50***	***0.03***	***2.04***	***0.70***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Paving Phase						
Paving Off-Road Diesel Equipment	2.09	22.39	14.82	0.02	1.26	1.16
Paving (Off-gas)	1.18	--	--	--	--	--
Paving Worker Trips	0.07	0.09	0.98	0.01	0.17	0.05
Total Emissions	***3.34***	***22.48***	***15.80***	***0.03***	***1.43***	***1.21***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2014
Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
Calculation sheets are provided in Appendix A to this Draft IS/MND.

Table 4
Project Site (2014) Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	3.14	<0.01	0.01	0.00	<0.01	<0.01
Energy Demand	0.07	0.61	0.51	<0.01	0.05	0.05
Mobile (Motor Vehicles)	5.01	56.86	53.51	0.13	6.23	2.48
Total Existing Emissions	**8.22**	**57.47**	**54.04**	**0.14**	**6.27**	**2.53**
Wintertime (Non-Smog Season) Emissions						
Area Sources	3.14	<0.01	0.01	0.00	<0.01	<0.01
Energy Demand	0.07	0.61	0.51	<0.01	0.05	0.05
Mobile (Motor Vehicles)	5.41	58.72	60.05	0.13	6.23	2.49
Total Existing Emissions	**8.61**	**59.32**	**60.58**	**0.14**	**6.28**	**2.54**

Source: Pomeroy Environmental Services, 2014
Calculation data provided in Appendix A to this IS/MND. Column totals may not add due to rounding from the model results.

With Project Operational Regional Emissions

Site Plan A

Site Plan A consists of a 1,430,000-square foot light industrial warehouse/distribution building on the main parcel, with truck loading doors running north/south and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side, a total of 1.5 million square feet of light industrial/warehouse uses. As the future tenants of the Project have not been identified at this time, this analysis assumes that 10% of the 1.5 million square foot light industrial/warehouse use would be refrigerated and 90% would be unrefrigerated. No rail access is proposed. As detailed in the Project's Traffic Report, Site Plan A would generate approximately 2,520 unadjusted daily trips. Of this total, approximately 2,005 (79.57%) are identified as passenger cars, 87 (3.46%) are identified as 2-axle trucks (LHD), 116 (4.64%) are identified as 3-axle trucks (MHD), and 312 (12.33%) are identified as 4-axle trucks (HHD). Accordingly, Site Plan A air quality emissions have been calculated with CalEEMod based on the operation of 1,350,000 square feet of unrefrigerated warehouse uses, 150,000 square feet of refrigerated warehouse uses, and mobile source (motor vehicle) emissions in accordance with the above described fleet mix. These results are presented in Table 5, Site Plan A Daily Operational Emissions. As shown, the net operational emissions generated by Site Plan A would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational air quality emissions from Site Plan A would be less than significant.

Site Plan B

Site Plan B consists of a 525,400-square foot light industrial warehouse/distribution building with truck loading doors running east/west on the northwest side of the main parcel, a 481,600-square foot light industrial building with truck loading doors running east/west on the northeast side of the main parcel, and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side. Site Plan B totals 1,077,000 square feet of light industrial/warehouse uses. As the future tenants of the Project have not been identified at this time, this analysis assumes that 10% of the 1,077,000 sf light industrial/warehouse use would be refrigerated and 90% would be unrefrigerated. No rail access is proposed. As detailed in the Project's Traffic Report, Site Plan B would generate approximately 1,810 unadjusted daily trips. Of this total, approximately 1,441 (79.57%) are identified as passenger cars, 63 (3.46%) are

identified as 2-axle trucks (LHD), 84 (4.64%) are identified as 3-axle trucks (MHD), and 222 (12.33%) are identified as 4-axle trucks (HHD). Accordingly, Site Plan B air quality emissions have been calculated with CalEEMod based on the operation of 969,300 square feet of unrefrigerated warehouse uses, 107,700 square feet of refrigerated warehouse uses, and mobile source (motor vehicle) emissions in accordance with the above described fleet mix. These results are presented in Table 6, Site Plan B Daily Operational Emissions. As shown, the net operational emissions generated by Site Plan B would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational air quality emissions from Site Plan B would be less than significant.

MM AQ-1. The project shall utilize paints and solvents with a VOC standard of less than 10 g/L, as identified by the SCAQMD, to the extent required to keep VOC emissions below the SCAQMD threshold of 75 pounds per day. These materials may be used in conjunction with other measures, including adjustments to construction schedules, to achieve this performance standard.

Table 5
Site Plan A Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	45.73	<0.01	0.27	<0.01	<0.01	<0.01
Energy Demand	0.04	0.37	0.31	<0.01	0.03	0.03
Mobile (Motor Vehicles)	9.50	66.54	126.55	0.39	24.24	7.18
Total Site Plan A Emissions	***55.27***	***66.92***	***127.13***	***0.39***	***24.27***	***7.21***
Less Project Site (2014) Emissions	8.22	57.47	54.04	0.14	6.27	2.53
Net Increase Site Plan A Emissions	**47.05**	**9.45**	**73.09**	**0.25**	**18.00**	**4.68**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	45.73	<0.01	0.27	<0.01	<0.01	<0.01
Energy Demand	0.04	0.37	0.31	<0.01	0.03	0.03
Mobile (Motor Vehicles)	9.95	69.05	133.90	0.38	24.25	7.18
Total Site Plan A Emissions	***55.72***	***69.43***	***134.48***	***0.38***	***24.28***	***7.21***
Less Project Site (2014) Emissions	8.61	59.32	60.58	0.14	6.28	2.54
Net Increase Site Plan A Emissions	**47.11**	**10.11**	**73.90**	**0.24**	**18.00**	**4.67**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2014.
Calculation data provided in Appendix A. Column totals may not add due to rounding from the model results.

Table 6
Site Plan B Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	34.09	<0.01	0.21	<0.01	<0.01	<0.01
Energy Demand	0.03	0.27	0.23	<0.01	0.02	0.02
Mobile (Motor Vehicles)	6.82	47.78	90.86	0.28	17.41	5.15
Total Site Plan B Emissions	***40.94***	***48.05***	***91.30***	***0.28***	***17.43***	***5.18***
Less Project Site (2014) Emissions	8.22	57.47	54.04	0.14	6.27	2.53
Net Increase Site Plan B Emissions	**32.72**	**(9.42)**	**37.26**	**0.14**	**11.16**	**2.65**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	34.09	<0.01	0.21	<0.01	<0.01	<0.01
Energy Demand	0.03	0.27	0.23	<0.01	0.02	0.02
Mobile (Motor Vehicles)	7.14	49.58	96.14	0.27	17.41	5.16
Total Site Plan B Emissions	***41.26***	***49.85***	***96.58***	***0.27***	***17.43***	***5.18***
Less Project Site (2014) Emissions	8.61	59.32	60.58	0.14	6.28	2.54
Net Increase Site Plan B Emissions	**32.65**	**(9.47)**	**36.00**	**0.13**	**11.15**	**2.64**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2014.
Calculation data provided in Appendix A. Column totals may not add due to rounding from the model results.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The regulatory environment and thresholds of significance for the Revised Site Plan A Project related to air quality would be the same as for Site Plan A and Site Plan B.

Regional Construction Emissions

Emissions associated with demolition activity on the Project site would be the same as for the Site Plan A and Site Plan B Projects, below the applicable SCAQMD thresholds. Construction emissions associated with the Revised Site Plan A Project were calculated with CalEEMod using the same assumptions as for the Site Plan A and Site Plan B Projects, including implementation of Mitigation Measure AQ-1, except that the amount of development was reflective of the smaller project that would be constructed under Revised Site Plan A. The results of these calculations are shown in Table 3a. As shown, construction-related daily emissions associated with the Revised Site Plan A Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts would be less than significant with mitigation.

Table 3a
Estimated Peak Daily Construction Emissions – Revised Site Plan A Project

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Grading/Site Preparation/Foundation Phase						
Fugitive Dust	--	--	--	--	4.13	1.48
Off-Road Diesel Equipment	6.78	79.05	50.84	0.06	3.80	3.50
Worker Trips	0.13	0.14	1.44	0.01	0.23	0.06
Total Emissions	***6.91***	***79.19***	***52.28***	***0.07***	***8.16***	***5.04***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	3.66	30.03	18.74	0.03	2.12	1.99
Building Construction Vendor Trips	2.81	26.88	35.35	0.06	2.10	0.88
Building Construction Worker Trips	3.48	4.66	48.85	0.09	7.65	2.08
Total Emissions	***9.95***	***61.57***	***102.94***	***0.18***	***11.87***	***4.95***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Architectural Coatings Phase						
Architectural Coatings	12.30	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.37	2.37	1.88	0.01	0.20	0.18
Architectural Coatings Worker Trips	0.63	0.85	8.86	0.02	1.53	0.42
Total Emissions	***13.30***	***3.22***	***10.74***	***0.03***	***1.73***	***0.60***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Paving Phase						
Paving Off-Road Diesel Equipment	2.09	22.39	14.82	0.02	1.26	1.16
Paving (Off-gas)	1.18	--	--	--	--	--
Paving Worker Trips	0.07	0.09	0.98	0.01	0.17	0.05
Total Emissions	***3.34***	***22.48***	***15.80***	***0.03***	***1.43***	***1.21***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2015.
Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
Calculation sheets are provided in Appendix A-2 to this Draft IS/MND.

Regional Operational Emissions

Regional operational air emissions associated with Revised Site Plan A have been calculated with CalEEMod based on the operation of 1,038,600 square feet of unrefrigerated warehouse uses, 115,400 square feet of refrigerated warehouse uses, and mobile source (motor vehicle) emissions. These results are presented in Table 5a, Daily Operational Emissions – Revised Site Plan A. As shown, the operational emissions generated by Revised Site Plan A would not exceed the regional thresholds of significance set by the SCAQMD. The calculations shown in Table 5a conservatively do not include any offset for existing Project site emissions. These

estimated emissions would be less than the total emissions for the Site Plan A Project (notwithstanding credits that were taken for existing uses for the original Site Plan A Project). Impacts associated with regional operational air quality emissions would be less than significant and no mitigation measures are required.

Table 5a
Site Plan A Daily Operational Emissions – Revised Site Plan A

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	37.63	<0.01	0.24	<0.01	<0.01	<0.01
Energy Demand	0.03	0.29	0.24	<0.01	0.02	0.02
Mobile (Motor Vehicles)	7.31	51.19	97.36	0.30	18.65	5.52
Total Project Emissions	***44.97***	***51.48***	***97.84***	***0.30***	***18.67***	***5.55***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	37.63	<0.01	0.24	<0.01	<0.01	<0.01
Energy Demand	0.03	0.29	0.24	<0.01	0.02	0.02
Mobile (Motor Vehicles)	7.66	53.12	103.01	0.29	18.66	5.53
Total Project Emissions	***45.32***	***53.41***	***103.49***	***0.30***	***18.68***	***5.55***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No

Source: Pomeroy Environmental Services, 2015.
Calculation data provided in Appendix A-2. Column totals may not add due to rounding from the model results.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would have similar construction and operational characteristics of the Revised Site Plan A Project. The regulatory environment and thresholds of significance for the Revised Site Plan B Project related to air quality would be the same as for Revised Site Plan A.

Regional Construction Emissions

Emissions associated with demolition activity on the Project site would be the same as for the Site Plan A and Site Plan B Projects, below the applicable SCAQMD thresholds. Construction activity under the Revised Site Plan B Project would be similar to the Revised Site Plan A Project, as shown in Table 3a, and would be less than significant with mitigation incorporated.

Regional Operational Emissions

Operational activity, including traffic generation, under the Revised Site Plan B Project would be the same as the Revised Site Plan A Project, as shown in Table 5a, and would be less than significant. No mitigation measures are required.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less-Than-Significant Impact. Because the SCAB is currently in nonattainment for ozone, NO_2, PM_{10} and $PM_{2.5}$, related projects may likely exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution to a cumulative impact, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment.

As discussed under Checklist Question 3(b), above, the Project would not exceed any of the SCAQMD's recommended mass daily thresholds of significance for construction or operation. Also, as discussed in Checklist Question 3(d), below, localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute to a cumulatively considerable increase in emissions for the pollutants for which the SCAB is in nonattainment. Cumulative air quality impacts would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. The Revised Site Plan A Project would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The Project would not exceed any of the SCAQMD's recommended mass daily thresholds of significance for construction or operation, and localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute to a cumulatively considerable increase in emissions for the pollutants for which the SCAB is in nonattainment. Cumulative air quality impacts would be less than significant.

Revised Site Plan B

Less-Than-Significant Impact. The Revised Site Plan B Project would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The Project would not exceed any of the SCAQMD's recommended mass daily thresholds of significance for construction or operation, and localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute to a cumulatively considerable increase in emissions for the pollutants for which the SCAB is in nonattainment. Cumulative air quality impacts would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less-Than-Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because

people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptors to the Project site include single-family residences to the north (across Sam Littleton Street), single-family residences to the east (across Central Avenue), single-family residences to the west (across McKinley Avenue), and a senior housing facility to the east of the Project site. With the exception of the single-family residences to the west (across Central Avenue), all of these sensitive receptors are located within 25 meters of the Project site boundaries. The closest schools to the Project site are the Community Lutheran Church Preschool, approximately 0.18 miles west of the Project site, and Centennial High School, approximately one-quarter mile north of the Project site.

The SCAQMD has developed localized significance thresholds (LST) for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the applicable federal or State ambient air quality standard. LSTs are provided for each source receptor area (SRA) and various distances from the source of emissions. In the case of this analysis, the Project Site is located within SRA 12 – South Central LA County with sensitive receptors located within 25 meters. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. For grading and site preparation activities, the CalEEMod User's Guide (Appendix A: Calculation Details for CalEEMod) states the applicable LST should be based on the equipment list and days in grading or site preparation phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Based on the Project's construction assumptions outlined previously, a maximum of four acres would be graded daily during the grading/site preparation/foundation phase. The LSTs for a 4.0-acre site in SRA 12 with sensitive receptors located within 25 meters have conservatively been utilized to address the potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ impacts to the area surrounding the Project site during the grading, site preparation and foundation phase.[10] With respect to building construction, architectural coatings, and paving activities, the 5.0-acre LST in SRA 12 with sensitive receptors located within 25 meters have conservatively been utilized to address the potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ impacts. The application of a 5.0-acre site for building construction activities at the project site would result in more stringent LSTs because emissions under this assumption would occur in a more concentrated area and closer to the nearest sensitive receptors than in reality.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 7, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs in SRA 12. Therefore, localized air quality impacts from construction activities on sensitive receptors would be less than significant.

Localized Operational Emissions

An operational LST analysis should include on-site (stationary and mobile) sources only. However, the CalEEMod model outputs do not separate on-site and off-site emissions from

[10] *LSTs for a 4.0-acre site were calculated per SCAQMD Linear Regression Methodology. See Appendix A to this Draft IS/MND.*

mobile sources. In an effort to establish a maximum potential impact scenario, this analysis represents all on-site Project-related stationary (area) sources and 10 percent of the Project-related mobile sources. This results in an assumption that each daily on-site vehicle trip (truck and auto) would be 1.2 miles in length. Considering the Project Site is 0.44 miles long from the southern boundary of Rosecrans Avenue to the northern boundary of Sam Littleton Street, this assumption is conservative and likely overstates the on-site vehicle miles traveled on a daily basis. The 5.0-acre LST in SRA 12 with sensitive receptors located within 25 meters have conservatively been utilized to address the potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ impacts. Although the Project site has a net site area of 56.41 acres, the application of a 5.0-acre site for operational activities at the project site would result in more stringent LSTs because emissions under this assumption would occur in a more concentrated area and closer to the nearest sensitive receptors than in reality. Even with these conservative operational assumptions, Table 7, Localized On-Site Peak Daily Operational Emissions, illustrates that localized operational emissions would be less than significant for both Site Plan A and Site Plan B.

The Project would not result in potentially significant CO “hot spots” and a Project-specific carbon monoxide (CO) “hot spots” analysis is not needed to reach this conclusion. It has long been recognized that CO exceedances (“hot spots”) are caused by vehicular emissions, primarily when idling at intersections. Vehicle emissions standards have become increasingly more stringent in the last twenty years. With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Project vicinity have steadily declined. For reference, in SRA 12 (South Central LA County), 8-hour CO concentrations were 4.7 ppm in 2011, 4.0 ppm in 2012, and 3.5 ppm in 2013. In addition, the last measured concentration in SRA 12 was 6.0 ppm in SRA 12 was 2010. Based on these measured and projected concentrations, the 1-hour and 8-hour CO concentrations in SRA 12 have been in decline and are substantially below the state standards. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. Therefore, the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant. No mitigation measures are required.

Table 7
Localized On-Site Peak Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Grading, Site Preparation & Foundation Emissions [a]	**79.05**	**50.84**	**7.93**	**4.98**
SCAQMD Localized Thresholds	*86.38*	*533.77*	*10.92*	*6.00*
Significant Impact?	No	No	No	No
Building Construction Emissions	**30.03**	**18.74**	**2.12**	**1.99**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No
Architectural Coating Emissions	**2.37**	**1.88**	**0.20**	**0.18**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No
Paving Emissions	**22.39**	**14.82**	**1.26**	**1.16**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
[a] Based on the Project's construction assumptions outlined previously, the applicable LST for grading should be based on a maximum daily area of 4.0 acres. As such, the localized thresholds for grading are based on a 4.0-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 12. LST calculated per SCAQMD Linear Regression Methodology.
[b] The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.
Source: Pomeroy Environmental Services, 2014.
Calculation sheets are provided in Appendix A to this Draft IS/MND.

Table 8
Localized On-Site Peak Daily Operational Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions (Site Plan A)	**6.91**	**13.66**	**2.44**	**0.73**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*4.00*	*2.00*
Significant Impact?	No	No	No	No
On-Site Emissions (Site Plan B)	**4.97**	**9.82**	**1.75**	**0.53**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*4.00*	*2.00*
Significant Impact?	No	No	No	No

Source: Pomeroy Environmental Services, 2014.
Calculation sheets are provided in Appendix A to this Draft IS/MND.

Toxic Air Contaminants (TAC)

Construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. As the Project consists of a warehouse/light industrial center, the Project would not include industrial manufacturing processes that include stationary on-site sources generating carcinogenic or non-carcinogenic toxic air contaminants. However, the Project is expected to generate/attract mobile sources (diesel trucks) that emit diesel particulate matter (DPM) in proximity to existing sensitive receptors in the Project Site vicinity. Accordingly,

a detailed Mobile Source (Diesel Truck) Health Risk Assessment (HRA) was prepared for the Project.[11] The following is a summary of the result from the HRA.

The Project (under worst-case Site Plan A) would generate 515 daily truck trips. Of this total, 87 (16.9%) are identified as 2-axle trucks (LHD), 116 (22.5%) are identified as 3-axle trucks (MHD), and 312 (60.6%) are identified as 4-axle trucks (HHD). As such, average weighted emission factors were calculated to reflect the Project's fleet mix for each necessary speed: 0 mph (idling), 5 mph (on-site travel speeds), and 25 mph (off-site travel speeds). Modeled emission rates were calculated for on-site and off-site travel sources by applying the weighted emission factors (grams/mile) to the total number of trips per segment, and the trip length per segment in miles. In addition, on-site vehicle idling emissions were calculated by applying the weighted idle emission factor (grams/idle-hr) to the number of trucks idling per source location over the total idle time (15 minutes). See Table 1, Table 2 and Figure 1 in the HRA (Appendix B to this Draft IS/MND) for details.

The American Meteorological Society (AMS)/United States Environmental Protection Agency (EPA) Regulatory Model (AERMOD) was utilized to quantify the concentrations of DPM at the receptors on and near the Project Site. AERMOD is steady-state plume modeling system specially designed to support the EPA's regulatory modeling programs. AERMOD allows the user to conduct site-specific modeling with the use of various inputs including source types, receptor locations, terrain data, meteorological conditions, and more.

As described in greater detail in the Project HRA, OEHHA recommends the 70-year exposure duration (ED) be used for determining residential cancer risks. Lifetime or 70-year exposure is the historical benchmark for comparing impacts on receptors and for evaluating the effectiveness of air pollution control measures. Although it is not likely that most people will reside at a single residence for 70 years, it is common that people will spend their entire lives in a major urban area. While residing in urban areas it is very possible to be exposed to emissions at the next residence. In order to help ensure that people do not accumulate an excess unacceptable cancer risk from cumulative exposure, OEHHA recommends using the 70-year exposure duration for risk management decisions. These 70-year assumptions were applied for the residential uses that surround the Project Site. Because there is not an existing school located within a quarter mile of the Project Site, a school child exposure assessment has not been included. However, a 9-year child exposure assessment has been conducted for children living in the residences in proximity to the Project Site per OEHHA guidance. In addition to these residential exposure assessments, a worker's 40-year exposure duration has also been included to disclose potential health risks to future Project on-site workers and existing off-site workers in the Project vicinity.

The results of the HRA confirm the Project's increase in truck traffic would expose residents, visitors, and on-site and off-site employees to increased DPM concentrations and associated health risks. However, as shown in Table 9, Project Health Risk Summary, health risks attributable to DPM generated by Project truck traffic would not exceed the SCAQMD threshold of ten (10) persons per million as the maximum acceptable incremental cancer risk, and would also not exceed the non-carcinogenic 1.0 health hazard index. As such, health risk impacts with respect to DPM generated by Project truck traffic would be less than significant. The results presented in Table 9 conservatively do not include any offset for the health risks associated with existing uses.

[11] *Mobile Source (Diesel Truck) Health Risk Assessment for the Proposed Brickyard Commerce Center, prepared by Pomeroy Environmental Services (PES), draft dated July 2014. See Appendix B to this Draft IS/MND.*

Table 9
Project Health Risk Summary

Receptor	Maximum Incremental Carcinogenic Risk (Persons Per One Million)	Noncarcinogenic Health Hazard Quotient
Residential 70-Year Exposure		
1. Central Avenue Residences	9.16	0.00575
2. Sam Littleton Residences	8.25	0.00518
3. McKinley Avenue Residences	8.38	0.00526
4. Rosecrans Avenue Residences	2.50	0.00157
5. Senior Housing	4.55	0.00285
Residential Child 9-Year Exposure		
1.Worst-Case Residential Child	1.76	0.00575
Worker 40-Year Exposure		
1. Worst-Case Worker	3.96	0.0126
Threshold	10.0	1.0
Significant Impact?	No	No

Source: Pomeroy Environmental Services, 2014.
See Appendix B to this IS/MND for a detailed breakdown of these calculations.

While it is noted that incremental carcinogenic risks approach the level of significance for the Central Avenue residences, it is important to understand that these calculations are conservative and represent the worst-case impact scenario. For example, the previous operations of the Project Site have included several heavy industrial land uses utilizing on-site diesel powered equipment and on- and off-site diesel trucks that contribute to elevated ambient health risks in the Project Site vicinity. Specifically, as detailed in the Project's Traffic Report, the Project Site (2014) operations generate approximately 314 daily truck trips. Of this total, approximately 162 are identified as 3-axle trucks (MHD) and 152 are identified as 4-axle trucks (MHD). At present, these trucks all gain access to the Project Site along Central Avenue. These truck trips were not credited against the Project's proposed truck trips and the calculations included in the HRA conservatively assumed all Project truck trips would be "new" to the vicinity of the Project Site. However, if DPM emissions associated with Project Site (2014) truck trips are considered in the risk estimate for Central Avenue residences, cancer risks attributable to the Project would be reduced by approximately 30% to 6.41 per one million.

Revised Site Plan A

Less-Than-Significant Impact. The Revised Site Plan A Project would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. Localized emissions were calculated using the same assumptions as for the Site Plan A Project, except for the size of the development.

Localized Construction Emissions

As shown in Table 7a, Localized On-Site Peak Daily Construction Emissions – Revised Site A Project, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs in SRA 12. Therefore, localized air quality impacts from construction activities on sensitive receptors would be less than significant.

Localized Operational Emissions

Table 8a, Localized On-Site Peak Daily Operational Emissions - Revised Site Plan A, illustrates that localized operational emissions would be less than significant for the Revised Site Plan A Project. The Revised Site Plan A Project would not have the potential to cause or contribute to

an exceedance of the California or federal CO standards. Impacts with respect to localized CO concentrations would be less than significant. No mitigation measures are required.

Table 7a
Localized On-Site Peak Daily Construction Emissions – Revised Site Plan A Project

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Grading, Site Preparation & Foundation Emissions [a]	**79.05**	**50.84**	**7.93**	**4.98**
SCAQMD Localized Thresholds	*86.38*	*533.77*	*10.92*	*6.00*
Significant Impact?	No	No	No	No
Building Construction Emissions	**30.03**	**18.74**	**2.12**	**1.99**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No
Architectural Coating Emissions	**2.37**	**1.88**	**0.20**	**0.18**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No
Paving Emissions	**22.39**	**14.82**	**1.26**	**1.16**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*13.00*	*7.00*
Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
[a] Based on the Project's construction assumptions outlined previously, the applicable LST for grading should be based on a maximum daily area of 4.0 acres. As such, the localized thresholds for grading are based on a 4.0-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 12. LST calculated per SCAQMD Linear Regression Methodology.
[b] The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.
Source: Pomeroy Environmental Services, 2015.
Calculation sheets are provided in Appendix A-2 to this Draft IS/MND.

Table 8a
Localized On-Site Peak Daily Operational Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum On-Site Emissions (Site Plan A or B)	**5.34**	**10.35**	**1.87**	**0.56**
SCAQMD Localized Thresholds	*98.00*	*630.00*	*4.00*	*2.00*
Significant Impact?	No	No	No	No

Source: Pomeroy Environmental Services, 2015.
Calculation sheets are provided in Appendix A-2 to this Draft IS/MND.

Toxic Air Contaminants (TAC)

The potential health risks associated with truck operations on the Project site during operation of the Revised Site Plan A Project are shown in Table 9a, Revised Site Plan A Project Health Risk Summary. As shown, health risks attributable to DPM generated by Project truck traffic would not exceed the SCAQMD threshold of ten (10) persons per million as the maximum acceptable incremental cancer risk, and would also not exceed the non-carcinogenic 1.0 health hazard index. As such, health risk impacts with respect to DPM generated by Project truck traffic would be less than significant, and off-site impacts would be reduced compared to the original Site Plan A project. These results presented in Table 9a also conservatively do not include any offset for the health risks associated with existing uses. In addition, the analysis for the Revised Site Plan

A Project was conducted using the most recent version of the AERMOD model, and a receptor grid as suggested by SCAQMD (see Responses to Comments 2-11 and 2-12 in Section 21 of this Final IS/MND). Accordingly, the results presented in Table 9a represent the most conservative assumptions regarding the operations of the Project as well as the most conservative methodologies suggested by SCAQMD, and the results are below the applicable significance thresholds.

Table 9a
Project Health Risk Summary

Receptor	Maximum Incremental Carcinogenic Risk (Persons Per One Million)	Noncarcinogenic Health Hazard Quotient
Residential 70-Year Exposure		
1. Central Avenue Residences	7.65	0.00480
2. Sam Littleton Residences	6.69	0.00420
3. McKinley Avenue Residences	7.65	0.00480
4. Rosecrans Avenue Residences	1.59	0.00010
5. Senior Housing	3.50	0.00220
6. Maximum Off-Site Along Truck Routes	3.82	0.00240
School-Age Child 9-Year Exposure		
1. Worst-Case School-Age Child (Project Site or Truck Route Adjacent)	1.47	0.00480
Worker 40-Year Exposure		
1. Worst-Case Worker	5.34	0.01700
Threshold	10.0	1.0
Significant Impact?	No	No

Source: Pomeroy Environmental Services, 2015.
See Appendix B-2 to this IS/MND for a detailed breakdown of these calculations.

While it is noted that incremental carcinogenic risks approach the level of significance for the Central & McKinley Avenue residences, it is important to understand that these calculations are conservative and represent the worst-case impact scenario. For example, the previous operations of the Project Site have included several heavy industrial land uses utilizing on-site diesel powered equipment and on- and off-site diesel trucks that contribute to elevated ambient health risks in the Project Site vicinity. Specifically, as detailed in the Project's Traffic Report, the Project Site (2014) operations generate approximately 314 daily truck trips. Of this total, approximately 162 are identified as 3-axle trucks (MHD) and 152 are identified as 4-axle trucks (MHD). At present, these trucks all gain access to the Project Site along Central Avenue. These truck trips were not credited against the Project's proposed truck trips and the calculations included in the HRA conservatively assumed all Project truck trips would be "new" to the vicinity of the Project Site. However, if DPM emissions associated with Project Site (2014) truck trips are considered in the risk estimate for Central Avenue residences, cancer risks attributable to the Project would be reduced by approximately 37% to 4.82 per one million.

Revised Site Plan B

Less-Than-Significant Impact. The Revised Site Plan B Project would have similar construction and operational characteristics of the Revised Site Plan A Project.

Localized Construction Emissions

Construction activity under the Revised Site Plan B Project would be similar to the Revised Site Plan A Project, as shown in Table 7a, and would be less than significant. No mitigation measures are required.

Localized Operational Emissions

Operational activity, including traffic generation, under the Revised Site Plan B Project would be the same as the Revised Site Plan A Project, as shown in Table 5a, and would be less than significant. No mitigation measures are required.

e) Create objectionable odors affecting a substantial number of people?

Less-Than-Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors would be a temporary source of nuisance to adjacent uses, but because they are temporary and intermittent in nature, would not be considered a significant environmental impact. Operational project odors are typically associated with heavy industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. While the Project is technically classified as light industrial (warehousing and re-distribution of goods), the Project would not involve the manufacturing of any goods on-site and no discernable operational odors are anticipated. Therefore, impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The Project would not involve the manufacturing of any goods on-site and no discernable operational odors are anticipated. Therefore, impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. The Project would not involve the manufacturing of any goods on-site and no discernable operational odors are anticipated. Therefore, impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

4. BIOLOGICAL RESOURCES

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

No Impact. The Project site has been associated with the Atkinson Brickyard since 1939. The Project site is located in an urbanized area of the City of Compton and is zoned for Heavy Manufacturing (MH) use. When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe

storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.).

Landscaping on-site consists of non-native species located primarily at the edges of the site. The Project site does not contain any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service. Therefore, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service. No impact would occur and no mitigation measures are required.

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

No Impact. No known riparian habitat or other locally or regionally designated sensitive natural communities exist on or adjacent to the Project site.[12] The nearest designated wetland area is at the Earvin Magic Johnson Recreation Center, located approximately 0.66 mile north of the Project site.[13] Therefore, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. No known riparian habitat or other locally or regionally designated sensitive natural communities exist on or adjacent to the Project site. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. No known riparian habitat or other locally or regionally designated sensitive natural communities exist on or adjacent to the Project site. No impact would occur and no mitigation measures are required.

[12] *U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed Jul 1, 2014.*

[13] *Ibid.*

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. No federally protected wetlands (e.g., marsh, vernal pool, coastal) occur on or adjacent to the Project site.[14] Therefore, the Project would not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. No federally protected wetlands (e.g., marsh, vernal pool, coastal) occur on or adjacent to the Project site. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. No federally protected wetlands (e.g., marsh, vernal pool, coastal) occur on or adjacent to the Project site. No impact would occur and no mitigation measures are required.

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

No Impact. There is no native habitat on the Project site, nor does the Project site function as part of a wildlife corridor due to its urbanized development. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. There is no native habitat on the Project site, nor does the Project site function as part of a wildlife corridor due to its urbanized development. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. There is no native habitat on the Project site, nor does the Project site function as part of a wildlife corridor due to its urbanized development. No impact would occur and no mitigation measures are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project site does not contain any protected biological resources or tree species that are considered sensitive. The City does not have a local tree preservation ordinance. Accordingly, the Project would not conflict with any local policies or ordinances protecting or preserving biological resources. No impact would occur and no mitigation measures are required.

[14] *Ibid.*

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any protected biological resources or tree species that are considered sensitive. The City does not have a local tree preservation ordinance. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any protected biological resources or tree species that are considered sensitive. The City does not have a local tree preservation ordinance. No impact would occur and no mitigation measures are required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?

No Impact. No locally designated natural communities are known to occur on or adjacent to the Project site. No Habitat Conservation or Natural Conservation Community Plans exist in the City of Compton. As such, the Project would not conflict with provisions of any such plans. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. No locally designated natural communities are known to occur on or adjacent to the Project site. No Habitat Conservation or Natural Conservation Community Plans exist in the City of Compton. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. No locally designated natural communities are known to occur on or adjacent to the Project site. No Habitat Conservation or Natural Conservation Community Plans exist in the City of Compton. No impact would occur and no mitigation measures are required.

5. CULTURAL RESOURCES

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Less-Than-Significant Impact. The buildings on the Project site were removed under a separate ministerial permit process, outside the scope of the Project, to voluntarily abate potential health risks associated with asbestos in the buildings. Therefore, the following description is provided for informational purposes only:

The Historic Resource Report for the Project site (attached for reference as Appendix C to this Initial Study) concludes that the Project site and the properties adjacent to the Project site do not contain any known historic resources. The Project site, which has been associated with the Atkinson Brick Company, was historically used for the manufacturing of bricks from 1939 to 2002. As discussed in the Historic Resource Report, the need for building materials and supplies during the population booms in 1885 through 1888, 1910, 1923 through 1929, and 1945 through 1965 created a proliferation of lumber yards, planing mills, steel fabricators, and stone and masonry suppliers such as the Atkinson Brick Company. The Atkinson Brick Company was not an early or influential company in the construction industry, did not play a significant role in the history of the

construction industry in the region, and was not part of a historic trend that made a significant contribution to the broad patterns of history. The founder and owner of the Atkinson Brick Company, Benjamin Atkinson, did not make any important contributions to the history of commerce in Compton or the region. Additionally, none of the buildings located on the site at the time the environmental review process commenced, which consisted of an office building, brick manufacturing building, repair shop, brick wrapping shed, and storage shed, were comparable to other industrial buildings that have been listed in the National Register in terms of architectural quality or construction technique and ware not associated with a recognized "master" engineer. The buildings were typical examples of their respective types using common methods of construction and lacked the level of ornamentation or detail associated with properties possessing high artistic values. Further, the office building and brick manufacturing buildings were altered after they were constructed. Neither the Project site nor the buildings that were located on the Project site at the time the environmental review process commenced met the criteria for designation under the National Register of Historic Places or California Register of Historical Resources. Additionally, the Project site and the buildings were not identified as a California Historical Landmark or listed on the National Register of Historic Places, National Register Information System (NRIS).[15] Therefore, impacts with respect to historical resources would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Neither the Project site nor the buildings that were located on the Project site at the time the environmental review process commenced met the criteria for designation under the National Register of Historic Places or California Register of Historical Resources. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Neither the Project site nor the buildings that were located on the Project site at the time the environmental review process commenced met the criteria for designation under the National Register of Historic Places or California Register of Historical Resources. Impacts would be less than significant and no mitigation measures are required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less-Than-Significant With Mitigation Incorporated. The Project site is located in an urbanized area which was previously disturbed by past development, including the open pit clay mine that covers approximately one-quarter of the Project site. Any surficial archaeological resources that may have existed at one time have likely been previously unearthed or disturbed. The Project site is not located in a designated archaeologically sensitive area. Earth movement required to provide finished grade and building pads would be limited to maximum cut depth of approximately 10 feet, and maximum fill depth of approximately seven feet, measured from existing grade. Accordingly, the Project would not involve excavations that would likely encounter archaeological resources. Nevertheless, should archaeological materials be discovered during construction of the Project, they would be handled in accordance with Mitigation Measure CR-1 below. Adherence to the mitigation measure would ensure impacts remain less than significant.

[15] *Brickyard Commerce Center Historic Resource Report, prepared by GPA Consulting, May, 2014 (see Appendix C to this IS/MND). This report was prepared prior to the demolition of the buildings.*

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Revised Site Plan A Project would not involve excavations that would likely encounter archaeological resources. Nevertheless, should archaeological materials be discovered during construction of the Revised Site Plan A Project, they would be handled in accordance with Mitigation Measure CR-1. Adherence to the mitigation measure would ensure impacts remain less than significant.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Revised Site Plan B Project would not involve excavations that would likely encounter archaeological resources. Nevertheless, should archaeological materials be discovered during construction of the Revised Site Plan B Project, they would be handled in accordance with Mitigation Measure CR-1. Adherence to the mitigation measure would ensure impacts remain less than significant.

MM CR-1. *In the event that archaeological resources are unearthed during project earthmoving activities, all earth-disturbing work within a 100-meter radius shall be temporarily suspended or redirected until an archaeologist is provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. Construction personnel shall be informed that unauthorized collection of cultural resources is prohibited.*

If the resource is determined to be significant, the archaeologist shall prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfies the requirements of Public Resources Code § 21083.2. The archaeologist shall complete a report of excavations and findings, submit the report to the South Central Coastal Information Center, and keep the report on file at the South Central Coastal Information Center. After the find is processed in accordance with the approved research design, work in the area may resume.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-Than-Significant With Mitigation Incorporated. The proposed construction associated with the Project would require grading of the Project site. Earth movement required to provide finished grade and building pads would be limited to maximum cut depth of approximately 10 feet, and maximum fill depth of approximately seven feet, measured from existing grade. However, the Project site has been previously disturbed and/or consists of fill that does not have a high probability of uncovering significant vertebrate fossil remains. Any paleontological resources that may have existed at one time have likely been previously disturbed. Nevertheless, paleontological materials could be discovered during construction activities. If paleontological resources are discovered during construction activities, they would be handled in accordance with MM CR-2, which would require ceasing work in the vicinity of paleontological resources and the implementation of any recommendations. Adherence to MM CR-2 would ensure impacts remain less than significant.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Project site has been previously disturbed and/or consists of fill that does not have a high probability of uncovering significant vertebrate fossil remains. Any paleontological resources that may have existed at one time have likely been previously disturbed. If paleontological resources are discovered during construction activities, they would be handled in accordance with MM CR-2. Adherence to the mitigation measure would ensure impacts remain less than significant.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Project site has been previously disturbed and/or consists of fill that does not have a high probability of uncovering significant vertebrate fossil remains. Any paleontological resources that may have existed at one time have likely been previously disturbed. If paleontological resources are discovered during construction activities, they would be handled in accordance with MM CR-2. Adherence to the mitigation measure would ensure impacts remain less than significant.

MM CR-2. *In the event that subsurface paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius shall be temporarily suspended or redirected until a paleontologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. Construction personnel shall be informed that unauthorized collection of cultural resources is prohibited.*

If the resource is determined to be significant, the paleontologist, as appropriate, shall prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfies the requirements of Public Resources Code § 21083.2. The paleontologist shall complete a report of excavations and findings, submit the report to the South Central Coastal Information Center, and keep the report on file at the South Central Coastal Information Center. After the find is processed in accordance with the approved research design, work in the area may resume.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less-Than-Significant With Mitigation Incorporated. The proposed construction associated with the Project would require grading of the Project site. The Project site has not previously been used as a cemetery. Earth movement required to provide finished grade and building pads would be limited to maximum cut depth of approximately 10 feet, and maximum fill depth of approximately seven feet, measured from existing grade. The Project site has previously been extensively disturbed and excavated and the likelihood of encountering human remains on the Project site is minimal. If human remains are unearthed, Health and Safety Code §7050.5 requires that no further disturbance can occur until the County coroner makes the necessary findings as to origin and disposition pursuant to Public Resources Code § 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains. With implementation of Mitigation Measure CR-3, impacts with respect to the discovery and/or disturbance of human remains would be less than significant.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Project site has previously been extensively disturbed and excavated and the likelihood of encountering human remains on the Project site is minimal. With implementation of Mitigation Measure CR-3, impacts with respect to the discovery and/or disturbance of human remains would be less than significant.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would involve similar construction activities. The Project site has previously been extensively disturbed and excavated and the likelihood of encountering human remains on the Project site is minimal. With implementation of Mitigation Measure CR-3, impacts with respect to the discovery and/or disturbance of human remains would be less than significant.

MM CR-3. *If human remains are unearthed, all earth-disturbing work shall be temporarily suspended until the County coroner makes the necessary findings as to its origin and disposition pursuant to Public Resources Code §5097.98. If the remains are determined to be of Native American descent, all earth-disturbing work shall be suspended until the Native American Heritage Commission (NAHC) is notified and determines how to proceed with the remains.*

6. GEOLOGY AND SOILS

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less-Than-Significant Impact. The Project site is located within the seismically active Southern California region and is subject to similar risks as other structures of comparable employment volumes and size, which are located in the Project area. The closest known fault is the Newport-Inglewood fault, which is located about 1,200 feet from the Project site. The Newport-Inglewood fault zone is one of several large predominantly right-lateral strike-slip fault zones that run parallel to the San Andreas Fault.[16] However, the Project site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project site.[17] Therefore, impacts associated with risk of surface rupture due to faulting would be less than significant and no mitigation measures are required.

[16] *Geotechnical Investigation, Proposed Brickyard Commerce Center, Geotechnical Professionals, Inc., May 12, 2014 (see Appendix D to this IS/MND).*

[17] *Ibid.*

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project site. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project site. Impacts would be less than significant and no mitigation measures are required.

(ii) Strong seismic ground shaking?

Less-Than-Significant Impact. The Project site is located within the seismically active Southern California region and is subject to similar risks as other structures of comparable employment volumes and size, which are located in the region. The Project could experience effects of ground shaking resulting from activity on Southern California fault systems. The California Building Code ("CBC"), as adopted by the Compton Municipal Code ("CMC"), regulates the design of buildings to resist forces generated by major earthquakes. Compliance with the CBC, as amended by the CMC, would ensure that potential ground shaking impacts associated with development of the Project would be less than significant. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Revised Site Plan A Project could experience effects of ground shaking resulting from activity on Southern California fault systems. The California Building Code ("CBC"), as adopted by the Compton Municipal Code ("CMC"), regulates the design of buildings to resist forces generated by major earthquakes. Compliance with the CBC, as amended by the CMC, would ensure that potential ground shaking impacts associated with development of the Project would be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Revised Site Plan B Project could experience effects of ground shaking resulting from activity on Southern California fault systems. The California Building Code ("CBC"), as adopted by the Compton Municipal Code ("CMC"), regulates the design of buildings to resist forces generated by major earthquakes. Compliance with the CBC, as amended by the CMC, would ensure that potential ground shaking impacts associated with development of the Project would be less than significant. No mitigation measures are required.

(iii) Seismic-related ground failure, including liquefaction?

Less-Than-Significant Impact. Liquefaction is a phenomenon in which saturated cohesionless soils undergo a temporary loss of strength during severe ground shaking and acquire a degree of mobility sufficient to permit ground deformation. In extreme cases, the soil particles can become suspended in groundwater, resulting in the soil deposit becoming mobile and fluid-like. Liquefaction is generally considered to occur primarily in loose to medium dense deposits of saturated sandy soils. Thus, three conditions are required for liquefaction to occur: (1) a sandy soil of loose medium density; (2) saturated conditions; and (3) rapid, large strain, cyclic loading, normally provided by earthquake motions. The northeast corner of the Project site is located in a seismic hazard zone for liquefaction potential. However, this hazard zone does not extend beneath the proposed buildings. Groundwater was encountered at depths of 72.5 to 74 feet below grade. Although historic groundwater depths at the Project site are shown to be about 30 feet, the majority of the site was likely excluded from the established liquefaction hazard zone because of the age and associated consolidation of the natural older alluvial deposits. Therefore, the subsurface soils, which are predominantly cohesive and dense, exhibit a low potential for liquefaction.[18] As the seismically-induced settlement of the on-site soils is anticipated to be less than a half-inch, impacts with respect to potential liquefaction would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The subsurface soils of the Project site, which are predominantly cohesive and dense, exhibit a low potential for liquefaction. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The subsurface soils of the Project site, which are predominantly cohesive and dense, exhibit a low potential for liquefaction. Impacts would be less than significant and no mitigation measures are required.

(iv) Landslides?

Less-Than-Significant Impact. The Project site and surrounding areas are relatively flat and are completely developed. According to the California Geological Survey, the Project site is not located within an area identified as having a potential for seismic slope instability.[19] There are no known landslides near the Project site, and the Project site is not in the path of any known or potential landslides. As the probability of landslides, including seismically induced landslides, is consider to be very low at the Project site, impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located within an area identified as having a potential for seismic slope instability. Impacts would be less than significant and no mitigation measures are required.

---

18 *Ibid.*

19 *California Geological Survey, USGS AASG Website: http://ngmdb.usgs.gov/maps/mapview/, accessed July 1, 2014.*

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located within an area identified as having a potential for seismic slope instability. Impacts would be less than significant and no mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Less-Than-Significant Impact. The Project site does not contain substantial vegetative cover, paved areas, or permanent structures. Thus, under existing conditions, the Project site is highly susceptible to erosion and sedimentation. The Project will develop the site with pervious and impervious surfaces including structures, paved areas, and landscaping. As such, the proposed development will reduce the rate of erosion on the Project site. Additionally, grading and excavation of the Project site will be limited to that necessary for the installation of building foundations and utilities. Further, all grading activities require grading permits from the City of Compton's Building and Safety Department. Before the City issues grading permits, and pursuant to CMC § 31-1.9-1.11, the Applicant is required to submit a grading and construction activity runoff control program to the City.

Development on-site will also be subject to SCAQMD Rule 403, which requires actions preventing, reducing, and/or mitigating fugitive dust emissions resulting from construction activities (see Question 3(b) above).

The majority of the area surrounding the Project site is completely developed and will not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. As discussed under Question 9(e) below, during construction, the Project will be required to prevent the transport of sediments from the site by stormwater runoff and winds through the use of appropriate Best Management Practices ("BMPs"). These BMPs will be detailed in a Stormwater Pollution Prevention Program (SWPPP), which is required to be acceptable to the City Public Works Director and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. In addition, airborne erosion would be controlled through the implementation of SCAQMD Rule 403 requirements, as discussed under Question 3(b) above. With the implementation of the required construction BMPs and Rule 403 requirements as outlined in these respective sections, soil erosion impacts will be less than significant.

As the Project site will be covered either by structures, pavement or landscaping after completion of construction, long-term operation of the Project will not result in soil erosion or loss of topsoil. Therefore, long-term substantial soil erosion or loss of topsoil is not anticipated and impacts will be less than significant. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. As the Project site will be covered either by structures, pavement or landscaping after completion of construction, long-term operation of the Project will not result in soil erosion or loss of topsoil. Therefore, long-term substantial soil erosion or loss of topsoil is not anticipated and impacts will be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. As the Project site will be covered either by structures, pavement or landscaping after completion of construction, long-term operation of the Project will not result in

soil erosion or loss of topsoil. Therefore, long-term substantial soil erosion or loss of topsoil is not anticipated and impacts will be less than significant. No mitigation measures are required.

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

Less-Than-Significant Impact. Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions 6 (a)(iii) and 6 (a)(iv), above. There is no evidence that the Project site is susceptible to lateral spreading or subsidence.[20] The Project site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. All construction would comply with the CBC, as amended by the CMC, which is designed to ensure safe construction and includes building foundation requirements appropriate to site conditions. Further, no unusual water extractions or other practices that are typically associated with project-related subsidence impacts would occur. With the implementation of CBC requirements (see discussion of Checklist Question 6(a)(ii), above), potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. With the implementation of CBC requirements, potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. With the implementation of CBC requirements, potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. No mitigation measures are required.

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

Less-Than-Significant With Mitigation Incorporated. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Fill soils were encountered ranging in depth from two to 79 feet below existing grade. The fill soils on the Project site are comprised of either documented materials (i.e., soil that was placed and compacted under the direct observation and testing of a registered Geotechnical Engineer), or undocumented materials. The majority of the tested soils were located in the areas where deep fill has been placed as part of an ongoing earthwork operation to fill the former borrow pits related to the brick manufacturing from the previous uses on the Project site. The documented fill materials consisted primarily of sandy clays, clayey sands, and silty sands. The fills contained trace amounts to construction-related debris (i.e., concrete, brick, asphalt, and gravel). The

[20] *Geotechnical Professionals, Inc., op.cit.*

natural soil, located on the Project site, consisted primarily of medium dense clayey sands, silty sands, and sands, and very stiff to hard sandy clays, sandy silts, and clayey silts. The soil was moist, becoming very to moist to wet at depths near the groundwater. The natural soils exhibited relatively low compressibility and high strength characteristics. Undocumented fills and natural soils encountered on the Project site are not considered suitable for construction of the Project. All construction would comply with the CBC, as amended by the CMC, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of CBC requirements (see discussion of Checklist Question 6(a)(ii), above), implementation of all site-specific requirements identified in the Geotechnical Study (see Appendix D to this Initial Study), and implementation of mitigation measure GS-1, potential impacts due to expansive soil would be less than significant.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site includes underlying soils that, if not properly prepared, would not be suitable to support the Project buildings adequately. With the implementation of CBC requirements, implementation of all site-specific requirements identified in the Geotechnical Study, and implementation of mitigation measure GS-1, potential impacts due to expansive soil would be less than significant..

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site includes underlying soils that, if not properly prepared, would not be suitable to support the Project buildings adequately. With the implementation of CBC requirements, implementation of all site-specific requirements identified in the Geotechnical Study, and implementation of mitigation measure GS-1, potential impacts due to expansive soil would be less than significant..

MM GS-1. *Before the City issues building and grading permits, the Chief Building Official of the City Building and Safety Department and the Director of Public Works/Municipal Utilities Department shall review and approve the Geotechnical Study prepared for the Project. The Project shall be designed and constructed in accordance with the recommendations provided in the Geotechnical Study and such additional changes that may be implemented by the Chief Building Official and Director of Public Works/Municipal Utilities.*

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

No Impact. The Project site is located in a developed area of the City of Compton, which is served by a wastewater collection, conveyance and treatment system operated by the City of Compton and the Los Angeles County Sanitation Districts. Although previous uses at the Project site were served by septic systems, use of these systems have been discontinued and the Project would be connected to the City's sewer system, as discussed below under Question 17(b). No septic tanks or alternative disposal systems would be necessary and are not proposed to serve the Project. No impact would occur.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. No septic tanks or alternative disposal systems would be necessary and are not proposed to serve the Revised Site Plan A Project. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. No septic tanks or alternative disposal systems would be necessary and are not proposed to serve the Revised Site Plan B Project. No impact would occur and no mitigation measures are required.

7. GREENHOUSE GAS EMISSIONS

Introduction

Gases that trap heat in the atmosphere are called greenhouse gases ("GHGs"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would have the potential to generate greenhouse gas emissions.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Regulatory Environment

Assembly Bill 32 (Statewide GHG Reductions): The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

CARB has adopted the First Update to the Climate Change Scoping Plan.[21] This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_2e ($MMTCO_2e$). As part of the update, CARB revised the 2020 Statewide limit to 431 $MMTCO_2e$, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual (BAU) forecast in the update is 509 million metric tons of CO_2e. The State would need to reduce those emissions by 15 percent to meet the 431 $MMTCO_2e$ 2020 limit.

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard (RPS): Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010. On April 2, 2011, Governor Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard: California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375): California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards (CALGreen) Code: Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2013 Title 24 standards (effective as of January 1, 2014) were revised and adopted in part to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2014 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and

[21] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014.*

environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less-Than-Significant Impact. Construction and operation of the Project would generate greenhouse gas emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance." Furthermore, as outlined in CEQA Guidelines Section 15064.7(c), "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

In April 2008, the SCAQMD, in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a "GHG CEQA Significance Threshold Working Group." The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA. Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential, non-residential, industrial, etc. However, many of these thresholds are still under development.

On December 5, 2008, the SCAQMD Governing Board adopted a staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with a net increase of 10,000 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year as a screening numerical threshold for industrial projects.

Because the City of Compton does not have an adopted quantitative threshold of significance for an industrial project's generation of greenhouse gas emissions, the following analysis utilizes the SCAQMD's adopted threshold of significance of a net increase of 10,000 $MTCO_2e$ per year for industrial projects. This threshold has been utilized for other industrial projects in SCAB.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (CEQA Guidelines §15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are reported on an annual basis.

As discussed previously, this analysis focuses on the larger and more impactful construction scenario of Site Plan A. Site Plan B would result in less total construction activity and would not exceed the annual GHG construction emissions identified below. In addition, the demolition and removal of debris associated with the existing buildings is outside the scope of the Project. Refer to Appendix E to this IS/MND (Year 2014 Total) for the anticipated annual GHG emissions associated with the demolition activities that are outside the scope of the Project.

Emissions of GHGs were calculated using CalEEMod 2013.2.2 for each year of construction of the Proposed Project (2015 and 2016). The results of this analysis are presented in Table 10, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 10, the greatest annual increase in GHG emissions from Project construction activities is estimated to be 1,957.81 metric tons in 2015 and 1,433.64 metric tons in 2016. Consistent with SCAQMD-recommended methodology, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project, as shown in Tables 12 and 13 below. The total emissions, including construction emissions, are used to determine the significance of GHG emissions associated with the Project.

Table 10
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year)
2015	1,957.81
2016	1,433.64
Total Project Construction GHG Emissions	**3,391.45**

Source: Pomeroy Environmental Services, 2014.
Calculation data and results are provided in Appendix E to this Draft IS/MND.

Project Site (2014) GHG Emissions

When the environmental analysis for the Project commenced (April 2014), activities on the Project site included the reverse mining operation, operation of the pipe storage yard, and phase out of residual brickyard operations (e.g., clearance of storage areas, equipment removal, removal of brick pallets stored on-site, etc.). Designated dirt roadways have been established for truck use while operating on-site. At the time the environmental analysis for the Project commenced, the Project site contained four structures totaling approximately 120,000 square feet and three above ground storage tanks. These uses were identified in the Project's Traffic Impact Analysis Report (Traffic Report) as General Light Industrial (ITE 110). The traffic associated with the existing on-site uses was identified through actual counts of the number and types of vehicles entering and exiting the Project Site during both the AM and PM peak traffic periods. As detailed in the Project's Traffic Report, uses on the Project site (2014) generated approximately 488 unadjusted daily trips. Of this total, approximately 174 (35.7%) were identified as passenger cars (LDA), 162 (33.2%) were identified as 3-axle trucks (MHD), and 152 (31.1%) were identified as 4-axle trucks (HHD). Accordingly, the Project Site (2014) GHG emissions were calculated with CalEEMod based on existing mobile source (motor vehicle) emissions in accordance with the above described fleet mix. These results are presented in Table 11, Project Site (2014) GHG Emissions.

Table 11
Project Site (2014) GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Energy	536.60
Mobile (Motor Vehicles)	2,208.06
Solid Waste Generation	67.69
Water Consumption	138.20
Project Site (2014) Total	**2,950.56**

Source: Pomeroy Environmental Services, 2014
Calculation data and results provided in Appendix E to this Draft IS/MND.

With Project Operational GHG Emissions

Site Plan A

Site Plan A consists of a 1,430,000-square foot light industrial warehouse/distribution building on the main parcel with truck loading doors running north/south and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side. Site Plan A totals 1.5 million square feet of light industrial/warehouse uses. As the future tenants of the Project have not been identified at this time, this analysis assumes that 10% of the 1.5 million square feet light industrial/warehouse use would be refrigerated and 90% would be unrefrigerated. No rail access is proposed. As detailed in the Project's Traffic Report, Site Plan A would generate approximately 2,520 unadjusted daily trips. Of this total, approximately 2,005 (79.57%) are identified as passenger cars, 87 (3.46%) are identified as 2-axle trucks (LHD), 116 (4.64%) are identified as 3-axle trucks (MHD), and 312 (12.33%) are identified as 4-axle trucks (HHD). Accordingly, Site Plan A GHG emissions have been calculated with CalEEMod based on the operation of 1,350,000 sf of unrefrigerated warehouse uses, 150,000 sf of refrigerated warehouse uses, and mobile source (motor vehicle) emissions in accordance with the above described fleet mix. These results are presented in Table 12, Site Plan A GHG Emissions. As shown, the operational GHG emissions generated by Site Plan A would be 7,708.70 $MTCO_2e$, which would not exceed the SCAQMD's interim threshold of significance of 10,000 $MTCO_2e$ per year for industrial projects. Therefore, impacts associated with operational GHG emissions from Site Plan A would be less than significant.

Table 12
Site Plan A GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources (Landscaping)	0.07
Energy	2,620.55
Mobile (Motor Vehicles)	5,556.69
Solid Waste Generation	641.43
Water Consumption	1,727.54
Construction Emissions [a]	113.05
Site Plan A Total	***10,659.33***
Less Project Site (2014) Emissions	2,950.56
Site Plan A Total Net Increase	**7,708.77**

[a] Consistent with SCAQMD recommended methodology, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project.
Source: Pomeroy Environmental Services, 2014.
Calculation data and results provided in Appendix E to this Draft IS/MND.

Site Plan B

Site Plan B consists of a 525,400-square foot light industrial warehouse/distribution building with truck loading doors running east/west on the northwest side of the main parcel, a 481,600-square foot light industrial building with truck loading doors running east/west on the northeast side of the main parcel, and a 70,000-square foot light industrial building off the southern flag lot with single-loaded truck loading doors from the north side. Site Plan B totals 1,077,000 square feet of light industrial/warehouse uses. As the future tenants of the Project have not been identified at this time, this analysis assumes that 10% of the 1,077,000 sf light industrial/warehouse use would be refrigerated and 90% would be unrefrigerated. No rail access is proposed. As detailed in the Project's Traffic Report, Site Plan B would generate approximately 1,810 unadjusted daily trips. Of this total, approximately 1,441 (79.57%) are identified as passenger cars, 63 (3.46%) are

identified as 2-axle trucks (LHD), 84 (4.64%) are identified as 3-axle trucks (MHD), and 222 (12.33%) are identified as 4-axle trucks (HHD). Accordingly, Site Plan B GHG emissions have been calculated with CalEEMod based on the operation of 969,300 square feet of unrefrigerated warehouse uses, 107,700 square feet of refrigerated warehouse uses, and mobile source (motor vehicle) emissions in accordance with the above described fleet mix. These results are presented in Table 13, Site Plan B GHG Emissions. As shown, the operational GHG emissions generated by Site Plan B would be 4,750.54 $MTCO_2e$, which would not exceed the SCAQMD's interim threshold of significance of 10,000 $MTCO_2e$ per year for industrial projects. Therefore, impacts associated with operational GHG emissions from Site Plan B would be less than significant.

Table 13
Site Plan B GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources (Landscaping)	0.05
Energy	1,897.42
Mobile (Motor Vehicles)	3,989.70
Solid Waste Generation	460.55
Water Consumption	1,240.38
Construction Emissions [a]	113.05
Site Plan B Total	***7,701.15***
Less Existing Project Site Total	2,950.56
Site Plan B Total Net Increase	**4,750.59**

[a] *Consistent with SCAQMD recommended methodology, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
Source: Pomeroy Environmental Services, 2014
Calculation data and results provided in Appendix E to this Draft IS/MND.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects and would generate greenhouse gas emissions. The regulatory environment for Revised Site Plan A related to greenhouse gases would be the same as for Site Plan A and Site Plan B.

Construction GHG Emissions

Emissions of GHGs during construction were calculated using CalEEMod 2013.2.2 for each year of construction of the Revised Site Plan A Project (2015 and 2016). The results of this analysis are presented in Table 10a, Revised Site Plan A Project Construction-Related Greenhouse Gas Emissions. As shown in Table 10a, the annual GHG emissions from Project construction activities are estimated to be 1,703.26 metric tons in 2015 and 1,230.52 metric tons in 2016. Construction-related GHG emissions for Revised Site Plan A would be lower as compared to Site Plan A construction GHG emissions. Consistent with SCAQMD-recommended methodology, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project, as shown in Table 12a below. The total emissions, including construction emissions, are used to determine the significance of GHG emissions associated with the Project.

Table 10a
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year)
2015	1,703.26
2016	1,230.52
Total Project Construction GHG Emissions	**2,933.78**

Source: Pomeroy Environmental Services 2015.
Calculation data and results are provided in Appendix E-2 to this Draft IS/MND.

Operational GHG Emissions

Revised Site Plan A Project operational GHG emissions have been calculated with CalEEMod based on the operation of 1,038,600 square feet of unrefrigerated warehouse uses, 115,400 square feet of refrigerated warehouse uses, and mobile source (motor vehicle) emissions. These results are presented in Table 12a, GHG Emissions – Revised Site Plan A. As shown, the total operational and construction GHG emissions generated by the Revised Site Plan A Project would be a maximum of 8,242.95 $MTCO_2e$, (a reduction in GHG Emissions as compared Original Site Plan A). The analysis of Revised Site Plan A GHG emissions conservatively does not take any credit for GHG emissions generated by existing uses on the Project site. The Revised Site Plan A GHG Emissions would not exceed the SCAQMD's interim threshold of significance of 10,000 $MTCO_2e$ per year for industrial projects. Therefore, impacts associated with Project GHG emissions would be less than significant.

Table 12a
GHG Emissions – Revised Site Plan A

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources (Landscaping)	0.06
Energy	2,047.07
Mobile (Motor Vehicles)	4,274.94
Solid Waste Generation	493.47
Water Consumption	1,329.06
Construction Emissions [a]	98.35
Project Total	***8,242.95***

[a] *Consistent with SCAQMD recommended methodology, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
Source: Pomeroy Environmental Services, 2015.
Calculation data and results provided in Appendix E-2 to this Draft IS/MND.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would have similar construction and operational characteristics of the Revised Site Plan A Project and would generate similar greenhouse gas emissions. The regulatory environment for Revised Site Plan B related to greenhouse gases would be the same as for Site Plan A and Site Plan B.

Construction GHG Emissions

Construction activities for Revised Site Plan B would be similar to Revised Site Plan A, as shown in Table 10a.

Operational GHG Emissions

Operational activities and traffic generation for Revised Site Plan B would be similar to Revised Site Plan A, as shown in Table 12a. The total operational and construction GHG emissions generated by the Revised Site Plan B Project would also be a maximum of 8,242.95 $MTCO_2e$, which would not exceed the SCAQMD's interim threshold of significance of 10,000 $MTCO_2e$ per year for industrial projects. This analysis conservatively does not take any credit for GHG emissions generated by existing uses on the Project site. Therefore, impacts associated with Project GHG emissions would be less than significant.

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

Less-Than-Significant Impact. AB 32 represents the statewide plan for reducing California's GHG emissions to 1990 levels by 2020. In addition, the AB 32 Scoping Plan contains the main strategies California will use to reduce the GHGs that cause climate change. The scoping plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 cost of implementation fee regulation to fund the program. The AB 32 Scoping Plan represents a statewide plan for the reduction or mitigation of greenhouse gas emissions that was adopted by the relevant public agency through a public review process in accordance with CEQA Guidelines § 15064.4(b)(3), and constitutes a plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases in accordance with CEQA Guidelines Appendix G.

As noted previously, the current 2013 CALGreen Code standards were revised and adopted in part to respond to the requirements of AB 32 and the Scoping Plan. Specifically, new development projects constructed within California after January 1, 2014, including the proposed project, are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures. In addition and illustrated in the GHG calculations above, motor vehicles are the largest source of GHG emissions generated by the Proposed Project (more than 52%). Motor vehicle-related GHG emissions are regulated at the Federal, State and local levels. As discussed in the CARB Scoping Plan, the transportation sector – largely the cars and trucks that move goods and people – is the largest contributor with 38 percent of the State's total GHG emissions. Many of the transportation-related reduction measures identified in the Scoping Plan are focused on improving motor vehicle efficiencies through more restrictive statewide laws and regulations. Some of these measures include Pavley I & II Standards for light-duty vehicles, Low Carbon Fuel Standards (LCFS), aerodynamic improvements for heavy-duty vehicles, and medium- and heavy-duty vehicle hybridizations. Together, these measures are estimated to reduce 2020 forecasted emissions by 52.60 $MMTCO_2E$. These regulatory measures are aimed at improving efficiencies of the motor vehicle fleet mix across the State, and as such, GHG emissions from motor vehicles accessing the Proposed Project would continue to be reduced into the future as a result of the identified regulatory measures. As the Proposed Project would be required to comply with these regulatory measures, the Proposed Project would be consistent with the goals of AB 32, and would not impair implementation of any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As such, these impacts would be less than significant.

Revised Site Plan A Project

Less-Than-Significant Impact. The Revised Site Plan A Project would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. AB 32 represents the statewide plan for reducing California's GHG emissions to 1990 levels by 2020. The Project would be consistent with the goals of AB 32, and would not impair implementation of any

applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. These impacts would be less than significant.

Revised Site Plan B Project

Less-Than-Significant Impact. The Revised Site Plan B Project would have similar construction and operational characteristics of the Site Plan A and Site Plan B Projects. AB 32 represents the statewide plan for reducing California's GHG emissions to 1990 levels by 2020. The Project would be consistent with the goals of AB 32, and would not impair implementation of any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. These impacts would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less-Than-Significant Impact. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the residential neighborhoods immediately adjacent to the Project site to the north, west, east, and a senior housing facility located immediately east of the Project site's flag lot. Additional sensitive receptors include the residential neighborhood, and the Holy Chapel Baptist Church, across Rosecrans Avenue, south of the Project site. The closest schools to the Project site are the Community Lutheran Church Preschool, approximately 0.18 miles west of the Project site, and Centennial High School, approximately one-quarter mile north of the Project site. The Project would involve two potential site plan options, each of which include the construction of multiple light industrial warehouse/distribution buildings with truck loading doors. Other than typical biodegradable cleaning chemicals used for janitorial and maintenance purposes, no hazardous materials would be routinely used, transported or disposed of in conjunction with the day-to-day operations of the Project. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. The Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. The Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials. Impacts would be less than significant and no mitigation measures are required.

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

Less-Than-Significant Impact. Previous uses on the Project site included brick storage, asphalt and concrete recycling operations, pipe storage, and a truck maintenance facility. Former on-site buildings included a main brick manufacturing building, truck check-in office, storage and maintenance buildings, modular office trailers, and the remaining clay pit excavation area in the

northwestern part of the site. Large stockpiles of primarily concrete rubble and a stockpile of asphalt rubble are present in the northwestern part of the site.[22] As a result of the previous industrial use for clay mining and brick manufacturing, some limited areas of soil contamination (predominantly from soil hydrocarbons) have resulted and have been identified via several rounds of environmental investigations dating back more than 10 years. Remediation of these conditions is occurring concurrently with the activities occurring on the Project site when the environmental analysis of the Project commenced through an Updated Remedial Action Plan (RAP), dated February 7, 2014, which was approved by the Los Angeles County Fire Department's Health Hazardous Materials Division Site Mitigation Unit (SMU). The updated RAP is provided in Appendix H of this IS/MND.

Crude Oil and Drilling Mud

The north central part of the Project site, referred to as the "1940's Backfill Area", was backfilled in the 1940s during World War II with crude oil containing drilling mud (OMUD). This OMUD imported fill material has been identified as being impacted with elevated total petroleum hydrocarbons (TPH) and total recoverable petroleum hydrocarbons (TRPH) concentrations up to 45,000 mg/kg and 58,000 mg/kg, respectively, along with selected heavy metals concentrations in excess of their published screening level regulatory limits. Investigation of underlying soil beneath the OMUD, along with groundwater in the vicinity of the OMUD area have documented that despite the presence of the OMUD being in place for almost 70 years in an unpaved area of the Project site, it has not had an adverse impact on groundwater or underlying soils. As a result of these investigations of the OMUD's potential impact, the OMUD has been approved by SMU to be left in place. Currently, non-impacted fill cover of between three and 15 feet exists over the OMUD, and the planned development has been designed to avoid disturbance or excavation of the OMUD.[23]

ASTs, USTs, Clarifier, and Septic Systems

Two in-use aboveground storage tanks (ASTs), one containing non-potable water and one containing diesel fuel, and a disconnected propane AST have previously been present in the northern part of the Project site. The estimated capacities of the ASTs are reported to be 50,000 gallons, 30,000 gallons, and 2,000 gallons. The water AST was used to store water for dust control at the Project site during clay mining and reverse mining operations. The diesel AST was used to supply fuel for concrete and asphalt recycling equipment and equipment used to backfill the clay pit. Surficial petroleum hydrocarbon-impacted soil has been reported inside the low brick wall enclosure in which the 30,000-gallon diesel AST is located, and will be remediated concurrent with site development as part of the remedial work plan approved by SMU. A 10,000-gallon AST along the south side of the Project site, which stored diesel fuel and was considered to be a potential environmental concern (PEC) in the initial assessment of the property,[24] has been removed.

Five underground storage tanks (USTs) were previously present at the Project site. All have been removed along with adjacent impacted soil, except for an apparent limited quantity of total hydrocarbon impacted soil at 30 feet below ground surface (bgs). The UST removal/leaking UST (LUST) cases have all received regulatory agency case closure.[25]

---

22 *Phase I Environmental Site Assessment, Atkinson Brick Company Property, Tetra Tech, December 20, 2013 (see Appendix F to this IS/MND).*

23 *Phase II Subsurface Investigation, Atkinson Brick Company Property, Tetra Tech, January 10, 2014 (see Appendix G to this IS/MND).*

24 *Tetra Tech, Phase I ESA, op.cit.*

25 *Ibid.*

A clarifier was located on the Project site when that property was owned by B&B Sandblasting Co. prior to 1987. It was subsequently removed by Atkinson Brick Company. A previous subsurface investigation did not find evidence of impacted soil adjacent to this clarifier. Based on the clarifier's removal and the results of soil sampling and analysis, the former clarifier and adjacent soil are not considered to be of environmental concern.[26]

Five, and possibly six, septic systems are present at the Project site. One, and possibly two, septic systems were located west of the former main brick manufacturing building. Additional septic systems include one in the area of a small restroom building adjacent to the west of the ASTs and one reported to be located beneath the former truck check-in office building. One septic system was reported to be present on the east end of the Project site. It is assumed that a septic system would have been present adjacent to the former office building, which has a restroom. It is assumed that all of the septic systems remain at the Project site. Analytical results of previous soil and groundwater sampling at two of the septic systems indicated there was no impact from those septic systems.[27] Septic systems encountered during grading will be removed in their entirety if shallow, however those too deep to remove shall be clean/pumped of contents and filled with slurry containing two sacks of cement per cubic yard. Furthermore, as part of the SMU-approved Updated RAP for the site, a Soil Management Plan (SMP) was also approved by SMU and will be implemented during the grading activity of the Project. The SMP provides for pre-approved procedures for addressing any unknown or previously identified potential adverse environmental conditions which may be encountered during that phase of the Project. Environmental monitoring by qualified personnel will be conducted during the initial ground disturbance activities associated with mass grading per the approved Updated RAP.

Clay Pit

The clay pit in the northwestern part of the Project site is presently being backfilled with imported clean fill. This activity has been ongoing since the environmental analysis commenced in April, 2014. This activity is subject to the oversight of the Regional Water Quality Control Board and the State Mining and Geology Board. To ensure that appropriate fill material is being utilized in this operation, ongoing monitoring and documentation of the fill material is being performed. This monitoring includes qualifying potential import fill soil environmental quality at the import source sites (conducted via performing sampling and analysis of environmental conditions of the fill, if determined necessary by the supplier, who is responsible to the Applicant for meeting the environmental quality specifications for the soil). The applicant is ultimately responsible to the cognizant regulatory agencies for the proper backfill of the pit. Soil conditions are being documented for these agencies. The fill is being compacted and placed as engineered fill, with compaction documentation by a licensed geotechnical engineer. According to a letter dated December 28, 1989 from the Los Angeles County Department of Health Services - Solid Waste Management Program, the Project site was exempt from obtaining a Solid Waste Facilities Permit during backfilling activities because no municipal waste would be placed on the Project Site as part of the backfilling activity.[28]

Water Supply Wells

A water supply well west of the former main brick manufacturing building is approximately 190 feet deep and the water table is at approximately 160 feet below ground surface (bgs). When the well was refurbished in the 1980s, the production was very low, less than one gallon per minute (gpm). An older water supply well is located inside the western part of the former main brick manufacturing building. A water sample collected from one of the water supply wells was reported to have no detectable concentrations of total petroleum hydrocarbons (TPH), volatile organic

[26] *Ibid.*
[27] *Ibid.*
[28] *Ibid.*

compounds (VOCs), or metals.[29] Both well water supply wells are reported to be non-functional at this time.[30] Both wells are scheduled for proper abandonment per Los Angeles County guidelines concurrently with the development of the Project.

Hazardous Materials and Hazardous Waste

Hazardous materials observed across the Project site include lubricants in 55-gallon drums and 5-gallon buckets, diesel fuel in 250-gallon totes and 10,000-gallon to 30,000-gallon ASTs, Plastocene in poly-type ASTs, propane in 40-pound canisters (for forklifts), and smaller retail-sized containers of typical vehicle maintenance chemicals. Hazardous wastes, primarily waste lubricants and oil, and paint-related materials, were observed at the truck maintenance facility. The observed storage, handling, and disposal practices for hazardous materials were not consistent with current standards of practice or best management practices (BMPs). The presence of hazardous materials storage areas was considered to be a Business Environmental Risk (BER) since the materials and wastes would need to be removed from the Project site and disposed of in accordance with applicable regulations prior to its redevelopment.[31] Since initial identification of these materials on-site, all hazardous materials have been consolidated and removed from the Project site and hazardous waste storage areas have been discontinued under appropriate hazardous waste shipping manifests, copies of which have been provided to SMU to document the removal of all of these materials from the Project site.

ACMs and LBP and other LCMs

Asbestos-containing materials (ACMs) were found to be present in the existing buildings on the Project site at the time the environmental analysis commenced. Observed and suspect ACMs included carpet mastic, vinyl floor tile (VFT) remnants and associated mastic, acoustic ceiling tile, drywall and associated joint compound, coating on the corrugated metal siding and ceiling in the former main brick manufacturing building, ductwork insulation in the former main brick manufacturing building, and roofing materials. ACMs were in generally very poor/deteriorated to good condition. All ACMs were removed under SCAQMD supervision. As a separate ministerial permit process, the demolition activity and removal of debris were outside the scope of the Project. Based on the date of construction of the buildings (1939 to 1958), the Phase I ESA identified that lead-based paint (LBP) and other lead-containing materials (LCMs) could be present in the Project site buildings. These materials were all abated/removed concurrently with the demolition of the existing buildings June/July, 2014, under the regulatory supervision of the SCAQMD.

Other Site Conditions

One large pad-mounted transformer was observed through a chain-link enclosure outside the north side of the former main brick manufacturing building. Oily soil in the area of this transformer was previously analyzed by others and found not to contain polychlorinated biphenyls (PCBs). A pole-mounted transformer was also observed adjacent to the truck check-in office. Since the Project site was developed in the 1930s, it is possible that the pole-mounted transformer contains PCBs. No staining or other evidence of leakage associated with the observed pole-mounted transformer was noted.[32] Both of these transformers were removed by Southern California Edison (the owner of the transformers) concurrently with the demolition of the existing buildings in June/July, 2014.

---

[29] *Ibid.*

[30] *Tetra Tech, Phase II ESA, op.cit.*

[31] *Tetra Tech, Phase I ESA, op.cit..*

[32] *Tetra Tech, Phase II ESA, op.cit.*

Fluorescent lighting was observed in the Project site buildings. Fluorescent light ballasts manufactured prior to 1979 may contain small quantities of PCBs. Fluorescent bulbs/tubes contain small amounts of mercury. No evidence of damage to or leakage from the fluorescent bulbs/tubes was observed during the site visit.[33] All fluorescent light tubes (universal waste) and potential PBC ballasts (hazardous waste) were removed and shipped for recycling/disposal utilizing the appropriate waste manifest concurrently with the demolition of the existing buildings in June/July, 2014.

As identified in the Updated Remedial Action Plan and associated Soil Management Plan, any stained or impacted soil previously identified or found to exist during SMP monitoring, in PAOCs will be excavated and disposed of off-site. Furthermore, with the exception of the 1940's Backfill Area, no significant impacts in imported fill have been found on the Project site and groundwater at the site has not been impacted by elevated concentrations of TPHg, TPHd, TPHo, California Code of Regulation (CCR) metals, semi-volatile organic compound (SVOCs), polynuclear aromatics (PNAs) or PCBs. Select areas of underlying groundwater at the Project site have been identified as being impacted with low concentrations of one or more Volatile Organic Compounds (VOCs) emanating from off-site sources. As a component of the Updated Remedial Action Plan, groundwater monitoring will be performed quarterly for one year.[34]

Other than typical biodegradable cleaning chemicals used for janitorial purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Project. Thus, there would not be a significant hazard related to accidental release of hazardous materials into the environment once the Project is occupied. With implementation of the Updated RAP and SMP, as required to the satisfaction of the SMU, impacts would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Remediation of existing hazards and conditions of contamination on the Project site related to these conditions is occurring concurrently with the activities occurring on the Project site through an Updated Remedial Action Plan (RAP), dated February 7, 2014, which was approved by the Los Angeles County Fire Department's Health Hazardous Materials Division Site Mitigation Unit (SMU). Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Remediation of existing hazards and conditions of contamination on the Project site related to these conditions is occurring concurrently with the activities occurring on the Project site through the Updated RAP, under the supervision of the SMU. Impacts would be less than significant and no mitigation measures are required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less-Than-Significant Impact. Two schools are located within one-quarter mile of the Project site, the Community Lutheran Church Preschool (private), approximately 0.18 miles west of the Project site, and Centennial High School (public), approximately one-quarter mile north of the Project site. As discussed in the response to Question 8(a), above, the Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials or the

[33] *Ibid.*

[34] *Tetra Tech, Phase II ESA, op.cit.*

accidental release of hazardous materials. Additionally, as discussed above in the response to Question 8(b), the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and would improve hazardous materials conditions on the Project site through implementation of the Updated RAP and SMP under the supervision of the SMU, which would reduce risks to nearby sensitive receptors, including schools. Therefore, the potential impact associated with the emission of hazardous materials near an existing or proposed school would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B, as are the surrounding land uses. The Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Revised Site Plan A would improve hazardous materials conditions on the Project site through implementation of the Updated RAP and SMP under the supervision of the SMU, Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B, as are the surrounding land uses. The Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Revised Site Plan B would improve hazardous materials conditions on the Project site through implementation of the Updated RAP and SMP under the supervision of the SMU, Impacts would be less than significant and no mitigation measures are required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would it create a significant hazard to the public or the environment?

Less-Than-Significant Impact. Government Code § 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. The Project site is listed on the following databases: US Mines, US Aerometric Information Retrieval System (AIRS), Solid Waste Facilities/Landfill Sites (SWF/LF), Waste Management Unit Database (WMUDS/SWAT), LUST, Cortese/HistCortese, USTs, Emissions Inventory Data (EMI), Los Angeles County Site Mitigation, Los Angeles County Industrial Waste and Underground Storage Tanks (HMS), and National Pollutant Discharge Elimination System (NPDES).[35]

Historically, the Project site was utilized for brick manufacturing from 1939 to 2002, primarily in the northern part. This involved excavation of the western part of the Project site and an area that extended to the southern part of the Project site. Most of the excavated area has been backfilled with imported fill, except for the northwestern part of the site where reverse mining operations are still ongoing. At the time the environmental analysis of the Project commenced, the Site was used

[35] *Tetra Tech, Phase I ESA, op.cit.*

for a variety of purposes, including asphalt and concrete crushing and recycling, brick storage, pipe storage, truck maintenance and parking, and the reverse mining operation.

Remediation of potential hazards is currently taking place on the Project site in accordance with the Updated RAP and SMP, under the supervision of the SMU. Overall, potential areas of concern (PAOCs) are of very limited extent, except for the oil field well drilling mud (OMUD) located in the 1940s Backfill Area. The extent of the 1940s Backfill Area has been well characterized as has the absence of this PAOC's impact on groundwater or upon underlying soils. The OMUD in the 1940s Backfill Area will be left in place below a depth of three feet below ground surface (bgs), per the Updated RAP approved by SMU for the Project site. The remaining soil PAOCs have been identified as being surficial in nature, and along with any stained or impacted soil in these PAOCs will be excavated and disposed of off-site under the Updated RAP and SMP, under the regulatory supervision of the SMU. A Site-specific Health and Safety Plan (HASP) prepared under the direction of a certified industrial hygienist (CIH) experience with soil remediation by excavation and off-site disposal[36] will be used during implementation of the Updated RAP, dated February 7, 2014, and is included within the SMP (the RAP is provided in Appendix H to this Draft IS/MND).

Groundwater beneath selected areas of the Project site has been impacted by low concentrations of VOCs from one or more off-site sources. The off-site sources include, but may not be limited to, the former URS facility at 730 E. 139th Street, the former CCL Plastic Packaging facility at 2501 West Rosecrans Avenue, and the existing Martin's Cleaners at 2339 West Rosecrans Avenue. It should be noted that no on-site soil source of VOCs in groundwater has been found, including the absence of significant impact to groundwater in the 1940s Backfill Area.[37]

Backfill of the remaining clay pit excavation with "clean" imported fill is ongoing by the Project applicant. This imported fill will be placed as engineered fill with compaction documentation by a licensed geotechnical engineer. The RAP and SMP are being implemented at the Project site under the supervision of the SMU. With implementation of the updated RAP and SMP and the requirements contained within these documents, impacts related to hazardous materials sites would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Remediation of existing hazards and conditions of contamination on the Project site related to these conditions is occurring concurrently with the activities occurring on the Project site through the Updated RAP, under the supervision of the SMU. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Remediation of existing hazards and conditions of contamination on the Project site related to these conditions is occurring concurrently with the activities occurring on the Project site through the Updated RAP, under the supervision of the SMU. Impacts would be less than significant and no mitigation measures are required.

[36] *Ibid.*

[37] *Ibid.*

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

Less-Than-Significant Impact. The Project site is not located within a public airport land use plan area. However, it is located within two miles of a public airport, the Compton/Woodley Airport, located approximately 1.0 mile south of the Project site. However, the Project site is not in an airport hazard area.[38] Furthermore, structures under the Project would not exceed the height of those in the vicinity of the Project site and would adhere to all Federal Aviation Administration regulations, including those related to building identification and lighting. Therefore, impacts related to aviation safety would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not in an airport hazard area. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not in an airport hazard area. Impacts would be less than significant and no mitigation measures are required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no private airstrips in the vicinity of the Project site. Therefore, the Project would not result in airport-related safety hazards related to private airstrips for the people residing or working in the area. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. There are no private airstrips in the vicinity of the Project site. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. There are no private airstrips in the vicinity of the Project site. Impacts would be less than significant and no mitigation measures are required.

g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-Than-Significant Impact. Construction of the Project would not substantially impede public access or travel upon public rights-of-way and would not interfere with an adopted emergency response plan or emergency evacuation plan. As discussed in the response to Question 16(a), the Project would not result in a significant traffic impact on any of the surrounding signalized intersections. Furthermore, as discussed in the responses to Questions 14(a) and 14(b), the Project would have a less than significant impact with respect to fire and

[38] *Los Angeles County Airport Land Use Plan, December 1, 2004.*

police services, including emergency response. The City of Compton Fire Department (CFD) has reviewed the preliminary site plans and the proposed project would be required to undergo a separate plan check process with CFD before the issuance of building permits. The CFD review will ensure adequate emergency access. As such, the Project would have a less than significant impact with respect to emergency response and evacuation plans and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Construction of the Project would not substantially impede public access or travel upon public rights-of-way and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Construction of the Project would not substantially impede public access or travel upon public rights-of-way and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation measures are required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project site is located in an urbanized portion of the City of Compton, which does not contain any wildlands or high fire hazard terrain or vegetation. Therefore, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is located in an urbanized area that does not contain any wildlands or high fire hazard terrain or vegetation. No impact would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is located in an urbanized area that does not contain any wildlands or high fire hazard terrain or vegetation. No impact would occur and no mitigation measures are required.

9. HYDROLOGY AND WATER QUALITY

a) Violate any water quality standards or waste discharge requirements?

Short-term Construction Impacts

Less-Than-Significant Impact. Project construction activities have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. However, because the proposed construction site would be greater than one acre in size, construction activities associated with the Project would be required to meet the requirements for storm water quality contained in the

Statewide General Permit for Stormwater Discharges Associated With Construction and Land Disturbance Activities (NPDES No. CAS000002, State Water Resources Control Board Order No. 2012-0006-DWQ, the "Statewide General Construction Permit"). In addition, construction associated with the Project would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, NPDES No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Compton) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Project would be required to implement the applicable BMPs identified in the Statewide General Construction Permit and Los Angeles County MS4 permit that would meet or exceed local, State, and Federal mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized include disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; stabilizing disturbed soil area; covering trucks; keeping construction equipment in good working order; installing and maintaining a stabilized construction entrance; providing perimeter sediment control; and installing sediment traps or basins during construction activities.

Under existing regulations, as the Project site is over one acre in size, the contractor will file a Notice of Intent (NOI) with the State Water Resources Control Board and prepare a Storm Water Pollution Prevention Plan (SWPPP) before the start of any construction activity. Implementation of the BMPs in the Project SWPPP and compliance with the City's discharge requirements (ESMC §§ 5-4-1, *et seq*.) will ensure that project construction will not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Adherence to these regulations will ensure that project-related water quality impacts during construction will be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Construction under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Implementation of the BMPs in the Project SWPPP and compliance with the City's discharge requirements will ensure that project construction will not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Adherence to these regulations will ensure that project-related water quality impacts during construction will be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Construction under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Implementation of the BMPs in the Project SWPPP and compliance with the City's discharge requirements will ensure that project construction will not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Adherence to these regulations will ensure that project-related water quality impacts during construction will be less than significant and no mitigation measures are required.

Long-term Operational Impacts

Less-Than-Significant Impact. With respect to runoff water quality during operation of the Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.7 of this Permit, Planning and Land Development Program, is applicable to, among others, development projects equal to one acre or

greater of disturbed area and adding more than 10,000 square feet of impervious surface area and would thus apply to the Project. This Program requires, among other things, that projects retain on site the runoff volume from: (a) the .75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The water quality design for the Project complies with the 2014 Los Angeles County Low Impact Development (LID) Manual, which implements the requirements of the Los Angeles County MS4 Permit in those areas of Los Angeles County served by storm drainage facilities operated by the Los Angeles County Department of Public Works. The LID goals of increasing groundwater recharge, enhancing water quality, and preventing degradation to downstream natural drainage courses, as outlined in LID Manual, were used in considering treatment method alternatives.

The LID manual outlines LID BMPs and establishes a hierarchy of treatment methods as follows:

1. BMPs that promote infiltration
2. BMPs that storage and beneficially use stormwater runoff
3. BMPs that utilize the runoff for water conservation uses (Biofiltration)

The highest level on the hierarchy is required to be used unless it is technically infeasible to do so. Infiltration BMPs are considered feasible if the underlying soil infiltration rates are 0.3 inches per hour. The Manual also outlines a maximum drawdown time of 96 hours to minimize vector control issues.

The County requires treatment of the 85th percentile rainfall depth or 0.75 inches, whichever is greater. The 85th percentile rainfall at the Site is 0.9 inches, per the latest information from the County. The site soils have been tested by the geotechnical engineer to determine the in-situ infiltration rates. Three tests were taken at each basin location. The infiltration rates measured at the north basin were 0.1 inches per hour, 0.4 inches per hour, and 0.8 inches per hour, for an average of 0.43 inches per hour. The infiltration rates measured at the north basin were 0.6 inches per hour, 0.0 inches per hour, and 0.4 inches per hour, for an average of 0.33 inches per hour. In the case of each basin, infiltration is considered feasible, though given the relatively low infiltration rates, secondary biofiltration will also be provided in the event that the infiltration system clogs. The Project site is not in an area of the County where hydromodification analysis is required.

The Project would also be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Compton is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project (see Appendix I for the Draft SUSMP for the Project). In compliance with the MS4 Permit and SUSMP requirements, the Project would be required to either retain and percolate stormwater flows on-site, or store and reuse storm water on-site for beneficial purposes. If percolation on-site would not be allowed due to underlying soils lacking the necessary infiltration rates to support infiltration, or because of the potential for infiltrated rain water to cause migration of underground contaminants, the Project would be required to treat and/or filter stormwater runoff through biofiltration before it enters the stormwater drainage system. As discussed below under Question 9(c), the Project includes accommodation for multiple on-site detention facilities that would meet SUSMP and MS4 permit requirements. Any system incorporated into the Project must follow specific design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. No mitigation measures are required.

b) Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there will be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells will drop to a level which will not support existing land uses or planned uses for which permits have been granted)?

Less-Than-Significant Impact. The Los Angeles Water Quality Control Board region overlies 14 major regional groundwater basins as identified by the Los Angeles Region Water Quality Control Board's Basin Plan. The Project Site is located within the Los Angeles Coastal Plain, which includes the Palos Verdes Hydrological Sub-Area, the West Coast Hydrological Sub-Area, the Santa Monica Hydrological Sub-Area, the Hollywood Hydrological Sub-Area, and the Central Hydrological Sub-Area. The Project Site is located in the Central Hydrological Sub-Area within the Los Angeles Coastal Plain Hydrological Area within the Los Angeles-San Gabriel Valley Hydrological Unit.[39] Currently, surface water runoff from the Project site either percolates on-site or flows onto the surrounding roadways and adjacent properties and into the existing storm drain infrastructure. As the Project site is essentially unpaved, the potential for percolation is relatively high as compared to urban uses. However, the Project does not involve deep excavations that have the potential to intercept existing aquifers (i.e., maximum excavation depth 7-10 feet), nor will it involve additions (with the exception of normal water percolation from rainfall/landscape irrigation) or withdrawals of groundwater. In accordance with the Updated RAP, as overseen by the SMU, a Land Use Covenant (LUC) will be placed on the property as a condition of closure of the remediation effort, and the LUC will prohibit withdrawal/use of groundwater from the Site. The LUC will not affect the Project's adjudicated rights to extract water from the Central Basin (see Water Supply Assessment, Appendix L to this IS). These rights can be exercised through off-site well locations. In addition, as rainfall in the Project area is not considered to be a substantial contribution in the Project area, the increase in impervious surfaces at the Project site will not interfere with groundwater recharge. Impacts will be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project does not involve deep excavations that have the potential to intercept existing aquifers, nor will it involve additions or withdrawals of groundwater. The increase in impervious surfaces at the Project site will not interfere with groundwater recharge. Impacts would be less than significant and no mitigation measures are required.

[39] *Los Angeles Region Water Quality Control Board, Basin Plan, Page 1-6, and Page 1-7, Figure 1-2, Hydrologic Units.*

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project does not involve deep excavations that have the potential to intercept existing aquifers, nor will it involve additions or withdrawals of groundwater. The increase in impervious surfaces at the Project site will not interfere with groundwater recharge. Impacts would be less than significant and no mitigation measures are required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which will result in substantial erosion or siltation on- or off-site?

Less-Than-Significant Impact. The Project site is located in a highly urbanized area and is served by the existing storm drain infrastructure. The Project will alter the existing drainage patterns on the Project site as it will be developed with pervious and impervious surfaces including structures, paved areas, and landscaping.

In the existing condition, a small portion of the south end of the Project site surface drains to Rosecrans Avenue. The majority of the site drains toward to the north. The northeast portion of the site surface drains to Central Avenue and Sam Littleton Street where the runoff flows in curb and gutter sections to County of Los Angeles catch basins at the southwest quadrant of the Central Avenue/Sam Littleton intersection. The majority of the Project site drains to the mining pit in the northwest portion of the property and seeps into the subsurface soils.

The County of Los Angeles (Los Angeles County Flood Control District (LACFD)) owns and maintains several drains in the vicinity of the Project. The LACFD 134th Street Storm Drain system is sized to accommodate the drainage from the Project site up to a pre-determined limit based on system hydraulics. LACFD has identified that up to 1.2 cubic feet per second (cfs) per acre can be discharged from the Site into the 134th Street Storm Drain. The proposed drainage from the Project site will be routed to the 134th Street storm drain at the intersection of Sam Littleton Street and the Central Avenue residential frontage street. The on-site drainage areas will be routed to two different detention/retention basins. The southerly 6 acres of the site would be routed to the south basin. The northerly 49.6 acres would drain to the north detention/retention basin. The discharge pipes from the basins are connected together and routed to the 134th Street storm drain connection point.

A system of catch basins, roof drains, and underground storm drain pipes will be routed to perforated pipes beneath the basins. Each basin will be underlain by topsoil, sand, and gravel layers that will store a portion of the first flush rainfall. The primary perforated pipe beneath each basin will be a “dead-end” pipe. The initial runoff from each storm event will collect in the perforated pipes, seep through the perforations in the pipes into the surrounding gravel layers, and fill both the pipe and adjacent gravel. Once the pipe and gravel layers are full, the additional runoff will bubble through catch basins at the bottom of the basins and fill the basins. Once the dead storage in the basins is filled, excess runoff will drain through open risers in each basin. The risers then connect to the basin outlet pipes.

Each basin allows for 36 inches of dead storage and has a 36 inch tall riser. There is an additional 36 inches above the rim of the riser. The bottom 36 inches of each basin functions as a biofiltration basin with an additional 36 inches of soil below the basin. Subdrains will be located at intervals in the soil layer to minimize permanent standing water (i.e., water within the basin will infiltrate within 4 days from the end of any storm event). The upper 36 inches of each basin will function as a detention basin with the top of the riser as an outlet.

While the Project will increase off-site storm water flows over that generated by existing conditions, the flows will be limited to the allowable discharge rate as defined by LACFD, the owner of the receiving storm drain system. Control of flows to the storm drain system consistent

with the allowable discharge rate will be provided by the on-site retention/detention facilities. As such, Project development will not alter drainage patterns such that Project development results in on- or off-site flooding or additional polluted runoff. Detailed plans for the Project site will be submitted to the City as part of the development plan approval process before issuance of building and grading permits. A connection/construction permit from LACFD will be required prior to construction of this drain based upon a hydrology report and storm drain plan approved by LACFCD.

In addition, the Project site is not located adjacent to any stream or river. Therefore, the potential impact associated with the siltation and/or erosion due to altered drainage patterns will be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. While the Project will increase off-site storm water flows over that generated by existing conditions, the flows will be limited to the allowable discharge rate as defined by LACFD. Control of flows to the storm drain system consistent with the allowable discharge rate will be provided by on-site retention/detention facilities. As such, Project development will not alter drainage patterns such that Project development results in on- or off-site flooding or additional polluted runoff. In addition, the Project site is not located adjacent to any stream or river. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. While the Project will increase off-site storm water flows over that generated by existing conditions, the flows will be limited to the allowable discharge rate as defined by LACFD. Control of flows to the storm drain system consistent with the allowable discharge rate will be provided by on-site retention/detention facilities. As such, Project development will not alter drainage patterns such that Project development results in on- or off-site flooding or additional polluted runoff. In addition, the Project site is not located adjacent to any stream or river. Impacts would be less than significant and no mitigation measures are required.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which will result in flooding on- or off site?

Less-Than-Significant Impact. The Project site is located in a highly urbanized area and is served by existing storm drain infrastructure. The Project site is not located adjacent to any stream or river, and project runoff will continue to drain into existing City storm drain infrastructure. The Project will not alter the existing drainage pattern and will be designed to drain to the street and existing storm drains. As such, Project development will not alter drainage patterns such that Project development results in on- or off-site flooding or additional polluted runoff. Impacts will be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located adjacent to any stream or river, and project runoff will continue to drain into existing City storm drain infrastructure. The Project will not alter the existing drainage pattern and will be designed to drain to the street and existing storm drains. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not located adjacent to any stream or river, and project runoff will continue to drain into existing City storm drain infrastructure. The Project will not alter the existing drainage pattern and will be designed to drain to the street and existing storm drains. Impacts would be less than significant and no mitigation measures are required.

e) Create or contribute runoff which will exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less-Than-Significant With Mitigation Incorporated. Urban runoff discharged from municipal storm drains has been identified by local, regional, and national research programs as a principal cause of water quality problems in urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. Existing regulations require new development projects to adopt and implement site-specific mitigation measures to control stormwater runoff.

Construction-Related Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. As discussed in the response to Question 9(a) above, Project construction activities will be conducted in accordance with all applicable local, State, and Federal regulations, including NPDES requirements; will include BMPs that will meet or exceed local, State, and Federal mandated guidelines; will provide a SWPPP; and will be compliant with the requirements of the CMC. Adherence to these practices would reduce short-term construction impacts related to potentially polluted runoff to a less than significant level, and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Project construction activities will be conducted in accordance with all applicable local, State, and Federal regulations, including NPDES requirements; will include BMPs that will meet or exceed local, State, and Federal mandated guidelines; will provide a SWPPP; and will be compliant with the requirements of the CMC. Adherence to these practices and Mitigation Measure HY-1 would reduce short-term construction impacts related to potentially polluted runoff to a less than significant level, and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Project construction activities will be conducted in accordance with all applicable local, State, and Federal regulations, including NPDES requirements; will include BMPs that will meet or exceed local, State, and Federal mandated guidelines; will provide a SWPPP; and will be compliant with the requirements of the CMC. Adherence to these practices and Mitigation Measure HY-1 would reduce short-term

construction impacts related to potentially polluted runoff to a less than significant level, and no mitigation measures are required.

MM HY-1. *The Project shall implement the following SWPPP BMPs:*

- *During construction and operation, all waste shall be disposed of in accordance with all applicable laws and regulations. Properly labeled recycling bins shall be utilized for recyclable construction materials including solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials and wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed, regulated disposal site by a licensed waste hauler.*
- *All leaks, drips and spills occurring during construction shall be cleaned up promptly and in compliance with all applicable laws and regulations to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.*
- *If materials spills occur, they should not be hosed down. Dry cleaning methods shall be employed whenever possible.*
- *Construction dumpsters shall be covered with tarps or plastic sheeting if left uncovered for extended periods. All dumpsters shall be well maintained.*
- *The project applicant/developer shall conduct street sweeping and truck wheel cleaning to prevent dirt in storm water.*
- *The project owner/developer shall provide regular sweeping of private streets and parking lots with equipment designed for removal of hydrocarbon compounds.*
- *The amount of exposed soil shall be limited and erosion control procedures implemented for those areas that must be exposed.*
- *Grading activities shall be phased so that graded areas are landscaped or otherwise covered, as quickly as possible after completion of activities.*
- *Appropriate dust suppression techniques, such as watering or tarping, shall be used in areas that must be exposed.*
- *Sandbags shall be placed at the perimeter of the construction area to control off-site migration of pollutants.*
- *Construction entrances shall be designed to facilitate removal of debris from vehicles exiting the site, by passive means such as paved/graveled roadbeds, and/or by active means such as truck washing facilities.*
- *Simple sediment filters, basins, or traps shall be constructed at or near the entrances to the storm drainage system wherever feasible.*

Operational Impacts

The Project site does not contain substantial vegetative cover, paved areas, or permanent structures. Thus, under existing condition the Project site is highly susceptible to erosion and sedimentation. The Project will develop the site with pervious and impervious surfaces including structures, paved areas, and landscaping. As such, the proposed development will reduce the rate of erosion on the Project site. As noted above, the Project will provide BMPs designed to either retain and percolate stormwater flows on-site, or store and reuse storm water on-site for beneficial purposes, or will treat and/or filter stormwater runoff through biofiltration before it enters the stormwater drainage system in order to control storm water runoff contamination after construction.

The primary source of operation-related water pollutants will be from the deposition of certain chemicals by cars in the parking areas and on internal driveway surfaces. Chemicals that vehicles typically contribute to the storm drain system include metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids. Implementation of the Project will direct all

stormwater flows in accordance with the requirements of the SUSMP and County MS4 permit. The Project will be required to incorporate design criteria requirements established in the SUSMP for Los Angeles County and the CMC to control the off-site conveyance of pollutants. As such, with the implementation of the following mitigation measures, the Project's impacts related to stormwater runoff water quality will be reduced to a less than significant level.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project will direct all stormwater flows in accordance with the requirements of the SUSMP and County MS4 permit. The Project will be required to incorporate design criteria requirements established in the SUSMP for Los Angeles County and the CMC to control the off-site conveyance of pollutants. With the implementation of the Mitigation Measures HY-2 through HY-5, the Project's impacts related to stormwater runoff water quality will be reduced to a less than significant level.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project will direct all stormwater flows in accordance with the requirements of the SUSMP and County MS4 permit. The Project will be required to incorporate design criteria requirements established in the SUSMP for Los Angeles County and the CMC to control the off-site conveyance of pollutants. With the implementation of the Mitigation Measures HY-2 through HY-5, the Project's impacts related to stormwater runoff water quality will be reduced to a less than significant level.

MM HY-2. *Prior to the issuance of any grading permit, the Applicant shall submit a Standard Urban Stormwater Mitigation Plan (SUSMP) for review and approval by the City of Public Works/Municipal Utilities Department.*

MM HY-3. *The Applicant shall maintain all structural or treatment control BMPs identified in the SUSMP for the life of the project.*

MM HY-4. *Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, without limitation, a cabinet, shed, or similar sheltered enclosure; or (2) protected by secondary containment structures such as berms, dikes, or curbs. The enclosures and/or secondary containment structures that would be used shall be approved by the Director of Public Works/Municipal Utilities.*

MM HY-5. *The Applicant shall obtain a connection permit to the storm drain system from LACFCD based upon a hydrology report and storm drain plan approved by LACFCD.*

f) Otherwise substantially degrade water quality?

Less-Than-Significant Impact. A significant impact may occur if a project will include potential sources of water pollutants that will have the potential to substantially degrade water quality. Other than the sources discussed above, as described in the responses to Questions 9(a) and 9(e), the Project will not include other potential sources of water contamination. Therefore, the Project will not degrade water quality and impacts will be less than significant. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project will not include other potential sources of water contamination. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project does not include the development of housing. Impacts would be less than significant and no mitigation measures are required.

g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project does not include the development of housing. The 50, 100 and 500-year flood plains are defined as flooding that would result from a rainstorm with the probability of occurring once every 50, 100 and 500 years respectively. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map program, the Project site is located within a Flood Zone X, defined as an area determined to be outside of the 0.2% annual chance floodplain and is therefore in an area determined to be outside of the 50, 100 and 500-year flood zones.[40] No impact will occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project does not include the development of housing and the Project site is located within Flood Zone X, outside of the 50, 100 and 500-year flood zones. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project does not include the development of housing and the Project site is located within Flood Zone X, outside of the 50, 100 and 500-year flood zones. No impacts would occur and no mitigation measures are required.

h) Place within a 100-year flood hazard area structures which will impede or redirect flood flows?

No Impact. The Project site is not located in a FEMA 100-year floodplain.[41] As such, the Project will not place structures that will impede or redirect flood flows within a 100-year flood hazard area. Therefore, the Project will not introduce structures to an area of high flood risk such that flows will be impeded or redirected. No impact will occur and no mitigation measures are required.

---

[40] *FEMA Flood Insurance Rate Map (FIRM), Los Angeles County, California Panel 1795 of 2350, website: http://map1.msc.fema.gov/idms/IntraView.cgi?ROT=0&O_X=7204&O_Y=5088&O_ZM=0.077234&O_SX=1112&O_SY=721&O_DPI=400&O_TH=52642243&O_EN=52665603&O_PG=1&O_MP=1&CT=0&DI=0&WD=14408&HT=10358&JX=1432&JY=781&MPT=0&MPS=0&ACT=1&KEY=52641684&ITEM=1&PICK_VIEW_CENTER.x=759&PICK_VIEW_CENTER.y=367&R1=VIN, accessed July 7, 2014.*

[41] *Ibid.*

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is located outside of the 100-year flood zone. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is located outside of the 100-year flood zone. No impacts would occur and no mitigation measures are required.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. There are no levees or dams in the project vicinity. Additionally, as mentioned above, the Project site is not located in a FEMA 100-year floodplain. The Los Angeles County General Plan Safety Element does not identify any potential inundation areas within the City of Compton (Plate 6, Flood and Inundation Hazards). Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, will occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Los Angeles County General Plan Safety Element does not identify any potential inundation areas within the City of Compton (Plate 6, Flood and Inundation Hazards). No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Los Angeles County General Plan Safety Element does not identify any potential inundation areas within the City of Compton (Plate 6, Flood and Inundation Hazards). No impacts would occur and no mitigation measures are required.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The closest body of water to the Project site is the Pacific Ocean, which is located approximately 10 miles west of the Project site. Since the Project site is not located in close proximity to a contained body of water, there is no potential impact associated with a seiche or tsunami. With respect to the potential impact from a mudflow, the Project site is relatively flat and is surrounded by urban development; therefore, it does not contain any sources of mudflow. There are no major hills or steep slopes in the Project vicinity. Therefore, no impact will occur with respect to risk of loss, injury, or death by seiche, tsunami, or mudflow and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. As the Project site is not located in close proximity to a contained body of water, there is no potential impact associated with a seiche or tsunami. There are no major hills or steep slopes in the Project vicinity. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. As the Project site is not located in close proximity to a contained body of water, there is no potential impact associated with a seiche or tsunami. There are no major hills or steep slopes in the Project vicinity. No impacts would occur and no mitigation measures are required.

10. LAND USE AND PLANNING

a) Physically divide an established community?

No Impact. The Project is not of the scale or nature that could physically divide an established community. The Project site is located within an urban area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project site. Further, no streets or sidewalks would be permanently closed as a result of the development of the Project. As per City requirements, widening of streets that would occur under the Project would be marginal and would not result in barriers between the Project site and surrounding uses. No separation of uses or disruption of access between land use types would occur as a result of the Project. Therefore, implementation of the Project would not disrupt or divide the physical arrangement of the established community. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project would not disrupt or divide the physical arrangement of the established community. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project would not disrupt or divide the physical arrangement of the established community. No impacts would occur and no mitigation measures are required.

b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less-Than-Significant Impact. The Project site is subject to the development regulations and policies set forth in the 1991 City of Compton General Plan and Zoning regulations (Title XXX, Compton Municipal Code). The Land Use Element of the General Plan designates the Project site as Mixed Use. This designation envisions two types of mixed use developments: (1) mixed residential, retail and service businesses along arterial highways; and/or (2) an integrated development of professional office, retail and service commercial, and light industrial land uses in a business park setting. The latter description applies to the Project site, which is part of the 104 acre 'Brickyard'-superblock, bordered by Sam Littleton Street, Central Avenue, Rosecrans Avenue and McKinley Avenue and designated as "Mixed Use" in the current General Plan. This superblock currently has a mix of uses including multi-family residential, retail, service/commercial, and light industrial. A largely unoccupied retail center, with a remnant residential use behind it, is located at the southern edge of the central portion of the superblock. In addition to the Project, two new industrial projects are proposed at the southwestern edge of the Project site within the superblock. These include a 140,000 square foot industrial building at the northeast corner of Rosecrans and McKinley Avenues on the site of the existing recycling center, and a 145,800 square foot industrial building on a vacant site off McKinley Avenue just south of the Project site. Properties designated for Mixed Use require a minimum project area of

two acres. A maximum overall floor area ratio (FAR) of 0.75:1 is established for this Mixed Use designation.

The Project would also be subject to the City's zoning requirements. The Project site is zoned MH – Heavy Manufacturing. The MH zone permits the development of manufacturing and storage uses for products and chemicals that have the potential to result in substantial impacts, including such uses as steel mills, forges, and foundries. The MH zone requires a minimum 20,000 square foot parcel and a minimum width of 100 feet. The zone establishes a maximum site coverage ratio of 50% and establishes a height limit of 75 feet.

Subject to the recommended conditions of the Planning Commission, the Project would be consistent with the Mixed Use designation of the Project site. The Project uses would be consistent with the existing uses within the Mixed Use superblock, which include shopping centers with retail and restaurant uses, a senior housing facility, a bus maintenance yard, a solid waste transfer station and recycling facility, a home improvement center, and a recycling center. As discussed elsewhere, the Project would not generate levels of truck traffic that would result in significant adverse impacts to surrounding residential areas (see Sections 2(d) – Health Risk, and 12(a) – Noise, of this IS/MND). Moreover, the Project would result in a limited increase in PM peak hour truck trips (i.e., increase of 11 trips (42%) for Site Plan A, and increase of 1 trip (0.4%) under Site Plan B), and a net decrease in AM peak hour trips (25 fewer trips under Site Plan A, and 34 fewer trips under Site Plan B). The Project would comply with the 0.75:1 FAR limitation for the Mixed Use land use designation.

The Project would also be consistent with the MH zoning of the Project site, as proposed new development for Site Plans A and B will consist of permitted light industrial/warehouse uses, and will comply with the 50 percent parcel coverage limitation of the MH zone and the 75 foot height limitation. Specifically, development on Site Plan A would cover approximately 42% of the gross area of the Project site (approximately 43% of the net area), with a floor area ratio (FAR) of approximately 0.60:1 (based on gross area), and approximately 0.61:1 (based on net area). Site Plan B would cover approximately 41% of the gross area of the Project site (approximately 43% of the net area), with FAR approximately 0.42:1 (based on gross area) and approximately 0.44:1 (based on net area). The proposed buildings, under both site plan options, would be single-story with mezzanine, and up to a maximum of 52 feet in height, which is under the MH zone's 75 foot height limit.

The Project includes a parcel map that would consolidate the 12 existing parcels within the Project site. This action would facilitate the development of the Project and have no environmental impacts beyond those identified for the Project.

The Project includes a modified parking request pursuant to a proposed Text Amendment to the Compton Municipal Code under consideration by the City that would allow flexible parking standards for large project sites. The proposed Text Amendment currently under consideration by the City would permit the establishment of Modified Parking Requirement (MPR) Districts within the City under which a parking demand study would be prepared to the satisfaction of the Planning Department, and the Planning Commission would be required to find that the Project's MPR District provides adequate parking within the proposed district boundaries to meet parking demand for the facilities or uses located within the district, and that the minimum parking required based on a parking demand study is desirable to promote economic development and is in the interest of the public welfare. Because the process that would be established under the proposed Text Amendment would ensure that adequate parking is provided to meet the parking demands of individual facilities and thereby not affect adjacent uses as a result of overflow parking, the proposed Text Amendment would not result in environmental impacts beyond those associated with the underlying projects. Moreover, any future request for an MPR District would be subject to its own independent discretionary review and CEQA process by the City. Accordingly the proposed Text Amendment would have no environmental impacts beyond those identified for the Project.

The Project would not conflict with the City of Compton General Plan or zoning requirements, and would be in compliance with all CMC requirements. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar design and land use characteristics as Site Plan A and Site Plan B. The Project would not conflict with the City of Compton General Plan or zoning requirements, and would be in compliance with all CMC requirements. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar design and land use characteristics as Site Plan A and Site Plan B. The Project would not conflict with the City of Compton General Plan or zoning requirements, and would be in compliance with all CMC requirements. Impacts would be less than significant and no mitigation measures are required.

c) Conflict with any applicable habitat conservation plan or natural community's conservation plan?

No Impact. The Project is located within an urbanized area and, does not contain biological resources. As discussed in the response to Question 4(a) above, the Project site is not identified as being within a habitat conservation plan or natural community conservation plan; as such, the Project would not conflict with any such plans. Therefore, no impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not identified as being within a habitat conservation plan or natural community conservation plan; as such, the Project would not conflict with any such plans. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site is not identified as being within a habitat conservation plan or natural community conservation plan; as such, the Project would not conflict with any such plans. No impacts would occur and no mitigation measures are required.

11. MINERAL RESOURCES

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

No Impact. The Project site was previously developed as a brickyard with an on-site pit that provided raw materials for the prior use. This operation did not provide materials for other brickyard facilities or for regional use. No classified or designated mineral deposits of regional or statewide significance are known to occur on the Project site. Further, no oil wells exist or are

known to have previously existed on the Project site.[42] Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts would occur and no mitigation measures are required.

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

No Impact. The Project site is not identified as a locally-important mineral resource recovery site on any City plans.[43] Further, as discussed in the response to Question 11(a) above, no oil wells exist or are known to have previously existed on the Project site. Therefore, implementation of the Project would not result in the loss of availability of a locally-important mineral resource recovery site and no impact would occur. No mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project would not result in the loss of availability of a locally-important mineral resource recovery site. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. Implementation of the Project would not result in the loss of availability of a locally-important mineral resource recovery site. No impacts would occur and no mitigation measures are required.

12. NOISE

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted

[42] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Oil, Gas & Geothermal District Maps, District 1, Map No T03S R13W, website: http://www.conservation.ca.gov/dog/maps/Pages/GISMapping2.aspx, July 7, 2014.*

[43] *City of Compton General Plan, 1991.*

decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- **Leq** An Leq, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **Lmax** The maximum instantaneous noise level experienced during a given period of time.
- **Lmin** The minimum instantaneous noise level experienced during a given period of time.
- **CNEL** The Community Noise Equivalent Level is a 24-hour average Leq with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour Leq would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation,

including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that completely blocks the line-of-sight between the source and receptor reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[44]

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less-Than-Significant With Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Compton General Plan Noise Element and the City of Compton Noise Ordinance. As discussed previously, a noise level increase of 3 dBA is barely perceptible to most people, while a 5 dBA increase is readily noticeable and a difference of 10 dBA would be perceived as a doubling of loudness. Based on this information, the following thresholds would apply to the operational characteristics of the Proposed Project:

- A less than 3 dBA increase is not discernable and would not be considered a significant impact.
- A less than 5 dBA increase is noticeable, but would not be considered significant if total noise levels remain below the City's acceptable noise levels by land use. The acceptable noise levels are identified below, under the "City of Compton Noise Element" discussion.
- A 3 dBA or greater increase would be considered potentially significant if the total noise levels would meet or exceed the City's acceptable noise levels by land use
- A 5 dBA or greater increase is considered potentially significant

Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

City of Compton Noise Element

The former State Office of Noise Control has prepared Guidelines for the Preparation and Content of Noise Elements of General Plans that have subsequently been incorporated into the State's General Plan Guidelines. The City of Compton Noise Element applies these guidelines. Specifically, the City's Noise Element states that the following noise guidelines indicate the compatibility of noise-sensitive land uses in areas subject to ambient noise levels ranging between 55 CNEL and 80 CNEL.

- Residential uses are normally unacceptable in areas where the ambient noise levels exceed 70 dB CNEL; and residential uses are conditionally acceptable in areas where the ambient noise level ranges between 55-70 dB CNEL.
- Commercial/professional office buildings and land uses are normally unacceptable in areas where the ambient noise levels exceed 75 dB CNEL, and are conditionally acceptable within areas where the ambient noise levels range from 67 to 78 dB CNEL (for commercial/professional offices only).

[44] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

- Industrial uses are normally unacceptable in areas where the ambient noise levels exceed 80 dB CNEL; and are conditionally acceptable in areas where the ambient noise level ranges between 65-75 dB CNEL.
- Institutional land uses are normally unacceptable in areas where the ambient noise levels exceed 75 dB CNEL, and are conditionally acceptable within areas where the ambient noise levels range from 65 to 75 dB CNEL.
- Schools, libraries, hospitals, and nursing homes are treated as noise-sensitive land uses, requiring acoustical studies within areas exceeding 60 dB CNEL.

City of Compton Noise Control Ordinance

Chapter 7-12 of the City of Compton Municipal Code (CMC) regulates noise levels in the City by referencing the Los Angeles County Noise Control Ordinance. The CMC makes it unlawful for any person to make or cause any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area.

Existing Noise Conditions in Project Site Vicinity

Measured Ambient Noise Levels & Existing Sensitive Receptors

To identify the existing ambient noise levels in the general vicinity of the Project site, noise measurements were taken with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1. Additionally, this noise meter meets the requirement specified in CMC Section 7-12.2 that the instruments be "Type S-2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The nearest sensitive receptors that could potentially be subject to noise impacts associated with the construction and operation of the Proposed Project include residential uses, senior housing, and a religious institution (see Figure 16, Noise Monitoring and Sensitive Receptor Location Map). The distances of these sensitive receptors as measured from the Project Site boundary to nearest edge of receptor are noted below in Table 14, Distances to Nearest Sensitive Receptors. The closest schools to the Project site are the Community Lutheran Church Preschool, approximately 0.18 miles west of the Project site, and Centennial High School, approximately one-quarter mile north of the Project site. The measured noise levels are shown in Table 15, Existing Ambient Noise Levels in Project Site Vicinity.

Table 14
Distances to Nearest Sensitive Receptors

No.	Sensitive Receptor Location	Distance in Feet From Project Site Boundary
1	Residential uses to east across Central Ave.	110
2	Residential uses to north across Sam Littleton St.	40
3	Residential uses to west across McKinley Ave.	35
4	Residential uses to south across Rosecrans Ave.	140
5	Religious Institution south of Rosecrans Ave.	130
6	Senior Housing east and south of Project Site.	40
Note: See also Figure 16, Noise Monitoring and Sensitive Receptor Location Map *Source: Pomeroy Environmental Services, 2014..*		



Source: Pomeroy Environmental Services, July 2014.

EcoTierra consulting

Figure 16
Noise Sensitive Receptor Location Map

Table 15
Existing Ambient Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics (dBA) [a]		
			Leq	Lmin	Lmax
1	Southeast corner of S. Central Ave. and E. 139th St.	Traffic noise along S. Central Ave. and E. 139th St.; pedestrian activity. Hammering and tractor activity on the Project Site was barely perceptible.	69.0	54.4	78.7
2	Northwest corner of Sam Littleton St. and Corlett Ave.	Traffic noise along Sam Littleton and Corlett Ave; pedestrian activity.	64.5	47.5	80.0
3	Southwest corner of McKinley Ave. and E. 138th St.	Traffic and truck noise along McKinley Ave, 138th St. and E. 139th Street; pedestrian activity.	60.5	44.3	81.8
4	Northeast corner of Clymar Ave. and Aprilia Ave.	Traffic and pedestrian activity on Rosecrans Ave, Clymar Ave. and Aprilia Ave.	66.8	51.5	81.0

[a] Noise measurements were taken on May 7, 2014 at each location between 1:44 p.m. and 3:06 p.m for a duration of 15 minutes, consistent with CMC Section 7-12.2 and 7-12.4. See Appendix J to this IS/MND for noise data.
Source: Pomeroy Environmental Services, 2014.

Existing Off-Site Roadway Noise Levels

Existing roadway noise levels were calculated for 13 roadway segments located in proximity to the Project Site. The roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which, for the purpose of this analysis, include the roadways that are nearest to the Project Site and had the most project-generated trips. These roadways, when compared to roadways located farther away from the Project Site, would experience the greatest percentage increase in traffic generated by the Project.

Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the project traffic analysis. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along study area roadway segments are presented in Table 16, Existing (2014) Roadway Noise Levels. See Appendix J to this Draft IS/MND for more information related to the assumptions utilized in estimating the off-site roadway noise levels.

Table 16
Existing (2014) Roadway Noise Levels

Roadway	Roadway Segment	Land Uses Located Along Roadway Segment	dBA CNEL
Sam Littleton St.	West of McKinley Ave.	Residential	62.9
	Between McKinley Ave. & Corlett Ave.	Residential/Industrial	64.5
	Between Corlett Ave. & Central Ave.	Residential/Industrial	64.7
Rosecrans Ave.	West of Central Ave.	Residential/Industrial/Commercial	74.4
	West of Stanford Ave.	Residential/Industrial/Commercial	73.7
Central Ave.	North of Sam Littleton St.	Residential	73.7
	Between Sam Littleton St. & Rosecrans Ave.	Residential/Industrial/Commercial	70.8
	South of Rosecrans Ave.	Residential/Industrial/Commercial	73.0
McKinley Ave.	Between Sam Littleton St. & 137th St.	Residential/Industrial	54.2
	Between 139th St. & Rosecrans Ave.	Industrial	59.6
Avalon Blvd.	North of 135th St.	Residential/Commercial	72.2
	Between 135th St. & Rosecrans Ave.	Residential/Industrial/Commercial	71.7
	South of Rosecrans Ave.	Industrial/Commercial	71.7

Traffic data: Proposed Brickyard Commerce Center Traffic Impact Analysis Report, Hirsch/Green Transportation Consulting, Inc., 2014.
Noise level calculations are provided in Appendix J to this Draft IS/MND.
Source: Pomeroy Environmental Services, 2014.

Construction Noise Impacts

Construction noise in the City is regulated by Section 7-12.22 of the CMC (Construction or Repairing of Buildings, Pile Drivers, Hoists, Steam Shovels). Specifically, CMC states that no person shall cause or permit any work to be done or do any work on the erection (including excavation), unless the noise caused thereby is confined within a building, or use any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist, unless the noise caused thereby is confined within a building, other than between the hours of 7:00 a.m. and 7:00 p.m. on Monday through Saturday, except in cases of urgent necessity in the interest of public health and safety and then only with a permit from the Building Official. No such permit shall be granted for a period of more than three (3) days, but may be renewed from time to time so long as the emergency exists.

Construction of the Proposed Project would require the use of heavy equipment for grading and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. In addition, prior to the initiation of Project construction activity, interim demolition activities, debris hauling, and concrete and asphalt crushing would occur on the Project site. These activities would all have the potential to generate temporary increases in noise levels.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table 17, Noise Range of Typical Construction Equipment, and Table 18, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table 17
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table 18
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source:United States Environmental Protection17 Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The noise levels shown in Table 18 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table 18, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction

activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor. Thus, construction activities associated with the Proposed Project would be expected to generate noise levels consistent with these estimates at the noise-sensitive residential uses, the senior housing use and the religious institution identified previously in Table 14, Distances to Nearest Sensitive Receptors, and Figure 16, Noise Monitoring and Sensitive Receptor Location Map. It should be noted that sensitive receptors would experience the greatest noise level increase when heavy construction is occurring at or near the Project Site boundary, and off-site construction noise levels would be reduced as construction activities move toward the center of the Project Site. In addition, any increase in noise levels at off-site receptors during construction of the Proposed Project would be temporary and intermittent in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. Moreover, the construction noise during the heavier initial periods of construction (i.e., grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed buildings) as the physical structure of the proposed structures would break the line-of-sight noise transmission from the construction areas to the nearby sensitive receptors.

The City does not have specific limitation on construction noise levels. Instead, construction noise is regulated by limiting construction activity to the less noise sensitive daytime hours. The Noise Ordinance requires construction to be limited to between 7:00 a.m. and 7:00 p.m. Monday through Saturday. Thus, although construction activity would increase noise levels at the identified sensitive receptors, the proposed construction activity would occur within the time confines set forth within the Noise Ordinance and, thus, Project construction activity would be consistent with the standards established in the Noise Ordinance. In addition, the following best management practices have been identified as mitigation measures to ensure construction noise levels are reduced to the maximum extent feasible. Through compliance with the allowable time frames for construction activity set forth in the City's Noise Ordinance, and the implementation of Mitigation Measures NOI-1 through NOI-5, construction noise impacts would be less than significant.

Mitigation Measures

MM-NOI-1. *Construction activities shall be scheduled so as to operate only the necessary construction equipment at any given time, in order to control noise levels.*

MM-NOI-2. *The applicant or project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.*

MM-NOI-3. *Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling, staging) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, in order to minimize the propagation of noise from such activities towards these land uses.*

MM-NOI-4. *Solid barriers such as, but not limited to, plywood structures or flexible sound control curtains shall be erected around the western and northern perimeters of the construction site adjacent to residential neighborhoods to minimize the amount of noise during construction on the nearby noise-sensitive uses. Barriers shall be of sufficient height to block the line of sight between the Project site and the adjacent sensitive receptors and shall be capable of reducing noise levels between the source and the receptor by at least 5 dBA.*

MM-NOI-5. *The Project shall provide a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where*

violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed at all project site entrances in a location that is readily visible to the public. In addition, a notice containing this information shall be provided by mail to all residents located within 250 feet of the Project site. Complaints shall be responded to within a reasonable time frame (i.e., ordinarily within 24 hours; however, additional response time may be required for complex or other unusual circumstances).

Operational Noise

Off-Site Traffic Noise

The increase in traffic resulting from implementation of the Project would increase ambient noise levels at off-site locations in the Project vicinity. These concerns were addressed using the FHWA-RD-77-108 model, which calculates the noise level (CNEL) for a particular reference set of input conditions, based on site-specific traffic volumes, vehicle mix, distances, speeds and/or noise barriers. Based on the Traffic Study prepared for the Project (included as Appendix K to this Draft IS/MND) in combination with the research of the surrounding land uses, roadway noise levels were forecasted to determine if the Project's vehicular and truck traffic would result in a significant impact at off-site locations. Based on the distribution of traffic over time contained within the FHWA model, these calculations assumed automobile traffic would be distributed throughout a typical 24-hour period as follows: 77.7% during daytime hours (7am-7pm), 12.7% during evening hours (7pm-10pm) and 9.6% during nighttime hours (10pm-7am). Medium-duty trucks would be distributed throughout a typical 24-hour period as follows: 87.4% during the daytime hours, 5.1% during evening hours, and 7.5% during nighttime hours. Heavy-duty trucks would be distributed throughout a typical 24-hour period as follows: 89.1% during the daytime hours, 2.8% during evening hours, and 8.1% during nighttime hours. See also Appendix K to this Draft IS/MND for more information related to the assumptions utilized in this analysis.

Off-site locations in the Project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the proposed Project. The increases in noise levels at selected roadway segments located in close proximity to the Project Site are identified in Table ~~18~~19, Off-Site Roadway Noise Levels – Site Plan A, and Table ~~19~~20, Off-Site Roadway Noise Levels – Site Plan B. This analysis identifies the changes in future noise levels along the study-area roadway segments for the following scenarios: Existing (2014), Existing With Project (2014) conditions, Future Without Project (2017), and Future With Project (2017). The results shown in Tables 19 and 20 were based on faulty traffic data and have been revised in the Final IS to reflect the correct traffic data for McKinley Avenue (i.e., the most impacted roadway segments). As shown in Table ~~18~~19, the Project Site Plan A would increase local noise levels by a maximum of 1.5 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue~~the Project Site Plan A would increase local noise levels by a maximum of 1.5 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue~~. As shown in Table 20~~6~~, the Project Site Plan B would increase local noise levels by a maximum of 1.6 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue. These increases would result in CNELs of 61.1 dBA for Site Plan A and 61.2 dBA on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. These noise levels would fall within the City's acceptable noise levels by land use for residential, commercial, industrial, and institutional land uses. As described previously, a less than 5 dBA increase is noticeable, but would not be considered significant if total noise levels remain below the City's acceptable noise levels by land use. As such, these increases would be below the 5 dBA threshold and, therefore, project-related traffic noise impacts would be less than significant.~~the Project Site Plan B would increase local noise levels by a maximum of 1.6 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue. Because~~

~~the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the proposed Project would be less than the 3 dBA CNEL thresholds described previously, impacts for all scenarios would be less than significant. In addition, as the other roadway segments that are located even farther away from the Project Site would experience less traffic increases due to the Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant~~.

As shown in Tables 19 and 20, the Project, in conjunction with traffic generated by related projects and other cumulative growth, would result in cumulative traffic noise increases over existing conditions. The largest cumulative increase, under both Site Plan A and Site Plan B, would occur on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. The cumulative increase would be 3.9 dBA CNEL under Site Plan A and 4.0 dBA CNEL under Site Plan B. These cumulative increases would result in future CNELs of 63.5 dBA for Site Plan A and 63.6 dBA on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. These noise levels would fall within the City's acceptable noise levels by land use for residential, commercial, industrial, and institutional land uses. As described previously, a less than 5 dBA increase is noticeable, but would not be considered significant if total noise levels remain below the City's acceptable noise levels by land use. As such, these increases would be below the 5 dBA threshold and, therefore, cumulative traffic noise impacts would be less than significant.

In addition to these modeled estimates for Project-related vehicular and truck traffic noise levels, the following supplemental information has been provided for potential truck-related noise impacts along McKinley Avenue between 137th Street and Rosecrans Avenue. Based on a review of a noise impact analysis conducted in 2013 for a warehousing and distribution center project nearly twice the size of the Proposed Project (with 24-hour operations),, an average noise level of 64.9 dBA CNEL was measured at a primary driveway location for an existing large distribution center for Target[45] (see Appendix J to this Draft IS/MND for the measurement data and more information related to this reference noise level). A 64.9 dBA CNEL is slightly higher than the modeled noise estimates presented in Tables 19 and 20 for McKinley Avenue. However, these noise levels would fall within the conditionally acceptable noise level range of 55-70 dB CNEL for residential uses. Thus, because the measured reference noise level for truck traffic associated with a large distribution center and the modeled vehicular and truck noise levels for the Project's Site Plan A and Site Plan B are consistent with the established City and County noise standards for residential uses, off-site noise impacts from Project-related vehicular and truck traffic along McKinley Avenue would be less than significant.

On-Site Trucking, Warehousing, and Distribution Noise

The Project would generate on-site noise related to idling trucks, delivery truck activities, unloading/loading of goods, automobile and truck parking, backup alarms and any refrigerated containers. Although these would be new sources of on-site noise, it should be noted that the Project would not involve the long-term use of heavy on-site equipment which is more typical for large manufacturing operations similar to the previous historical uses of the Project Site (e.g., clay mining and brick manufacturing, concrete batching, concrete/brick/asphalt crushing, and reverse mining). Thus, while the Project would introduce new types of noise sources related to warehousing and distribution activities, the proposed on-site operations could actually produce lower noise levels compared to historical uses of the Project Site. Nevertheless, the following noise analysis has been provided related to on-site warehousing and distribution activities.

[45] *Target Import Warehouse located at 3110 Alder Avenue, Rialto CA 92377. Based on a review of aerial photography, the noise survey area included more than approximately three million square feet of warehouse/commercial uses on site that is more than 200 acres in area.*

Based on a review of a noise impact analysis conducted in 2013 for a warehousing and distribution center project, with similar operations as the Project, at a distance of 25 feet from an existing Veg Fresh Farms and FedEx distribution facility, daytime noise levels were measured at 68.3 dBA Leq and nighttime noise levels were measured at 70.1 dBA Leq (see Appendix J to this Draft IS/MND for more information related to these noise reference levels). Based on a review of Site Plan A, Site Plan B, and the location of the adjacent land uses, the distance between the proposed on-site truck loading/unloading areas and the nearest adjacent sensitive receptor would be approximately 76 feet under Site Plan B (residences to the west on McKinley Avenue). Based on this distance and the reference noise levels identified above, unmitigated maximum daytime noise levels would be approximately 65.3 dBA Leq, and unmitigated maximum nighttime noise levels would be approximately 68.1 dBA Leq. In addition, it should be noted that both Site Plan A and Site Plan B include 12-foot high concrete screenwalls with vegetation along all heavy on-site trucking areas that front adjacent off-site sensitive receptors (e.g., residences along McKinley and Central Avenue, and senior housing to the east of the flag lot). And, both Site Plan A and Site Plan B would include an 8-foot high picket fence around all remaining external property line boundaries. Based on a review of Table 4 of the FHWA Noise Barrier Design Handbook,[46] the design feasibility of a sound barrier that reduces noise by 5 dBA is considered "simple" and a reduction of up to 10 dBA as "attainable." And, reductions of 15 and 20 dBA are considered "very difficult" and "nearly impossible," respectively. Based on this information, the proposed screenwalls would be feasibly required to achieve a 10 dBA reduction for off-site noise levels by Mitigation Measure MM NOI-6.. Based on this attenuation, mitigated maximum daytime noise levels at the nearest sensitive receptor would be approximately 55.3 dBA Leq, and mitigated maximum nighttime noise levels would be approximately 58.1 dBA Leq. Based on these averages, mitigated CNEL at the nearest off-site noise receptors would be approximately 64.5 dBA.[47] These noise levels would fall within the City Noise Element range of acceptable exterior noise levels for residential, commercial and industrial land uses. Therefore, noise impacts with respect to on-site trucking, warehousing, and distribution activities would be less than significant.

On-Site Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed buildings at the Project Site. The design and operation of this equipment would be required to comply with CMC Section 7-12.11 (Machinery, Equipment, Fans and Air Conditioning) which states that it shall be unlawful for any person to operate any machinery, equipment, pump, fan, air conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at any adjacent property line to exceed the ambient noise level by more than five decibels. On-site mechanical HVAC equipment would be installed on the rooftops of the proposed buildings and would be out of the line-of-sight from off-site sensitive receptors. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

MM-NOI-6. *The 12-foot high screenwalls provided along McKinley Avenue and Sam Littleton Street shall be designed and constructed to reduce noise levels across the barrier by at least 10 dBA The design of the walls shall be reviewed by the City of Compton Building Department to verify this level of sound reduction.*

---

[46] *FHWA Noise Barrier Design Handbook; webpage updated July 14, 2011; accessed July 22, 2014. http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm.*

[47] *Calculation provided in Appendix J to this Draft IS/MND.*

Table 19
Off-Site Roadway Noise Levels – Site Plan A

Roadway	Roadway Segment	Existing Land Uses Located Along Roadway Segment	dBA CNEL						
			Existing (2014) [1]	Existing With Project (2014) [2]	*Net Increase [2]-[1]*	Future Without Project (2017) [3]	Future With Project (2017) [4]	*Net Increase [4]-[3]*	*Cumulative Increase [4]-[1]*
Sam Littleton St.	West of McKinley Ave.	Residential	62.9	62.9	***0.0***	63.1	63.2	***0.1***	***0.3***
	Between McKinley Ave. & Corlett Ave.	Residential/Industrial	64.5	64.6	***0.1***	64.7	64.8	***0.1***	***0.3***
	Between Corlett Ave. & Central Ave.	Residential/Industrial	64.7	64.8	***0.1***	64.9	65.0	***0.1***	***0.3***
Rosecrans Ave.	West of Central Ave.	Residential/Industrial/ Commercial	74.4	74.5	***0.1***	74.7	74.7	***0.0***	***0.3***
	West of Stanford Ave.	Residential/Industrial/ Commercial	73.7	73.9	***0.2***	74.0	74.1	***0.1***	***0.4***
Central Ave.	North of Sam Littleton St.	Residential	73.7	73.7	***0.0***	73.9	73.9	***0.0***	***0.2***
	Between Sam Littleton St. & Rosecrans Ave.	Residential/Industrial/ Commercial	70.8	71.0	***0.2***	71.2	71.2	***0.0***	***0.4***
	South of Rosecrans Ave.	Residential/Industrial/ Commercial	73.0	73.1	***0.1***	73.1	73.3	***0.2***	***0.3***
McKinley Ave.	Between Sam Littleton St. & 137th St.	Residential/Industrial	54.2	54.2	***0.0***	~~54.8~~55.8	~~54.8~~55.8	***0.0***	***~~0.6~~1.6***
	Between 139th St. & Rosecrans Ave.	Industrial	59.6	61.1	***1.5***	~~60.6~~62.7	~~61.8~~63.5	***~~1.2~~0.8***	***~~2.2~~3.9***
Avalon Blvd.	North of 135th St.	Residential/Commercial	72.2	72.3	***0.1***	72.5	72.5	***0.0***	***0.5***
	Between 135th St. & Rosecrans Ave.	Residential/Industrial/ Commercial	71.7	71.8	***0.1***	71.9	71.9	***0.0***	***0.2***
	South of Rosecrans Ave.	Industrial/Commercial	71.7	71.7	***0.0***	71.9	71.9	***0.0***	***0.2***

Traffic data: Proposed Brickyard Commerce Center Traffic Impact Analysis Report, Hirsch/Green Transportation Consulting, Inc., 2014.
Noise data provided in Appendix J to this Draft IS/MND.
Source: Pomeroy Environmental Services, 2014.

Table 20
Off-Site Roadway Noise Levels – Site Plan B

Roadway	Roadway Segment	Existing Land Uses Located Along Roadway Segment	dBA CNEL						
			Existing (2014) [1]	Existing With Project (2014) [2]	*Project Net Increase [2]-[1]*	Future Without Project (2017) [3]	Future With Project (2017) [4]	*Project Net Increase [4]-[3]*	*Cumulative Increase [4]-[1]*
Sam Littleton St.	West of McKinley Ave.	Residential	62.9	63.0	***0.1***	63.1	63.2	***0.1***	***0.3***
	Between McKinley Ave. & Corlett Ave.	Residential/Industrial	64.5	64.7	***0.2***	64.7	64.9	***0.2***	***0.4***
	Between Corlett Ave. & Central Ave.	Residential/Industrial	64.7	65.0	***0.3***	64.9	65.2	***0.3***	***0.5***
Rosecrans Ave.	West of Central Ave.	Residential/Industrial/ Commercial	74.4	74.5	***0.1***	74.7	74.7	***0.0***	***0.3***
	West of Stanford Ave.	Residential/Industrial/ Commercial	73.7	73.8	***0.1***	74.0	74.1	***0.1***	***0.4***
Central Ave.	North of Sam Littleton St.	Residential	73.7	73.7	***0.0***	73.9	73.9	***0.0***	***0.2***
	Between Sam Littleton St. & Rosecrans Ave.	Residential/Industrial/ Commercial	70.8	70.8	***0.0***	71.2	71.2	***0.0***	***0.4***
	South of Rosecrans Ave.	Residential/Industrial/ Commercial	73.0	73.0	***0.0***	73.1	73.2	***0.1***	***0.2***
McKinley Ave.	Between Sam Littleton St. & 137th St.	Residential/Industrial	54.2	54.2	***0.0***	~~54.8~~55.8	~~54.8~~56.7	***~~0.0~~0.9***	***~~0.6~~2.5***
	Between 139th St. & Rosecrans Ave.	Industrial	59.6	61.2	***1.6***	~~60.6~~62.7	~~61.9~~63.6	***~~1.3~~0.9***	***~~2.3~~4.0***
Avalon Blvd.	North of 135th St.	Residential/Commercial	72.2	72.3	***0.1***	72.5	72.5	***0.0***	***0.3***
	Between 135th St. & Rosecrans Ave.	Residential/Industrial/ Commercial	71.7	71.7	***0.0***	71.9	71.9	***0.0***	***0.2***
	South of Rosecrans Ave.	Industrial/Commercial	71.7	71.7	***0.0***	71.9	71.9	***0.0***	***0.2***

Traffic data: Proposed Brickyard Commerce Center Traffic Impact Analysis Report, Hirsch/Green Transportation Consulting, Inc., 2014.
Noise data provided in Appendix J to this Draft IS/MND.
Source: Pomeroy Environmental Services, 2014.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. The existing regulatory environment (City of Compton Noise Element, City of Compton Noise Control Ordinance) would be the same for the Revised Site Plan A Project as for Site Plan A and Site Plan B. Existing measured ambient noise levels, sensitive receptors, and roadway noise levels would be the same as for Site Plan A and Site Plan B.

Construction Noise

Construction activities under the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B projects. Through compliance with the allowable time frames for construction activity set forth in the City's Noise Ordinance, and the implementation of Mitigation Measures NOI-1 through NOI-5, construction noise impacts would be less than significant.

Operational Noise

Off-site locations in the vicinity of the Revised Site Plan A project would experience a slight increase in noise resulting from the additional traffic generated by the Revised Site Plan A Project. The increase in noise levels would be lower than would occur under the Site Plan A Project. The increases in noise levels at selected roadway segments located in close proximity to the Project Site are identified in Table 19a, Off-Site Roadway Noise Levels – Revised Site Plan A. As shown in Table 19a, the Revised Site Plan A Project would increase local noise levels by a maximum of 1.2 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue. Because the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the Revised Site Plan A Project would be less than the 3 dBA CNEL thresholds, impacts would be less than significant. In addition, as the other roadway segments that are located even farther away from the Project Site would experience less traffic increases due to the Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant.

Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. Operational truck-related off-site noise impacts and on-site trucking, warehousing and distribution noise impacts, and on-site stationary source noise impacts would be similar to the Project. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. The existing regulatory environment (City of Compton Noise Element, City of Compton Noise Control Ordinance) would be the same for the Revised Site Plan B Project as for Site Plan A and Site Plan B. Existing measured ambient noise levels, sensitive receptors, and roadway noise levels would be the same as for Site Plan A and Site Plan B.

Construction Noise

Construction activities under the Revised Site Plan B Project would be similar to the Site Plan A and Site Plan B projects. Through compliance with the allowable time frames for construction activity set forth in the City's Noise Ordinance, and the implementation of Mitigation Measures NOI-1 through NOI-5, construction noise impacts would be less than significant.

Operational Noise

Off-site locations in the vicinity of the Revised Site Plan B project would experience a slight increase in noise resulting from the additional traffic generated by the Revised Site Plan B

Project. The increase in traffic noise levels under Revised Site Plan B would be slightly higher than under Site Plan B, but less than under the Site Plan A Project. The increases in noise levels at selected roadway segments located in close proximity to the Project Site are identified in Table 20b, Off-Site Roadway Noise Levels – Revised Site Plan B. As shown in Table 20b, the Revised Site Plan B Project would increase local noise levels by a maximum of 1.7 dBA CNEL during the Existing With Project (2014) scenario for the roadway segment of McKinley Avenue between 139th Street and Rosecrans Avenue. Because the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the Revised Site Plan B Project would be less than the 3 dBA CNEL thresholds, impacts would be less than significant. In addition, as the other roadway segments that are located even farther away from the Project Site would experience less traffic increases due to the Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant

Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. Operational truck-related off-site noise impacts and on-site trucking, warehousing and distribution noise impacts, and on-site stationary source noise impacts would be similar to the Project. Impacts would be less than significant and no mitigation measures are required.

Table 19a
Off-Site Roadway Noise Levels – Revised Site Plan A

Roadway	Roadway Segment	Existing Land Uses Located Along Roadway Segment	dBA CNEL						
			Existing (2014) [1]	Existing With Project (2014) [2]	*Net Increase [2]-[1]*	Future Without Project (2017) [3]	Future With Project (2017) [4]	*Net Increase [4]-[3]*	*Cumulative Increase [4]-[1]*
Sam Littleton St.	West of McKinley Ave.	Residential	62.9	62.9	***0.0***	63.2	63.2	***0.0***	***0.3***
	Between McKinley Ave. & Corlett Ave.	Residential/Industrial	64.5	64.6	***0.1***	64.9	64.9	***0.0***	***0.4***
	Between Corlett Ave. & Central Ave.	Residential/Industrial	64.7	64.8	***0.1***	65.0	65.1	***0.1***	***0.4***
Rosecrans Ave.	West of Central Ave.	Residential/Industrial/ Commercial	74.4	74.5	***0.1***	74.7	74.9	***0.2***	***0.5***
	West of Stanford Ave.	Residential/Industrial/ Commercial	73.7	73.8	***0.1***	74.1	74.2	***0.1***	***0.5***
Central Ave.	North of Sam Littleton St.	Residential	73.7	73.7	***0.0***	73.9	73.9	***0.0***	***0.2***
	Between Sam Littleton St. & Rosecrans Ave.	Residential/Industrial/ Commercial	70.8	70.9	***0.1***	71.2	71.2	***0.0***	***0.4***
	South of Rosecrans Ave.	Residential/Industrial/ Commercial	73.0	73.0	***0.0***	73.2	73.3	***0.1***	***0.3***
McKinley Ave.	Between Sam Littleton St. & 137th St.	Residential/Industrial	54.2	54.2	***0.0***	55.8	55.8	***0.0***	***1.6***
	Between 139th St. & Rosecrans Ave.	Industrial	59.6	60.8	***1.2***	62.7	63.4	***0.7***	***3.8***
Avalon Blvd.	North of 135th St.	Residential/Commercial	72.2	72.3	***0.1***	72.5	72.5	***0.0***	***0.3***
	Between 135th St. & Rosecrans Ave.	Residential/Industrial/ Commercial	71.7	71.7	***0.0***	71.9	71.9	***0.0***	***0.2***
	South of Rosecrans Ave.	Industrial/Commercial	71.7	71.7	***0.0***	71.9	72.0	***0.1***	***0.3***

Traffic data: Proposed Brickyard Commerce Center Traffic Impact Analysis Report, Revised MND Projects, Hirsch/Green Transportation Consulting, Inc., December 2014.
Noise data provided in Appendix J-2 to this Draft IS/MND.
Source: Pomeroy Environmental Services, 2015.

Table 20b
Off-Site Roadway Noise Levels – Revised Site Plan B

Roadway	Roadway Segment	Existing Land Uses Located Along Roadway Segment	dBA CNEL						
			Existing (2014) [1]	Existing With Project (2014) [2]	*Project Net Increase [2]-[1]*	Future Without Project (2017) [3]	Future With Project (2017) [4]	*Project Net Increase [4]-[3]*	*Cumulative Increase [4]-[1]*
Sam Littleton St.	West of McKinley Ave.	Residential	62.9	63.0	***0.1***	63.2	63.3	***0.1***	***0.4***
	Between McKinley Ave. & Corlett Ave.	Residential/Industrial	64.5	65.0	***0.5***	64.9	65.3	***0.4***	***0.8***
	Between Corlett Ave. & Central Ave.	Residential/Industrial	64.7	65.3	***0.6***	65.0	65.6	***0.6***	***0.9***
Rosecrans Ave.	West of Central Ave.	Residential/Industrial/ Commercial	74.4	74.4	***0.0***	74.7	74.9	***0.2***	***0.5***
	West of Stanford Ave.	Residential/Industrial/ Commercial	73.7	73.8	***0.1***	74.1	74.2	***0.1***	***0.5***
Central Ave.	North of Sam Littleton St.	Residential	73.7	73.7	***0.0***	73.9	73.9	***0.0***	***0.2***
	Between Sam Littleton St. & Rosecrans Ave.	Residential/Industrial/ Commercial	70.8	70.8	***0.0***	71.2	71.2	***0.0***	***0.4***
	South of Rosecrans Ave.	Residential/Industrial/ Commercial	73.0	73.0	***0.0***	73.2	73.3	***0.1***	***0.3***
McKinley Ave.	Between Sam Littleton St. & 137th St.	Residential/Industrial	54.2	55.5	***1.3***	55.8	56.7	***0.9***	***2.5***
	Between 139th St. & Rosecrans Ave.	Industrial	59.6	61.3	***1.7***	62.7	63.7	***1.0***	***4.1***
Avalon Blvd.	North of 135th St.	Residential/Commercial	72.2	72.3	***0.1***	72.5	72.5	***0.0***	***0.3***
	Between 135th St. & Rosecrans Ave.	Residential/Industrial/ Commercial	71.7	71.7	***0.0***	71.9	71.9	***0.0***	***0.2***
	South of Rosecrans Ave.	Industrial/Commercial	71.7	71.7	***0.0***	71.9	72.0	***0.0***	***0.3***

Traffic data: Proposed Brickyard Commerce Center Traffic Impact Analysis Report, Revised MND Projects, Hirsch/Green Transportation Consulting, Inc., December 2014.
Noise data provided in Appendix J to this Draft IS/MND.
Source: Pomeroy Environmental Services, 2015.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less-Than-Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Impacts

Construction activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the Proposed Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, this analysis utilizes the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[48]

[48] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.*

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In addition, the City has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table 21, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 21
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration impacts upon existing off-site structures, there are no historical buildings or buildings that are extremely susceptible to vibration damage within 25 feet of proposed heavy construction activity. As shown in Table 20 above, at distances beyond 25 feet from the Project Site boundary, construction related vibration levels would not have the potential to exceed 0.089 PPV. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage, and the least restrictive threshold is 0.5 PPV at any building that is constructed with reinforced-concrete, steel, or timber. As maximum off-site vibration levels at existing structures would not have the potential to exceed 0.089 PPV, the Project's construction activities would not exceed the identified thresholds of significance for building damage from

vibration. As such, impacts with respect to building damage upon off-site structures would be less than significant.

In terms of human annoyance resulting from vibration generated during construction, the previously identified sensitive residential uses, senior housing use, and religious institution would all be located more than 50 feet from the heavy construction equipment identified in Table 20. As shown in Table 20 above, at distances of 50 feet construction related vibration levels would not have the potential to exceed 78 VdB. These vibration levels would not exceed the 80 VdB threshold for residences or buildings where people sleep, nor would vibration levels exceed the 83 VdB threshold for institutional buildings, which includes schools and churches. As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.

Operational Vibration Impacts

The Proposed Project consists of the development of a warehousing/light industrial center. Groundborne vibration at the Project Site and immediate vicinity currently results from heavy-duty vehicular travel (e.g., light, medium and heavy trucks, refuse trucks, and transit buses) on the nearby local roadways, and the operations associated with several adjacent industrial and manufacturing facilities. Although the Project would generate an increase in daily vehicular and truck traffic, the Project would not involve the long-term use of heavy on-site equipment that could result in high vibration levels, which are more typical for large manufacturing operations similar to the previous historical uses of the Project Site (e.g., clay mining and brick manufacturing, concrete batching, concrete/brick/asphalt crushing, and reverse mining). Thus, while the Project would increase roadway vehicular and truck traffic, on-site operations would likely produce less vibration than historical uses of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant and no mitigation measures are required.

Revised Site Plan A

Construction Vibration

Less-Than-Significant Impact. Construction activities under the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B projects. The Project's construction activities would not exceed the identified thresholds of significance for building damage from vibration. Impacts with respect to building damage upon off-site structures would be less than significant. Vibration levels would not exceed the 80 VdB threshold for residences or buildings where people sleep, nor would vibration levels exceed the 83 VdB threshold for institutional buildings, which includes schools and churches. As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.

Operational Vibration

Less-Than-Significant Impact. Operational characteristics of the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B projects. While the Project would increase roadway vehicular and truck traffic (although to a lesser extent than the Site Plan A Project), on-site operations would likely produce less vibration than historical uses of the Project Site. Vibration impacts associated with operation of the Revised Site Plan A Project would be less than significant and no mitigation measures are required.

Revised Site Plan B

Construction Vibration

Less-Than-Significant Impact. Construction activities under the Revised Site Plan B Project would be similar to the Site Plan A and Site Plan B projects. The Project's construction activities would not exceed the identified thresholds of significance for building damage from vibration. Impacts with respect to building damage upon off-site structures would be less than significant. Vibration levels would not exceed the 80 VdB threshold for residences or buildings where people sleep, nor would vibration levels exceed the 83 VdB threshold for institutional buildings, which includes schools and churches. As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.

Operational Vibration

Less-Than-Significant Impact. Operational characteristics of the Revised Site Plan B Project would be similar to the Site Plan A and Site Plan B projects. While the Project would increase roadway vehicular and truck traffic (slightly higher than the Site Plan B Project, but lower than the Site Plan A Project), on-site operations would likely produce less vibration than historical uses of the Project Site. Vibration impacts associated with operation of the Revised Site Plan B Project would be less than significant and no mitigation measures are required.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less-Than-Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As discussed in Checklist Question 12(a) above, the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, this impact would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Operational characteristics of the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B projects. As discussed under 12(a) above,, the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project that would exceed the applicable significance threshold. This impact would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operational characteristics of the Revised Site Plan B Project would be similar to the Site Plan A and Site Plan B projects. The Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project that would exceed the applicable significance threshold. This impact would be less than significant and no mitigation measures are required

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less-Than-Significant Impact. As discussed in Checklist Question 12(a) above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration. In addition, Mitigation Measures NOI-1 through NOI-5 have been identified as best management practices to ensure temporary construction noise levels are reduced to the maximum extent feasible. As such, these impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Construction activities and operational characteristics of the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B projects. Impacts would be less than significant for construction noise and vibration, and operational noise and vibration. Mitigation Measures NOI-1 through NOI-5 have been identified as best management practices to ensure temporary construction noise levels are reduced to the maximum extent feasible. This impact would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Construction activities and operational characteristics of the Revised Site Plan B Project would be similar to the Site Plan A and Site Plan B projects. Impacts would be less than significant for construction noise and vibration, and operational noise and vibration. Mitigation Measures NOI-1 through NOI-5 have been identified as best management practices to ensure temporary construction noise levels are reduced to the maximum extent feasible. This impact would be less than significant and no mitigation measures are required.

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

No Impact. The Project Site is located approximately 1.0 mile northwest of the Compton/Woodley Airport. The Project Site is not located within the 65 dBA CNEL airport contour.[49] Thus, the Project would not expose people residing or working in the project area to excessive noise levels related to the operation of a public airport. Therefore, no impact related to public airport noise exposure would occur.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not

[49] *Los Angeles County Airport Land Use Commission, Compton Airport Influence Area, May 13, 2003.*

include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

13. POPULATION AND HOUSING

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

Less-Than-Significant Impact. The Project does not include any residential land uses and, therefore, would not result in a direct population increase from construction of new homes. Further, the Project does not include the extension of roads or other infrastructure into otherwise unserved areas. Initially, the Project would likely accommodate existing employees from the region in the new facilities. A Local Hiring Program would be a public benefit provided by the Project through the Development Agreement to promote the hiring of Compton residents. Nevertheless, in order to provide a conservative assessment, the analysis provided below assumes that all of the new employees associated with the Project would be new employees moving to the region and would result in an indirect population increase in the City.

As part of its comprehensive planning process for the Southern California region, the Southern California Association of Governments (SCAG) divided its planning jurisdiction into 14 subregional organizations. The Project site is located within the City of Compton, which is part of the South Bay Cities Council of Governments subregion. According to SCAG projections prepared for the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City of Compton provided employment for 30,600 persons in 2008. SCAG projects that the City will provide employment for 31,200 persons, an increase of 1.9 percent, by 2020, and 32,200

persons, an increase of 5.2 percent by 2035.[50] Although future tenants of the Project are not known, it is estimated that the Project would accommodate 500-600 employment opportunities within the proposed development. This increase in employees would represent the majority of the employment growth for the City of Compton forecasted by SCAG in both 2020 and 2035. However, the City of Compton has experienced minimal job growth in recent years. Further, the Project site represents the largest single development site that is available within the City and, accordingly, would be expected to generate the majority of new jobs within the City during the 2020-2035 time frame. Thus, this level of employment growth would be within SCAG's employment forecast. Impacts would be less than significant and no mitigation measures are required.

The SCAG RTP/SCS forecast also identified population of the City of Compton of 95,900 persons in 2008, increasing to 96,900 persons in 2020, and 97,600 in 2035. Conservatively assuming that all 600 new employees associated with the Project were to become new Compton residents, the projected population growth would be consistent with the SCAG adopted forecasts, particularly considering that the Project would represent the majority of employment growth within the City during this time frame. Accordingly, the induced population growth associated with the Project would be within the SCAG's population forecast. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The employment growth associated with the Project would be within SCAG's employment forecast. Induced population growth associated with the Project would be within the SCAG's population forecast. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The employment growth associated with the Project would be within SCAG's employment forecast. Induced population growth associated with the Project would be within the SCAG's population forecast. Impacts would be less than significant and no mitigation measures are required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. There are no existing residential uses on the Project site. Therefore, no housing would be displaced by development of the Project. No impact is anticipated and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. No housing would be displaced by development of the Project. No impact is anticipated and no mitigation measures are required.

[50] *SCAG, RTP/SCS Forecast, website: http://www.scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf, July 1, 2014.*

Revised Site Plan B

No Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. No housing would be displaced by development of the Project. No impact is anticipated and no mitigation measures are required.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As discussed in the response to Question 13(b) above, there are currently no residential uses on the Project site. No persons would be displaced as a result of implementation of the Project. No impact is anticipated and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. No persons would be displaced as a result of implementation of the Project. No impact is anticipated and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. No persons would be displaced as a result of implementation of the Project. No impact is anticipated and no mitigation measures are required.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less-Than-Significant Impact. Fire-protection and emergency medical services at the Project site are provided by the CFD. The CFD has 84 sworn employees and five civilian employees. Its resources include four fire stations and nine front-line emergency vehicles comprised of four fire engines, one truck, two paramedic squads, and two basic life support transport ambulances. The Project would be served by Fire Station 3, located at 1133 West Rosecrans Avenue, approximately 0.8 miles southeast of the Project site. In addition to support from other CFD stations, the CFD has mutual aid agreements with the Cities of fire departments in Vernon, Downey, Santa Fe Springs and Montebello.[51] There are no known existing deficiencies in the fire protection services that are provided in this area of the City.

The Project would result in up to 1.5 million square feet of development on the Project site. By increasing the level of activity on the Project site, along with the number of employees and

[51] *City of Compton website: http://www.comptoncity.org/index.php/Fire-Department/emergency-response-services.htm, July 1, 2014.*

visitors, and increased trucking activity, the Project could potentially increase demand on CFD fire-protection and emergency medical services. The Project would comply with all applicable CFD and CMC fire-safety regulations, as well as those established by the California Fire Code, as adopted by the CMC, including those related to fire-protection systems (e.g., automatic sprinkler systems, life-safety alarm systems). Adherence to these regulations is anticipated to reduce the increase in demand for fire-protection services to levels where additional staff would not be required to accommodate the additional demand. Further, emergency access to the Project site would be provided from access points on Central Avenue, McKinley Avenue and Rosecrans Avenue. Implementation of the Project is not anticipated to increase response times to the Project site or surrounding vicinity. As discussed below in the response to Question 16(a), the Project would not result in any Project-related significant unavoidable impacts at any of the signalized study intersections. Lastly, the CFD has reviewed the preliminary site plans and the proposed project would be required to undergo a separate plan check process with CFD before the issuance of building permits. The CFD review will ensure adequate emergency access, fire hydrant availability, fire flow pressure, and compliance with all applicable codes. Thus, the Project would result in a less than significant impact with regard to fire-protection services. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The Project would result in a less than significant impact with regard to fire-protection services. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The Project would result in a less than significant impact with regard to fire-protection services. Impacts would be less than significant and no mitigation measures are required.

b) Police protection?

Less-Than-Significant With Mitigation Incorporated. Police protection is provided to the Project site and the surrounding area by the Los Angeles County Sheriff's Department (LASD). The project site would be served by the LASD Compton Sheriff's Station located at 301 South Willowbrook Avenue, approximately 2.4 miles northwest of the Project site, and is within the LASD Personnel as Reporting District 2810. The area is bordered by North Central Avenue to the east, West Rosecrans Avenue to the south, McKinley Avenue to the west with the southern portion that extends west on 139th Street to Stanford Avenue, and 132nd Street to the north.

Average response times for emergency calls in the City of Compton are approximately 3.8 minutes for an emergency response, 7.0 minutes for priority response, and 34.5 minutes for a non-emergency response.[52] The Compton Station considers the response times for the City of Compton acceptable.[53] Furthermore, as discussed in Section 16 (Transportation/Traffic), based on the City of Compton's established methodology and significance thresholds, the Project is not

[52] *Written Correspondence with Captain Leonard McCray, Los Angeles County Sherriff's Department, dated August 29, 2014.*

[53] *Ibid.*

anticipated create a significant impact with regards to vehicle/capacity ratios and the level of service of roadways in the Project vicinity. As previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the LASD would use to access the Project site when responding to an emergency call. Response times would not be greatly affected as emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, Project impacts related to response times would be less than significant.

Implementation of the Project could result in a net increase of approximately 500-600 employment opportunities within the City, thereby generating a potential increase in the number of service calls from the Project site. The City of Compton had approximately 3,810 crimes in 2013, with predominant crimes being larceny theft, aggravated assault, and grand theft auto.[54] Therefore, the crime rate in the City of Compton in 2013 was approximately 39 crimes per 1,000 persons.[55,56] The Project would be designed to deter crime by limiting on-site "dead zone" spaces. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and on-site security service. Further, access to the Project site would be controlled and would be provided through gated entrances on McKinley Avenue and Central Avenue. There would also be a controlled entry gate from Rosecrans Avenue to Building A-2/Building B-3. Implementation of the Project is not anticipated to increase response times to the Project site or surrounding vicinity. As discussed below in the response to Question 16(a), the Project would not result in significant unavoidable impacts on any of the signalized study intersections. Lastly, LASD will be provided an opportunity to review and comment on all project development plans before the issuance of building permits. The LASD review will ensure adequate design features are included to reduce any potential increase in demand for police-protection services. No new or expanded police station facilities would be required as a result of the Project. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. No new or expanded police station facilities would be required as a result of the Project. The Project would result in a less than significant impact with regard to police protection services. Impacts would be less than significant with implementation of Mitigation Measure PS-1.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. No new or expanded police station facilities would be required as a result of the Project. The Project would result in a less than significant impact with regard to police protection services. Impacts would be less than significant with implementation of Mitigation Measure PS-1.

---

54 *Written Correspondence with Captain Leonard McCray, Los Angeles County Sherriff's Department, dated August 29, 2014.*

55 *United States Census, City of Compton website, Quick Facts: http://quickfacts.census.gov/qfd/states/06/0615044.html, September 4, 2014.*

56 *[(3,810 crimes) ÷ (97,877 residents) x (1,000)]= 39 crimes per 1,000 persons.*

MM PS-1. *Before building permits are issued, the applicant shall consult with LASD on design features and security plans that would potentially minimize increased demand for police protection services.*

c) Schools?

Less-Than-Significant With Mitigation Incorporated. The Project site is located within the Compton Unified School District (CUSD). In general, the demand for school services is the result of an area's residential population. The Project site currently does not contain any residential units. Similarly, the Project does not include residential units and would not generate any additional permanent residents, which directly generate school-aged children and a demand for school services. Industrial uses under the Project could indirectly result in a minor increase in enrollment at CUSD schools. As shown in Table 22, Estimated Proposed Project Student Generation, based on the square footage of the Project, up to 56 new elementary school students, up to 29 middle school students, and up to 29 high school students could be generated by the Project's 500-600 employment opportunities, for a total of up to 114 new students in the CUSD.

Table 22
Estimated Proposed Project Student Generation

Elementary School Students	Size	Elementary School Students [a]	Middle School Students [a]	High School Students [a]	Total Students [b]
Proposed Project					
Industrial	1,500,000 sf	56	29	29	114

[a] *Based on LAUSD student generation rates office uses: 0.0000373 elementary, 0.0000194 middle 0.0000192 high school students per square foot of commercial/industrial. LAUSD, Student Generation Rate Calculation, September 2008.*
Source: EcoTierra Consulting, 2014

While the Project could result in a net increase of 500-600 employment opportunities on the Project site, it is anticipated that the majority of such employees would not relocate to within the CUSD and would reside across a large geographic area. Accordingly, it is unlikely that the Project would result in any incremental impact on school capacity at any one school in the CUSD. However, to provide a conservative analysis, it is assumed that all students noted in Table 22 would attend CUSD schools and would be new to the CUSD. Education Code § 17620(a)(1) authorizes any school district to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The CUSD has calculated developer fees of $0.47 per square foot for commercial development.

Thus, Mitigation Measure MM PS-2, which requires the payment of developer impact fees, would offset the cost of providing service for any additional students generated by the Project, and impacts on school services would be less than significant.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. As shown in Table 22a, Estimated Revised Site Plan A Project Student Generation, based on the square footage of the Revised Site Plan A Project, up to 44 new elementary school students, up to 23 middle school students, and up to 23 high school students could be generated by the Project's 500-600 employment

opportunities, for a total of up to 90 new students in the CUSD. Student generation would be lower than under the Site Plan A Project.

Table 22a
Estimated Revised Site Plan A Project Student Generation

Elementary School Students	Size	Elementary School Students [a]	Middle School Students [a]	High School Students [a]	Total Students [b]
Proposed Project					
Industrial	1,154,000 sf	44	23	23	90

[a] *Based on LAUSD student generation rates office uses: 0.0000373 elementary, 0.0000194 middle, and 0.0000192 high school students per square foot of commercial/industrial. LAUSD, Student Generation Rate Calculation, September 2008.*
Source: EcoTierra Consulting, 2015

California Education Code § 17620(a)(1) authorizes any school district to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The CUSD has calculated developer fees of $0.47 per square foot for commercial development.

Thus, Mitigation Measure MM PS-2, which requires the payment of developer impact fees, would offset the cost of providing service for any additional students generated by the Project, and impacts on school services would be less than significant after mitigation.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would include the same level of development as Revised Site Plan A. Estimated student generation from Revised Site Plan B would be the same as Revised Site Plan A. Impacts would be less than significant with implementation of Mitigation Measure PS-1.

MM PS-2. *Before building permits are issued, the applicant shall pay the required School Fees. This condition does not limit the applicant's ability to appeal or protest the payment of these fees to the school districts(s).*

d) Parks?

Less-Than-Significant Impact. The City of Compton Parks and Recreation/Special Services Department manages all municipally owned and operated recreation and park facilities within the City. In general, residential development directly generates demand for recreation and parks facilities. As discussed above, the Project would not directly generate any additional permanent residents. The type of employment offered by the Project would not cause a notable number of people, if any, to move to the City of Compton or the Los Angeles County region. It is anticipated that the Project would accommodate existing employees from the region. Additionally, employees of the Project site would not be expected to use local park or recreational facilities to any great extent, since they typically would not have long periods of time during the workday to visit parks and recreational facilities.

Thus, the Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be

accelerated. Therefore, impacts on parks and recreation services would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts on parks and recreation services would be less than significant and no mitigation measures are required

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts on parks and recreation services would be less than significant and no mitigation measures are required

e) Other public facilities?

Less-Than-Significant Impact. Library services for the project area are provided by the Compton Library, part of the Los Angele County Public Library, located at 240 W Compton Boulevard, approximately 2 miles southeast of the Project site. In general, residential development results in a direct increase in demand on library services. The Project would not generate new residents. The Project would not generate an additional need for library space or volumes of permanent collection. Therefore, there would be a less than significant impact to library services. No mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not generate new residents. The Project would not generate an additional need for library space or volumes of permanent collection. A less than significant impact to library services would occur. No mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not generate new residents. The Project would not generate an additional need for library space or volumes of permanent collection. A less than significant impact to library services would occur. No mitigation measures are required.

15. RECREATION

a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less-Than-Significant Impact. As discussed above in Question 14(d), in general, residential development directly generates demand for recreation and parks facilities. No permanent residential development would occur under the Project. Thus, the Project would not intensify the usage of the available park and recreational facilities. The type of employment offered by the Project would not cause a notable number of people, if any, to move to the City of Compton or the Los Angeles County region. Thus, the Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts on existing neighborhood or regional parks, or other recreational facilities would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Impacts on parks and recreation services would be less than significant and no mitigation measures are required

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The Project would not result in any measurable demand for parks and recreational services and, therefore, would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Impacts on parks and recreation services would be less than significant and no mitigation measures are required

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

Less-Than-Significant Impact. The Project does not include construction of on-site recreational amenities. As discussed above in the response to Question 15(a), the Project would not result in any measurable demand for parks and recreational services and, therefore, would not require the construction or expansion of recreational facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would include similar operational characteristics as Site Plan A and Site Plan B. The Project does not include construction of on-site recreational amenities. Impacts on parks and recreation services would be less than significant and no mitigation measures are required

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would include similar operational characteristics as Site Plan A and Site Plan B. The Project does not include construction of on-site recreational amenities. Impacts on parks and recreation services would be less than significant and no mitigation measures are required

16. TRANSPORTATION/TRAFFIC

The following discussion is based on the trip generation calculations and traffic implications based on the Traffic Impact Analysis for the Proposed Brickyard Commerce Center (Traffic Study). This report was prepared by Hirsch/Green Transportation Consulting, Inc., July 2014 (revised November, 2014). The Traffic Study is included as Appendix K to this Initial Study.

a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrians and bicycle paths, and mass transit?

Less-Than-Significant With Mitigation Incorporated. Two possible development schemes for the Project site were analyzed. Plan A consists of a 1.43 million square foot light industrial warehouse/distribution building (Building A-1) on the main parcel, with truck loading doors running north/south and a 70,000 square foot warehouse/distribution building (Building A-2) off the southern flag lot with single-loaded truck loading doors from the north side. Building A-1 would provide 208 truck loading doors and 575 auto stalls. The auto stalls would be located south of Building A-1. In addition, space for storage of 437 shipping containers would be provided north and south of Building A-1 (298 storage spaces north of Building A-1, 139 spaces south of Building A-1). A total of 87 auto stalls would be provided for Building A-2. These stalls would be located to the west and northwest of Building A-2. Building A-2 would have 11 truck loading doors and no storage spaces for shipping containers.

Plan B consists of a 525,400-square foot warehouse/distribution building (Building B-1) with truck loading doors running east/west on the northwest side of the main parcel; a 481,600-square foot warehouse/distribution building (Building B-2) with truck loading doors running east/west on the northeast side of the main parcel; and a 70,000 square foot light industrial building (Building B-3) off the southern flag lot with single-loaded truck loading doors from the north side. Building B-1 would provide 88 truck loading doors. Building B-2 would provide 111 truck loading doors. Building B-3 would have 11 truck loading doors. Plan B would provide 270 auto stalls for Building B-1, 275 auto stalls for Building B-2, and 87 auto stalls for Building B-3. A total of 314 storage spaces for shipping containers would be provided under this plan – 100 west of Building B-1, 139 between Building B-1 and Building B-2, and 75 east of Building B-2.

Traffic Study Scope and Methodology

The traffic impact analyses in the Traffic Study were conducted using the procedures adopted by the City of Compton's Planning and Economic Development Department and Public Works/Municipal Utilities Department to analyze the potential traffic impacts of the Project. The following contains a detailed analysis of the existing (year 2014) and future (year 2017) weekday AM and PM peak hour traffic conditions at a total of 23 intersections adjacent to or in the vicinity of the Project site. Five of the study intersections (nos. 9, 12, 18, 19, and 20) are under the exclusive jurisdiction of the City of Compton, seven (nos. 3, 4, 6, 7, 11, 15, and 16) are wholly

within the County of Los Angeles, and three locations (nos. 8, 10, and 17) exhibit shared jurisdiction between the City of Compton and the County of Los Angeles. Additionally, five of the study intersections (nos. 1, 2, 5, 13, and 14) are under the sole jurisdiction of the City of Los Angeles, with the remaining three study locations (nos. 21, 22, and 23) under the shared jurisdiction of the City of Compton and City of Carson.

1. Century (I-105) Freeway W/B On/Off-Ramps and Central Avenue
2. Century (I-105) Freeway E/B On/Off-Ramps and Central Avenue
3. Century (I-105) Freeway E/B On/Off-Ramps and Wilmington Avenue
4. 120th Street and Wilmington Avenue
5. El Segundo Boulevard and Figueroa Street
6. El Segundo Boulevard and Main Street
7. El Segundo Boulevard and Avalon Boulevard
8. El Segundo Boulevard and Central Avenue
9. El Segundo Boulevard and Compton Avenue
10. El Segundo Boulevard and Wilmington Avenue
11. 135th Street and Avalon Boulevard
12. Sam Littleton Street/Stockwell Street and Central Avenue
13. Rosecrans Avenue and Harbor (I-110) Freeway S/B On/Off-Ramps
14. Rosecrans Avenue and Harbor (I-110) Freeway N/B Off-Ramp
15. Rosecrans Avenue and Main Street
16. Rosecrans Avenue and Avalon Boulevard
17. Rosecrans Avenue and Central Avenue
18. Rosecrans Avenue and Wilmington Avenue
19. Compton Boulevard and Central Avenue
20. Alondra Boulevard and Central Avenue
21. Greenleaf Boulevard and Central Avenue
22. Artesia Boulevard/Artesia (SR-91) Freeway W/B On/Off-Ramps and Central Avenue
23. Artesia Boulevard/Artesia (SR-91) Freeway E/B On/Off-Ramps and Central Avenue

Each of the 23 study intersections is currently controlled by a typical multi-phase, actuated or semi-actuated traffic signal. Further, the five intersections located within the City of Los Angeles are also equipped with the City of Los Angeles Department of Transportation's ("LADOT") Automated Traffic Surveillance and Control ("ATSAC") traffic signal coordination software, which enhances the overall capacity of a network of interconnected traffic signals by monitoring the traffic flow data from adjacent ATSAC-equipped intersections and adjusting the signal timing and phasing in real time to maximize vehicular throughput and minimize delay. While the remaining study intersections within the other jurisdictions exhibit some operational optimization, they are not improved with ATSAC or other similar advanced timing protocols.

Additionally, in order to improve access between Rosecrans Avenue and its truck-only driveway on McKinley Avenue, and to enhance site access operations at the Central Avenue driveway (opposite 139th Street), the Project proposes to install new traffic signals at the intersections of Rosecrans Avenue and McKinley Avenue, and Central Avenue and E. 139th Street, as part of both the Plan A and Plan B development schemes. Therefore, the following also includes an evaluation of the current technical requirements ("warrants") for each of these new traffic signals.

Further, potential Project-related traffic impacts to several key local and/or residential streets in the Project vicinity were also evaluated. These street segments, listed below, are anticipated to be used to some degree by Project traffic to access the proposed site driveways.

- Central Avenue between Sam Littleton Street and El Segundo Boulevard
- Sam Littleton Street between Stanford Avenue and McKinley Avenue
- Sam Littleton Street between McKinley Avenue and Corlett Avenue
- Sam Littleton Street between Corlett Avenue and Central Avenue
- McKinley Avenue between 136th Street and 137th Street
- McKinley Avenue between 139th Street and Rosecrans Avenue
- Rosecrans Avenue between Avalon Boulevard and Stanford Avenue
- Central Avenue between Rosecrans Avenue and Compton Boulevard.

The locations of the 23 signalized study intersections, two signal warrant analysis locations, and eight street segments analyzed are shown in relation to the Project site in Figure 17 (Study Intersection and Street Segment Locations).

Plan A Project Analysis

Construction Traffic

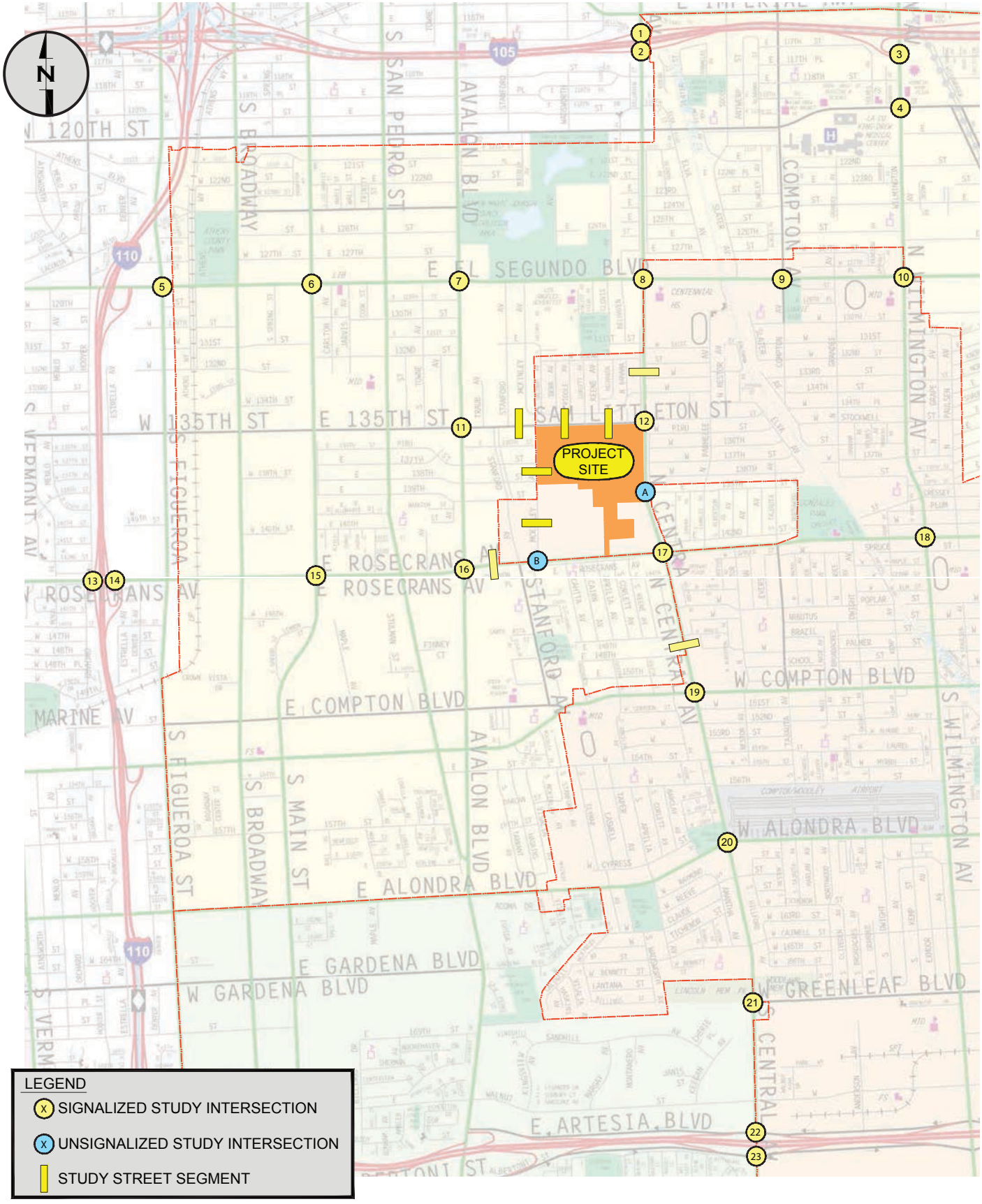
During construction, the Project could include excavation and export or import of up to 30,000 cubic yards of dirt. It is expected that the haul activities would utilize 14 cubic yard capacity trucks, with peak activity of approximately 30 truckloads (one way) per hour over the course of the working day, over a 9- to 15-day period within grading/excavation period. Haul truck activity would be limited to off-peak hours (between the hours of 9:00 AM and 4:00 PM) to eliminate any peak hour impacts. The haul route must be approved by the City of Compton and the Los Angeles County Department of Public Works. Accordingly, no significant impacts would be associated with this activity, since the activities will occur outside the peak commute traffic periods, when overall traffic volumes on the area roadways are reduced from their peak hour levels.

In addition, because of shift requirements, most if not all construction worker trips would occur during off peak hours (i.e. inbound trips prior to 7 AM and outbound trips prior to 3 PM). Although construction deliveries could occur during peak hours, the level of truck traffic associated with these deliveries would be less than the level of truck activity on the site that is occurring as of 2014 (i.e., 229 daily truck trips). Deliveries and construction worker parking would be accommodated within the Project Site and would not significantly affect surrounding roadways. Construction traffic impacts associated with Site Plan A would be less than significant.

Trip Generation

The typical traffic-generating characteristics associated with a variety of common land uses, including warehouse/distribution center facilities such as those proposed for the Project site, have been extensively surveyed and documented in studies conducted under the auspices of the Institute of Transportation Engineers ("ITE"), with the most current information provided in the 9th Edition of ITE's *Trip Generation* manual.[57] Based on the intended operations of the Project, which will receive goods from manufacturers, shippers, and other warehouses for re-distribution to other destinations, with on-site storage of such goods generally limited to short periods between receipt and reshipping, the ITE High-cube Warehouse/Distribution Center land use category was identified as the most appropriate category for use in evaluating the traffic

[57] *Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, D.C., 2012.*



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 17
Study Intersection And Street Segment Locations

generation characteristics of the Project. The trip generation rates used to estimate the overall number of trips generated by the Project are summarized in Table 23 (Project Trip Generation Rates).

The "Baseline" ITE trip generation rates shown in Table 23 are typically derived through direct counts of the number of vehicles actually entering and exiting the driveways of the surveyed land use, and as such, do not generally account for a number of factors that can influence the amount of "net" traffic (number of new vehicle trips added to the street system) associated with that land use. For typical single-use commercial developments such as the Project, the most pertinent of these factors include the use of public transit by employees or visitors (which reduces the number of vehicles entering or exiting the Project site), and "pass-by" traffic (the "capture" of an existing trip passing the Project site; such trips are not considered to be newly generated Project-related traffic). However, in order to provide a conservative analysis of the potential traffic impacts of the Project, no trip adjustments (reductions) to account for potential transit utilization by Project employees beyond that intrinsically included in the ITE trip generation rates were used for the Project. Additionally, since the Project's warehouse/distribution center operations are considered to be a "destination" employment use, no trip reductions related to "pass-by" traffic activity are applicable to the Project.

Table 23
Project Trip Generation Rates

Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out
High-Cube Warehouse/Distribution Center	1.68 (A)	0.11 (A)	69%	31%	0.12 (A)	31%	69%

A = Building Area in 1,000 square feet
Notes: All trip generation rates per 9th Edition ITE, Trip Generation, unless otherwise noted.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

However, due to the type of development proposed (warehouse/distribution center containing a number of truck loading docks), it is expected that a number of "heavy" (single-unit and semi-trailer) trucks will enter and exit the site on a daily basis. Thus, while the ITE trip generation equations shown in Table 22 can be used to estimate the total number of daily and peak hour vehicle trips resulting from development of the Project (which consists of both employee-related automobile trips and delivery/transportation-related truck trips), these rates do not fully account for the effects on traffic flows of larger multi-axle single-unit and semi-trailer trucks, which occupy more space on the roadway and produce more disruptive traffic effects than do typical passenger vehicles or light-duty trucks. To this end, the City of Fontana's *Truck Trip Generation Study (August 2003)*, an industry-standard data source for analysis of truck traffic impacts in Southern California, was consulted. The ITE data related to the selected "High-cube Warehouse/Distribution Center" land use indicates that between approximately nine and 29 percent of the total peak hour vehicular traffic generated by such uses is due to truck trips; similarly, the data included in the City of Fontana *Truck Trip Generation Study* noted that 20.43 percent of the total vehicular traffic generated by "Heavy Warehouse" uses (both daily and peak hour) was truck-related. Therefore, since this value falls within the range noted by ITE (at the higher end of the range), the Fontana *Truck Trip Generation Study* data was considered to be applicable for use with the ITE's more general trip generation data, and as such, was used to refine the ITE trip generation calculations to identify the number of truck trips included in the total trip values.

Therefore, for purposes of the analysis of the potential effects of the Project on the study area traffic conditions, it was assumed that 79.57 percent of the total daily and peak hour traffic

generated by the Project will be due to typical passenger (automobiles and light-duty pickups, etc.) vehicles, with the remaining 20.43 percent of the Project's traffic generated by large (multi-axle single-unit and semi-trailer) trucks. The truck-related trips were then further categorized by their size and operational characteristics (which relate to the actual traffic effects of the vehicles) using data from the Fontana *Truck Trip Generation Study*, which identifies that approximately 17 percent of the total truck traffic (3.46 percent of the total Project-related traffic) is due to large two-axle trucks, while about 23 percent (4.64 percent of the total Project-related traffic) is associated with three-axle trucks, with the remaining approximately 60 percent of the truck-related traffic (12.33 percent of the total Project trips) resulting from four-axle or larger vehicles (including semi-trailer trucks). These effects are generally evaluated using a factor known as "passenger car equivalency" ("PCE"), which adjusts the number of truck trips to represent an equivalent number of typical passenger vehicles in order to account for the greater comparative impacts of large trucks on traffic flows. Therefore, for purposes of the analysis, the anticipated truck traffic generated by the Project was assigned PCE values of 1.5 for large two-axle trucks, 2.0 for three-axle trucks and 3.0 for four-axle or larger trucks, meaning that these vehicles produce traffic-influencing effects equivalent to between one and one-half and three times that of typical passenger vehicles, which are, by definition, assigned a PCE value of 1.0. These PCE values were derived from the Fontana *Truck Trip generation Study*. The Fontana *Truck Trip Generation Study* also provides information related to the directionality of the truck trips ("inbound" and "outbound") for both the AM and PM peak hours, and this data was used to estimate the number of entering and exiting truck trips during these periods.

Based on these assumptions, the new traffic resulting from the Project itself was estimated using the following procedures. First, the "total" number of trips generated by the Project (actual number of vehicles) was calculated using the ITE trip generation rates shown earlier in Table 23. These values were then subdivided into trips generated by typical passenger vehicles, as well as from the various truck types (two-axle, three-axle, and four-axle). Their associated "inbound/outbound" trip "splits" (directionality of the trips) were identified, with the resulting values then adjusted using the applicable PCE values described previously.

The number of inbound and outbound truck trips were first identified using the information from the Fontana study. These values were then subtracted from the ITE-based "total traffic" values during the AM and PM peak hours, with the remaining trips assumed to be generated by typical passenger vehicles. While this methodology results in "inbound/outbound" trip split percentages for the passenger vehicles that are slightly different than those identified in the ITE trip rates (approximately 76 percent inbound/24 percent outbound for the total Project versus the ITE values of 69 percent inbound/31 percent outbound during the AM peak hour, and approximately 26 percent inbound/74 percent outbound for the total Project versus ITE's 31 percent inbound/69 percent outbound during the PM peak hour), the total number of vehicles entering and exiting the Project site during each of the peak hours will match those calculated for the combined passenger vehicle/truck trips using the ITE trip generation rates. As such, the "adjusted" passenger vehicle inbound/outbound trip splits used result in only nine more inbound and nine fewer outbound passenger vehicles during the AM peak hour than if the ITE trip splits were applied directly to the passenger vehicle trips, and only seven fewer inbound and seven more outbound passenger vehicle trips compared to the application of the ITE trip splits during the PM peak hour. These nominal trip differences are not anticipated to produce any substantial differences in the results of the evaluation of the Project's impacts on the intersections and streets surrounding the Project site, while remaining consistent with both the ITE and Fontana truck study trip generation data.

However, unlike the traffic resulting from the proposed Plan A Project development scheme, the traffic generated by the uses and operations existing on the Project Site at the time the

environmental analysis commenced (referred in this analysis as the "Project Site 2014 uses", which consist of uses prior to demolition activities and include uses that are primarily associated with Atkinson Brick, the MPD yard and associated facilities, and the excavation pit "reverse mining" operations) was identified through actual counts of the number and types of vehicles entering and exiting the Project site during both the AM and PM peak traffic periods (contained in Appendix A of the Traffic Study found in Appendix K of this Draft Initial Study). The total daily traffic generated by the Project Site 2014 uses and activities was not collected directly, but was instead estimated by applying the ratio of "daily trips-to-total peak hour trips" from a similar land use to the empirical traffic data obtained from the actual peak period site driveway counts. The ITE "General Light Industrial" (Land Use 110)" category was assumed to reasonably represent the traffic-generating characteristics of the Project Site 2014 uses. According to the ITE data, this land use exhibits a "daily trips-to-total peak hour trips" ratio of approximately 3.69 (meaning that the total daily traffic for general light industrial uses is approximately 3.69 times the sum of the AM and PM peak hour traffic). Therefore, based on this methodology, the peak hour trips produced by the Project Site 2014 activity, as identified through the empirical counts, were factored using the calculated "daily trips-to-total peak hour trips" ratio (for "General Light Industrial" use) of approximately 3.69 in order to estimate the total amount of daily traffic accessing the Project site. The empirical site-related traffic counts also directly identified the number of passenger vehicles and the various types of trucks currently accessing the Project site, and as with the Project, the Project Site 2014 truck trips were adjusted to reflect the PCE factors (note, however, that no "two-axle trucks" were observed).

Based on these assumptions and methodologies, the number of trips expected to be generated by the Project were calculated, while the number of trips associated with the operations of the exiting on-site development (all of which were active at the time the intersection and street traffic volume counts were collected) were calculated. The resulting "net" site-related traffic effects of the development of the Project are summarized in Table 24 (Net Site-Related Trip Generation Estimates). Table 24 contains only the adjusted PCE values for both the Project and the Project Site 2014 uses, along with the net PCE-adjusted Project-related trips. The actual number of measured and calculated truck trips at the Project Site can be found in Appendix K to this Draft Initial Study.

When adjusted to account for the truck-related PCE factors, the Project is expected to result in a total increase in net site-related traffic of approximately 2,350 PCE trips per day, including approximately 49 net PCE trips (38 inbound, 11 outbound) during the AM peak hour, and approximately 149 net PCE trips (38 inbound, 111 outbound) during the PM peak hour[58]. As shown in Table 24 (Net Site-Related Trip Generation Estimates), the development of the proposed Plan A Project will result in increases of approximately 1,831 passenger vehicle and 519 PCE truck-related trips per day, including a net increase of approximately 110 passenger vehicle trips (89 inbound, 21 outbound) and a reduction of approximately 61 PCE truck trips (reductions of 51 inbound, 10 outbound) during the AM peak hour, and net increases of approximately 117 passenger vehicle trips (29 inbound, 88 outbound) and 32 PCE truck trips (nine inbound, 23 outbound) during the PM peak hour. This level of net trip generation was used to evaluate the potential impacts of the Project on the surrounding street and highway network.

The amount of Project-related traffic entering or exiting the Project site occurring during the peak hours is relatively small when compared to the Project's expected total daily traffic generation,

[58] *Total PCE trips reflect a total of 515 daily Project-related truck trips, including 86 2-axle trucks, 116 3-axle trucks, and 313 4-axle trucks, of which 34 (5 2-axle,7 3-axle, and 22 4-axle) would occur during AM peak hour and 37 (6 2-axle,8 3-axle, and 23 4-axle) would occur in the PM peak hour.*

with approximately 6.5 percent of the total (unadjusted) daily trips (for both passenger vehicles and trucks) occurring during the AM peak hour, and about 7.1 percent of the total daily trips occurring during the PM peak hour. This condition is characteristic of "high-cube" warehouses, and is due primarily to the multiple-shift operations of such facilities. Work shift change periods typically generate the majority of the passenger vehicle trips associated with facilities that operate under such conditions, as employees of one work shift leave and employees working the subsequent shift arrive. However, shift changes routinely occur at times outside (before or after) the typical AM and PM peak commute traffic hours, and as such, do not directly or fully impact these critical traffic periods. Additionally, during most shift changes, much of the incoming shift traffic arrives at the site prior to the departure of the current shift employees (so that the operations of the facility can continue uninterrupted during the change in shifts), minimizing the amount of "overlap" traffic (inbound and outbound trips occurring at the same time), and further reducing the amount of employee-related automobile traffic that occurs during either the AM or PM peak commute hours analyzed in this study.

Table 24
Net Site-Related Trip Generation Estimates

Size/Use	Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Proposed Plan A Project Trips							
Total Proposed Plan A Project Trips (in PCE)	**3,304**	**139**	**80**	**219**	**80**	**157**	**237**
Total Proposed Plan A Project Automobile Trips	*2,005*	*99*	*32*	*131*	*37*	*106*	*143*
Total Proposed Plan A Project Truck Trips (in PCE)	*1,299*	*40*	*48*	*88*	*43*	*51*	*94*
Project Site 2014 Uses Trips							
Total Project Site 2014 Trips (in PCE)	**954**	**101**	**69**	**170**	**42**	**46**	**88**
Total Project Site 2014 Automobile Trips	*174*	*10*	*11*	*21*	*8*	*18*	*26*
Total Project Site 2014 Truck Trips (in PCE)	*780*	*91*	*58*	*149*	*34*	*28*	*62*
Net New Plan A Site-Related Automobile Trips	1,831	89	21	110	29	88	117
Net New Plan A Site-Related Truck Trips (in PCE)	519	(51)	(10)	(61)	9	23	32
Total Net New Plan A Site-Related Trips (in PCE)	**2,350**	**38**	**11**	**49**	**38**	**111**	**149**

Note: Values in (parentheses) indicate reductions from existing trips.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Geographic Trip Distribution

The general geographic distribution of Project-related traffic through the local study area and surrounding region was identified separately for the passenger vehicle trips and for the truck-related trips. This distinction between the general trip distributions for passenger vehicles and trucks is related primarily to restrictions on truck traffic on a number of the area roadways, which limit the access routes to and from the Project site that can be used by large trucks. Typical passenger vehicles exhibit no such restrictions and, therefore, can be assigned more generally to the area roadway network. The general geographic traffic distributions assumed were based primarily on a review of the relative distribution of the population from which employees of the proposed warehouse/distribution center Project would be drawn, and from the anticipated likely origin and destination locations of the truck-related trips, although the existing traffic patterns in the Project vicinity and surrounding area were also reviewed.

The resulting general geographic distributions associated with the Project-related trips are shown, by vehicle type and transportation facility used (surface street or freeway), in Table 24 (Geographic Project Trip Distribution Percentages). This table is intended only to identify the general regional travel patterns used by Project traffic to travel to and from the Project site. For example, Table 25 shows that all Project-related truck traffic will travel to and from the larger study area via the freeway system, although it is acknowledged that, since the Project is not immediately adjacent to and does not provide direct freeway access, trucks will need to utilize certain surface streets in order to travel between the Project site and the surrounding freeways. The geographic trip distributions shown in Table 25 are also assumed to represent the typical travel patterns for Project traffic throughout the day, including during both the AM and PM peak hours.

However, while the trip distribution shown in Table 25 was also used as a general guide for assigning traffic associated with the Project Site 2014 uses to the area transportation facilities, the travel patterns for the existing site-related traffic was based on measured data, which identified the arriving and departing direction for such traffic as it entered and exited the Project site. Therefore, travel patterns for Project Site 2014 traffic are somewhat different from the assumed Project-related traffic distribution patterns.

Table 25
Geographic Project Trip Distribution Percentages

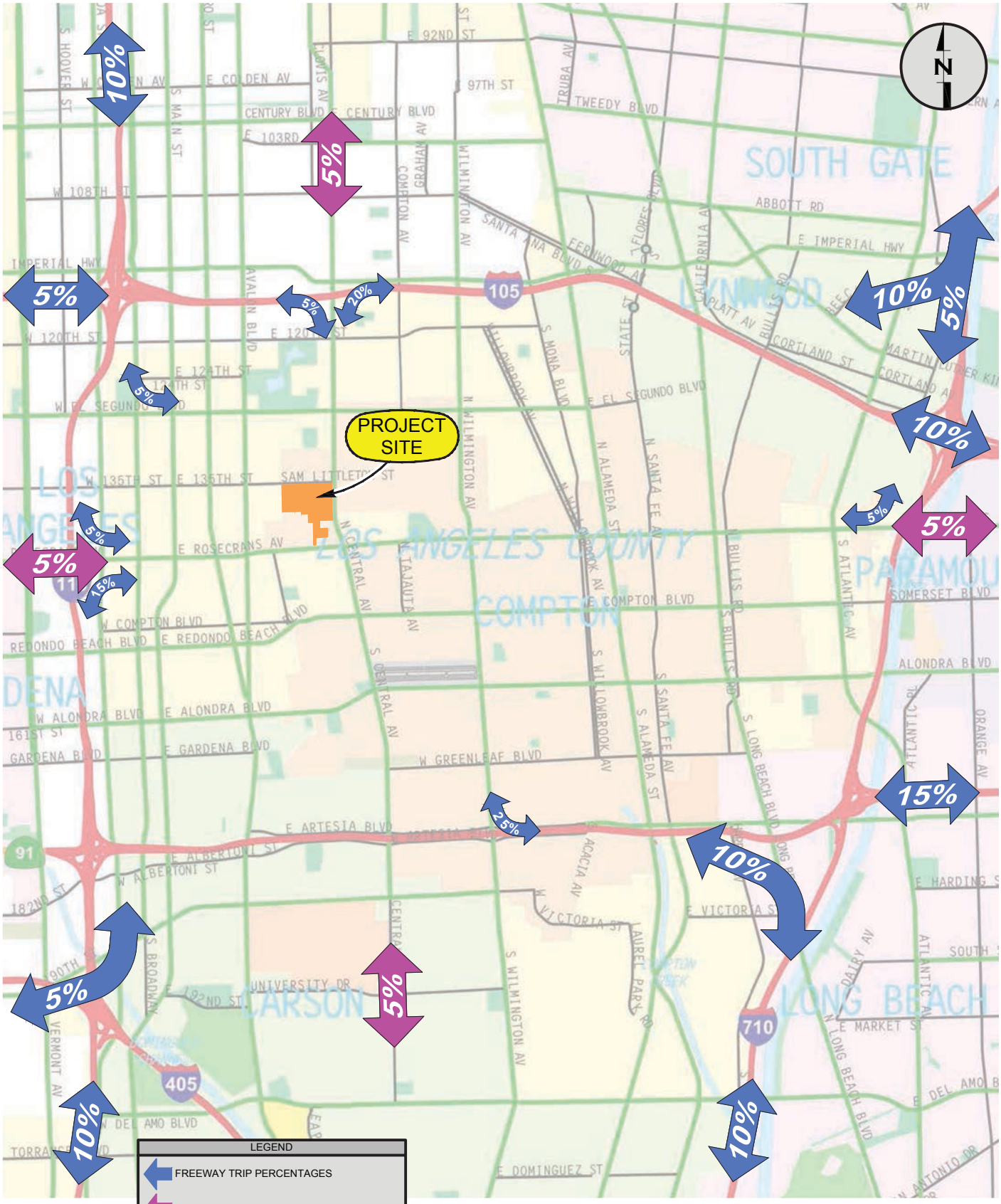
	Passenger Vehicles			Trucks		
Direction	**Street**	**Freeway**	**Total**	**Street**	**Freeway**	**Total**
North	5%	25%	30%	0%	20%	20%
South	5%	20%	25%	0%	45%	45%
East	5%	25%	30%	0%	25%	25%
West	5%	10%	15%	0%	10%	10%
Totals	**20%**	**80%**	**100%**	**0%**	**100%**	**100%**

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Traffic Assignment

The resulting general geographic distribution percentages used to assign traffic associated with both the Project Site 2014 and With Project site uses to the key transportation facilities in and surrounding the study area are shown in Figure 18 (Project General Geographic Distributions (Passenger Vehicles)) for the passenger vehicle traffic, while Figure 19 (Project General Geographic Distributions (Trucks)) identifies this same information for the truck-related traffic. As discussed previously, these general geographic trip distributions are assumed to represent the travel patterns of the Project Site 2014 and/or With Project uses during both the AM and PM peak hours.

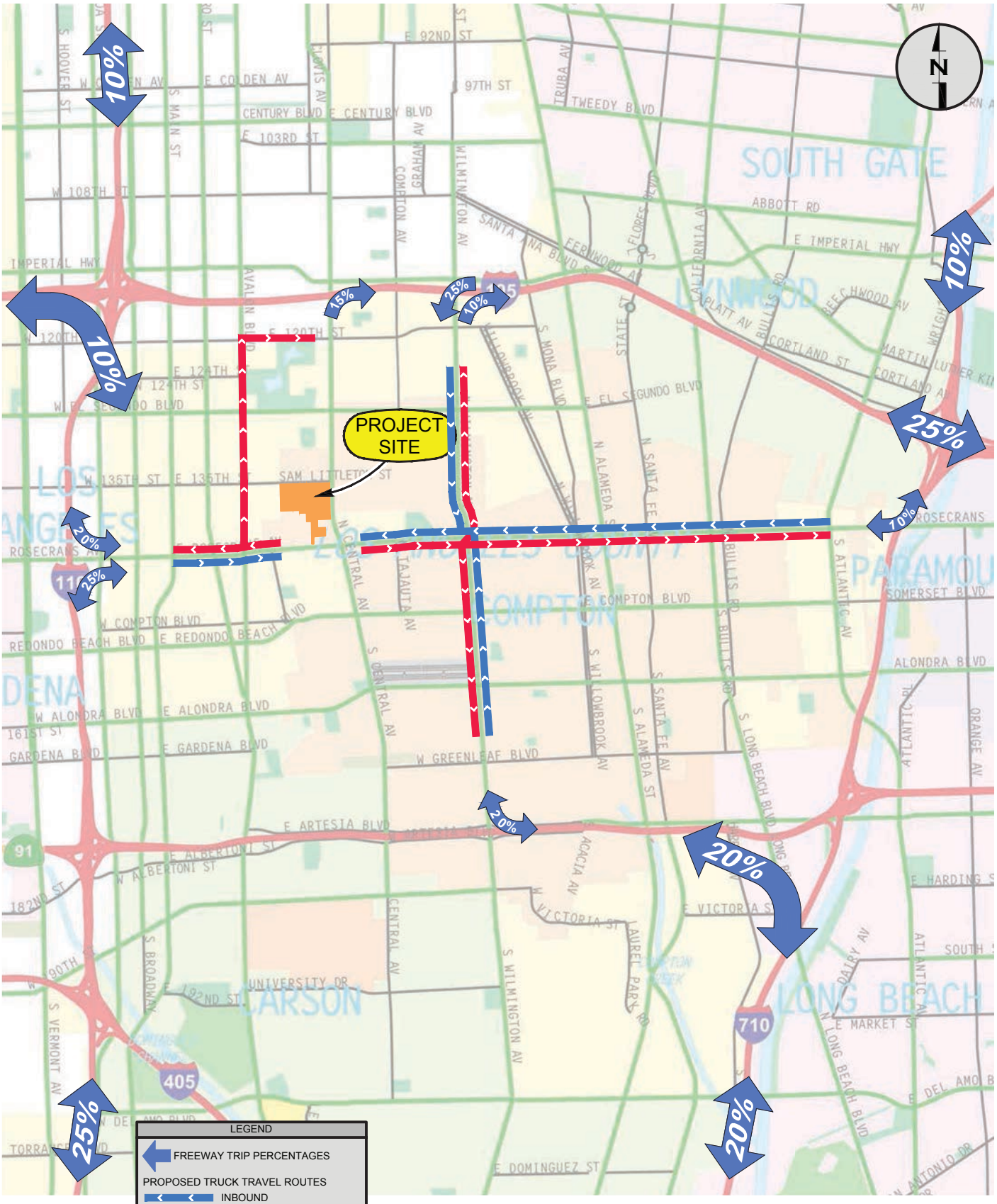
The general geographic traffic assignments shown in Figures 18 and 19 were then further refined to identify the specific movement of site-related traffic along the local area streets and through each of the study intersections. This step considered a number of factors that will influence the Project traffic's access routes and travel patterns, including the locations and operations of the Project-serving driveways (such as truck or passenger vehicle access only, and entry and/or exit movement restrictions), and existing travel restrictions on area roadways (such as the "No Truck Route" restriction along Central Avenue through the City of Compton, or the City's expressed desire to restrict or prohibit truck traffic in residential areas).



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 18
Project General Geographic Distributions (Passenger Vehicles)



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

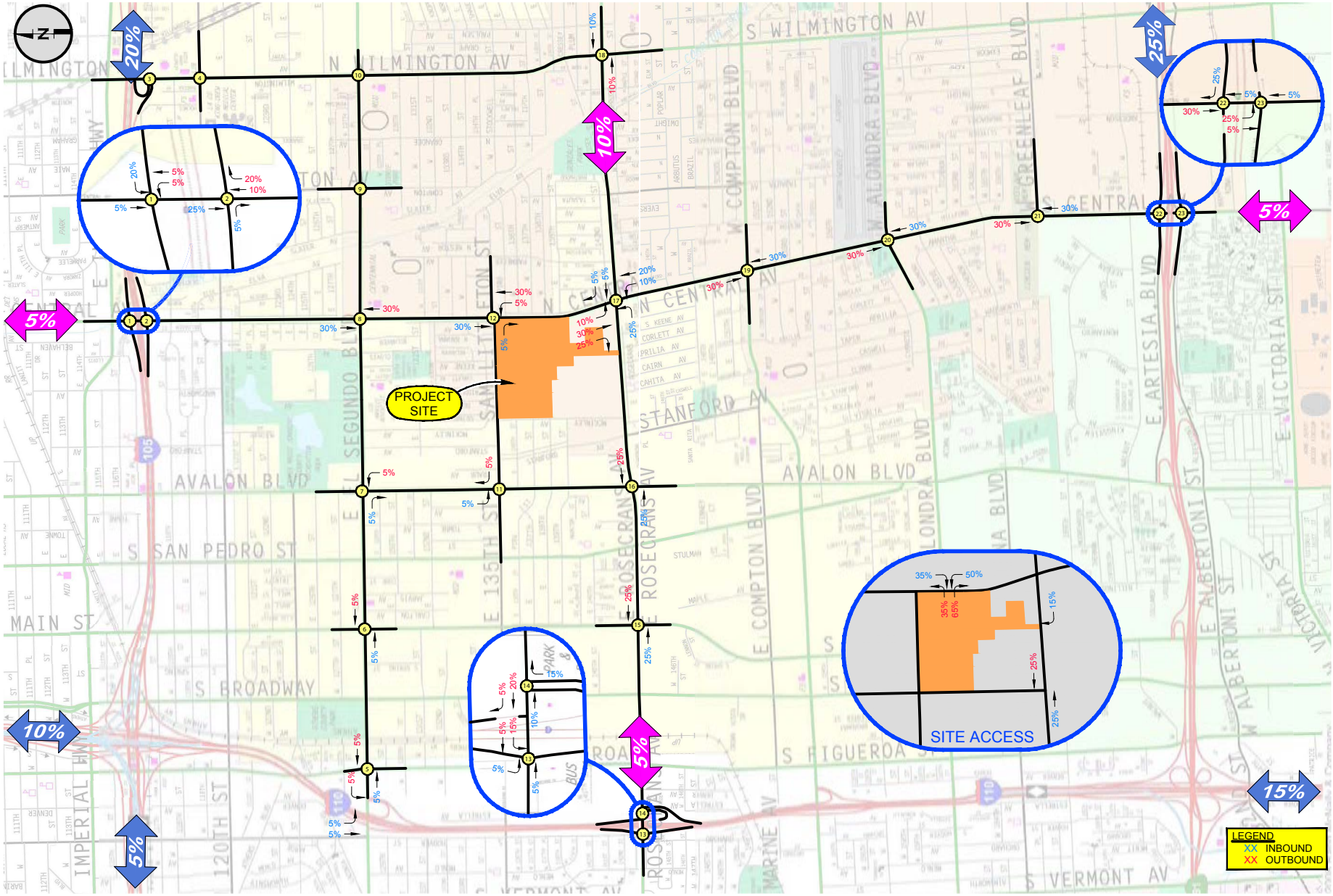
EcoTierra consulting

Figure 19
Project General Geographic Distributions (Trucks)

The Plan A Project will provide passenger vehicle access to the proposed on-site automobile parking facilities (generally located within a surface parking lot near the center of the site) via two driveways; the "full-access" driveway on Central Avenue (opposite 139th Street), and the right-turn-only, entry-only driveway on Rosecrans Avenue just to the east of Aprilia Avenue. Truck access to the Plan A development scenario Building A-1 and Building A-2 loading docks (and the container/trailer storage and truck parking spaces located in the northern portion of the site surrounding Building A-1), will also be provided at the driveway on Central Avenue opposite 139th Street (although trucks using this access location will be restricted to left-turn entry and right-turn exit moves), at the right-turn-only, entry-only driveway on Rosecrans Avenue, and at a third, truck-only driveway located on McKinley Avenue opposite 138th Street, which will be restricted to right-turn entry and left-turn exit only moves as requested by the City to prevent Project-related trucks from traveling on McKinley Avenue north of this access location to or from Sam Littleton Street. (The Plan A Project also includes an emergency vehicle-only access driveway on Central Avenue opposite Piru Street, which will be gated and not used for vehicular or truck access under the Plan A Project scheme.) However, unlike the Project, which provides multiple automobile and truck-related access points in order to protect adjacent residential neighborhoods and to minimize impacts to any individual single street or intersection near the site, access to the existing facilities occupying the site is provided only via driveways located along Central Avenue, and as such, all traffic associated with Project Site 2014 activities occurs along the Central Avenue site frontage.

Based on the proposed Plan A Project site driveway location and operational assumptions described above, the Project-related traffic turning movement assignment percentages at each of the 23 study intersections and on the eight local/residential streets were identified. The Project-related passenger vehicle and truck traffic components were assumed to exhibit somewhat different overall travel patterns and site access characteristics, and were each assigned separately. Additionally, while as shown in Figure 19, the truck trips associated with the Plan A Project Building A-1 and Building A-2 are assumed to exhibit the same general travel patterns to and from the Project vicinity, trucks associated with Building A-1 are expected to access the Project site differently than the Building A-2 trucks (Building A-1 truck traffic is not anticipated to use the Rosecrans Avenue driveway, while the trucks associated with Building A-2 are not expected to utilize the McKinley Avenue driveway). The resulting trip assignment percentages are shown in Figure 20 (Plan A Project Traffic Assignment Percentages (Passenger Vehicles)) for all Project-related passenger vehicles, while the Project's truck trip assignment percentages for Building A-1 and for Building A-2 are shown in Figure 21 (Plan A Project Traffic Assignment Percentages (Building "A-1" – Trucks)) and Figure 22 (Plan A Project Traffic Assignment Percentages (Building "A-2" – Trucks)), respectively.

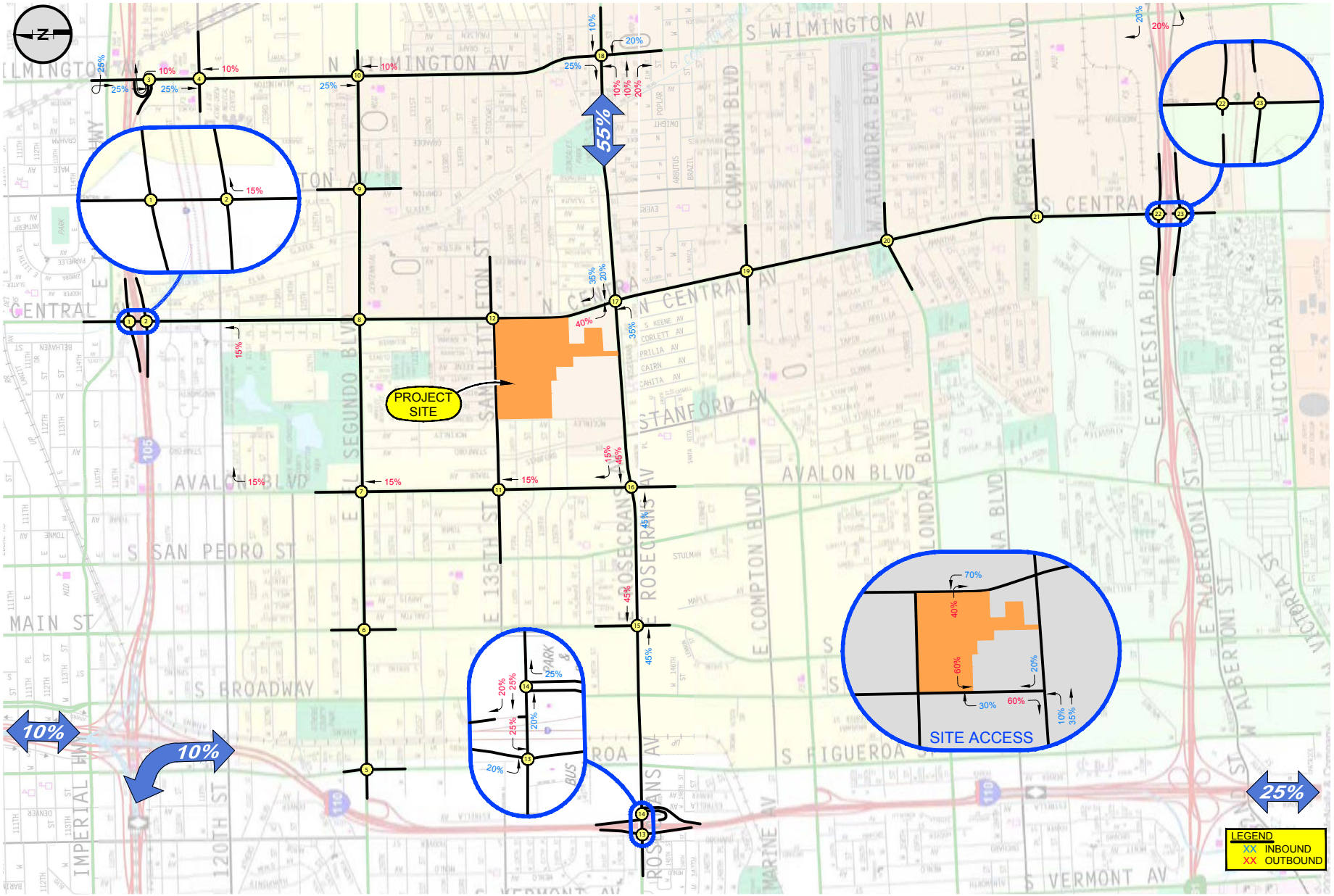
The net new site-related PCE-adjusted trips, reflecting the anticipated changes in traffic at each of the 23 study intersections due to the development of the Project, were calculated by subtracting the Project Site 2014-related trips from the "Project-only" trips, and the results are shown in Figure 23 (Net Site-Related Plan A Traffic Volumes – AM Peak Hour) and Figure 24 (Net Site-Related Plan A Traffic Volumes – PM Peak Hour) for the AM and PM peak hours, respectively. The net site-related traffic volumes were used to identify the potential Project-related traffic impacts at each of the study intersections.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 20
Plan A Project Traffic Assignment Percentages (Passenger Vehicles)

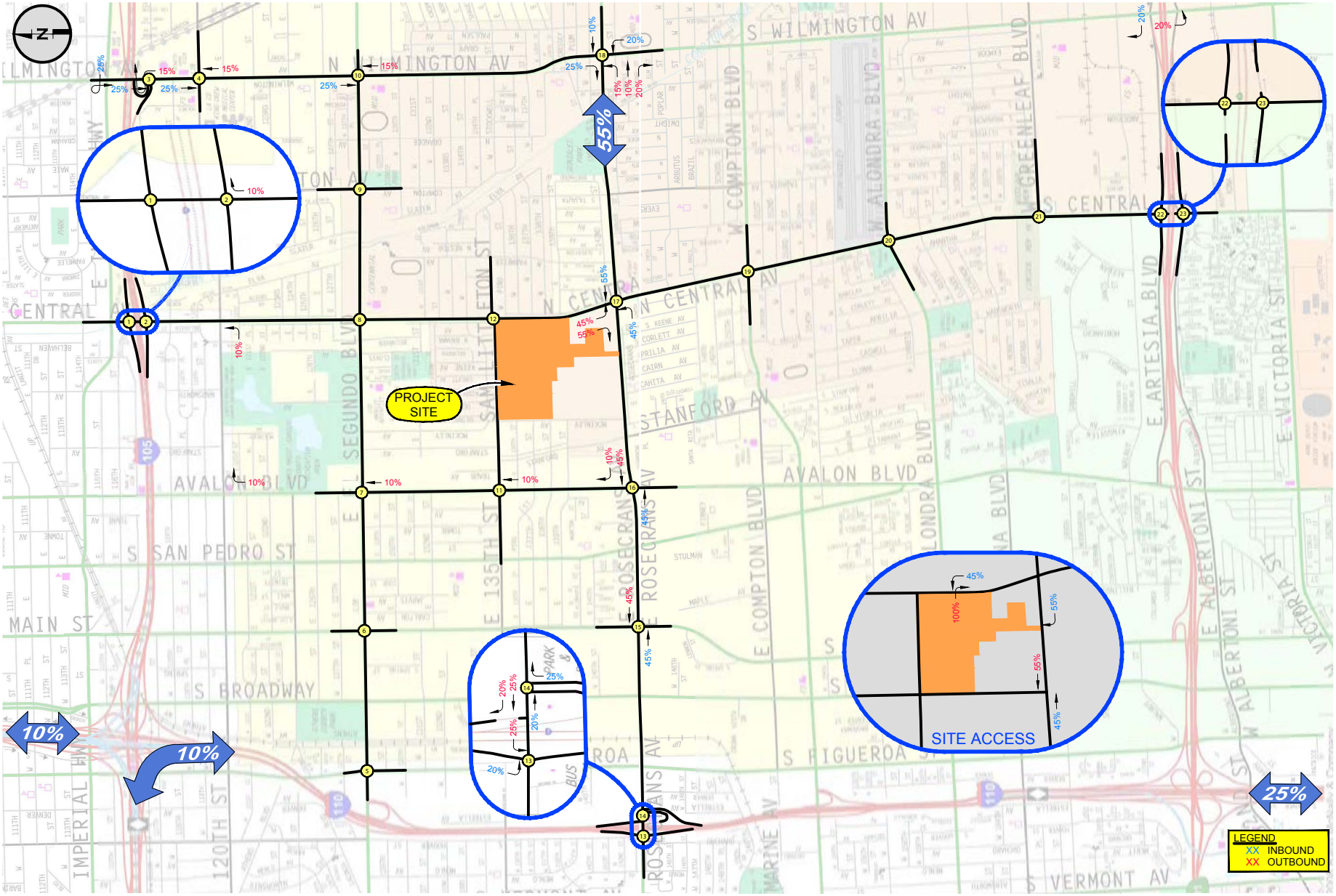


Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 2
Plan A Project Traffic Assignment Percentages (Building "A-1" – Trucks

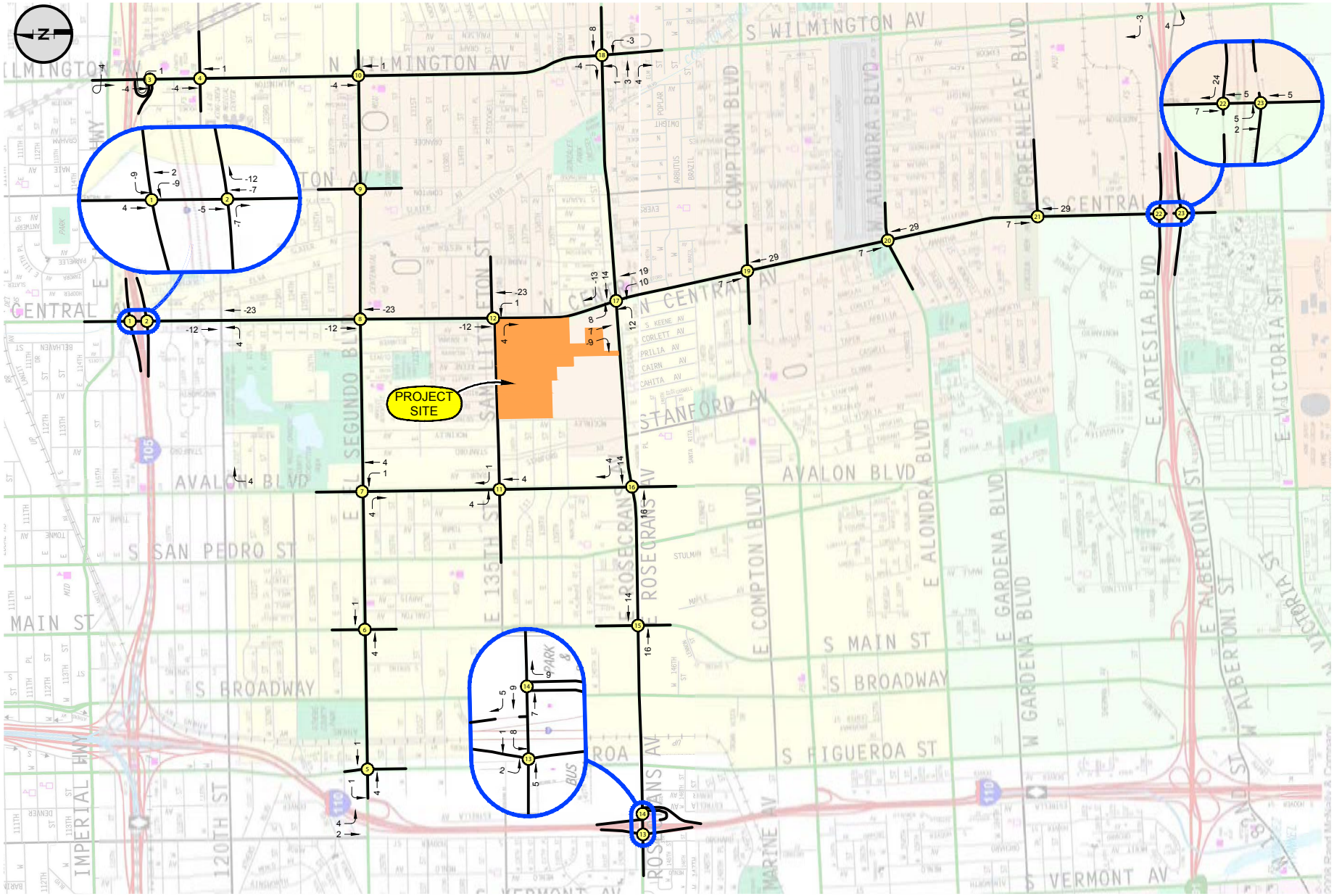
#10.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 22
Plan A Project Traffic Assignment Percentages Building "A-2" – Trucks)

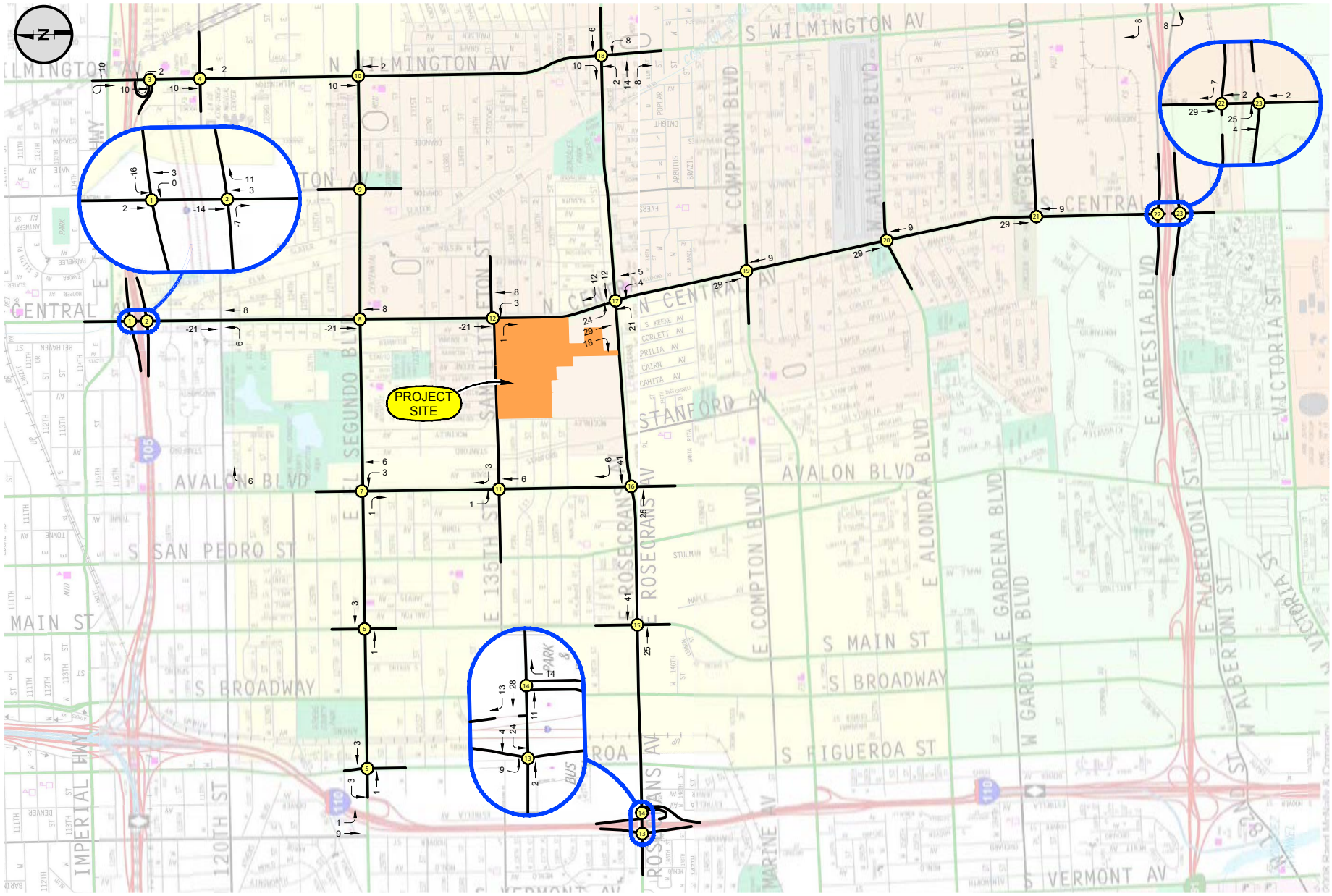


Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 2
Net Site-Related Plan A Traffic Volumes – AM Peak Hou

#10.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 24
Net Site-Related Plan A Traffic Volumes – PM Peak Hour

Intersection Impacts

Existing (Year 2014) Conditions

The weekday peak hour traffic volume data for 14 of the 23 study intersections were obtained from counts performed for this study in late May, late October, and early November of 2013. Following a review of the preliminary scope of the traffic study, and subsequent to the initial data collection, the City of Compton requested that nine additional intersections be included for analysis, and accordingly, traffic volume data for these additional locations were collected in late April of 2014.

The Traffic Study used the Critical Movement Analysis ("CMA") methodology as the basis for the analysis and evaluation of traffic operations at signalized intersections; the CMA procedures are applicable for the evaluation of signalized intersection operations during the weekday peak hour analysis periods. The capacities used in the CMA methodology are assigned to the various intersection operating conditions based on the number of traffic signal phases, as shown in Table 26 (Critical Movement Analysis Volume Ranges per Level of Service). For intersection analysis and transportation planning purposes, the CMA methodology typically equates the capacity of an intersection to the value of Level of Service ("LOS") E for the applicable number of signal phases. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

Table 26
CMA Volume Ranges per Level of Service *
Maximum Sum of Critical Volumes (VPH)
vs. Number of Signal Phases

Level of Service	Two Phases	Three Phases	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 - - - - - - - - -		

** For planning applications only. Not appropriate for operations/design applications.*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

"Level of Service" describes the quality of traffic flow through an intersection. LOS A through LOS C provide good traffic flow characteristics, with little or no congestion or vehicle delay. LOS D is the condition for which most metropolitan area street systems are designed, and represents the highest level of smooth traffic flow. LOS E represents volumes at or near the capacity of the intersection and can result in stoppages of momentary duration and unstable traffic flow at the upper reaches of this condition. LOS F occurs when a facility is overloaded and is characterized by stop-and-go traffic with stoppages of long duration. LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown in Table 27 (Level of Service as a Function of CMA Value).

Table 27
Level of Service as a Function of CMA Value

CMA Value	Level of Service	Intersection Operation/Traffic Flow Characteristics
≤ 0.600	A	No congestion; all vehicles clear in a single cycle.
> 0.600 ≤ 0.700	B	Minimal congestion; all vehicles still clear in a single cycle.
> 0.700 ≤ 0.800	C	No major congestion; most vehicles clear in a single cycle.
> 0.800 ≤ 0.900	D	Generally uncongested, but vehicles may wait through more than one cycle; short duration queues may form on critical approaches.
>0.900 ≤ 1.000	E	Increased congestion on critical approaches; long duration queues form at higher end of range.
> 1.000	F	Over capacity; forced flow with long periods of congestion; substantial queues form.

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Additionally, as described previously, ATSAC traffic signal coordination upgrades have been implemented at each of the five signalized study intersections under the jurisdiction of the City of Los Angeles. However, since none of the remaining 18 study intersections located within the City of Compton, City of Carson, or County of Los Angeles exhibit advanced signal synchronization systems, no ATSAC-related adjustments to the baseline CMA values were deemed appropriate at these locations.

By applying the analysis procedures and assumptions, the existing (year 2014) AM and PM peak hour conditions (CMA value and corresponding LOS) at each of the 23 study intersections were calculated, and are summarized in Table 28 (Critical Movement Analysis Summary, Existing (2014) Without and With Plan A Project Conditions).

As indicated in Table 28, a total of 22 of the 23 study intersections currently exhibit “acceptable” operating conditions during the most critical times of the day; as noted earlier, only the intersection of Rosecrans Avenue and Wilmington Avenue exhibits “undesirable” (LOS E or LOS F) conditions (as indicated in by bold text in Table 28, and only during the PM peak hour). Recent field observations also confirm that the roadways and intersections within the study area typically operate at reasonable levels for urban conditions, with most vehicles clearing the intersections during one or two signal cycles under normal conditions. However, it is acknowledged that several of the key roadways within the study area carry high traffic volumes during the peak commute periods, and that traffic flows on these facilities generally exhibit slow speeds and “stop-and-go” conditions during these times, resulting in the undesirable LOS E or LOS F intersection operations. During these critical periods, failure of any of the intersections along these high-traffic arterial corridors due to accidents, higher than typical pedestrian volumes, vehicles blocking traffic at intersections, or other factors can result in abnormal operations ranging from localized short-term congestion and delays to cascade failures affecting entire travel corridors and producing gridlock conditions for extended periods throughout the area.

Table 28
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Plan A Project Conditions

Int. No.	Intersection	Peak Hour	No Project (2014)		Existing With Plan A Project (2014)		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps	AM	0.598	A	0.597	A	-0.001
	and Central Avenue [1]	PM	0.797	C	0.797	C	0.000
2	I-105 Freeway EB On/Off-Ramps	AM	0.545	A	0.541	A	-0.004
	and Central Avenue [1]	PM	0.498	A	0.497	A	-0.001
3	I-105 Freeway EB On/Off-Ramps	AM	0.694	B	0.693	B	-0.001
	and Wilmington Avenue	PM	0.634	B	0.639	B	0.005
4	120th Street/119th Street	AM	0.571	A	0.569	A	-0.002
	and Wilmington Avenue	PM	0.595	A	0.596	A	0.001
5	El Segundo Boulevard	AM	0.472	A	0.472	A	0.000
	and Figueroa Street [1]	PM	0.634	B	0.634	B	0.000
6	El Segundo Boulevard	AM	0.444	A	0.444	A	0.000
	and Main Street	PM	0.519	A	0.519	A	0.000
7	El Segundo Boulevard	AM	0.625	B	0.625	B	0.000
	and Avalon Boulevard	PM	0.809	D	0.811	D	0.002
8	El Segundo Boulevard	AM	0.855	D	0.851	D	-0.004
	and Central Avenue	PM	0.856	D	0.859	D	0.003
9	El Segundo Boulevard	AM	0.569	A	0.569	A	0.000
	and Compton Avenue	PM	0.527	A	0.527	A	0.000
10	El Segundo Boulevard	AM	0.583	A	0.582	A	-0.001
	and Wilmington Avenue	PM	0.737	C	0.741	C	0.004
11	135th Street	AM	0.320	A	0.321	A	0.001
	and Avalon Boulevard	PM	0.504	A	0.507	A	0.003
12	Sam Littleton Street/Stockwell Street (135th Street)	AM	0.496	A	0.495	A	-0.001
	and Central Avenue	PM	0.571	A	0.567	A	-0.004
13	Rosecrans Avenue	AM	0.736	C	0.741	C	0.005
	and I-110 Freeway SB On/Off-Ramps [1]	PM	0.644	B	0.660	B	0.016
14	Rosecrans Avenue	AM	0.525	A	0.532	A	0.007
	and I-110 Freeway NB Off-Ramp [1]	PM	0.509	A	0.523	A	0.014
15	Rosecrans Avenue	AM	0.455	A	0.458	A	0.003
	and Main Street	PM	0.575	A	0.581	A	0.006
16	Rosecrans Avenue	AM	0.578	A	0.583	A	0.005
	and Avalon Boulevard	PM	0.761	C	0.767	C	0.006

Table 28
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Plan A Project Conditions

Int. No.	Intersection	Peak Hour	No Project (2014)		Existing With Plan A Project (2014)		
			CMA	LOS	CMA	LOS	Impact
17	Rosecrans Avenue	AM	0.743	C	0.762	C	0.019
	and Central Avenue	PM	0.752	C	0.772	C	0.020
18	Rosecrans Avenue	AM	0.844	D	0.844	D	0.000
	and Wilmington Avenue	**PM**	**0.966**	**E**	**0.972**	**E**	**0.006**
19	Compton Boulevard	AM	0.724	C	0.727	C	0.003
	and Central Avenue	PM	0.731	C	0.734	C	0.003
20	Alondra Boulevard	AM	0.695	B	0.697	B	0.002
	and Central Avenue	PM	0.858	D	0.861	D	0.003
21	Greenleaf Boulevard	AM	0.445	A	0.455	A	0.010
	and Central Avenue [2]	PM	0.479	A	0.483	A	0.004
22	Artesia Boulevard (WB)/SR-91 Freeway WB On/Off-Ramps	AM	0.808	D	0.815	D	0.007
	and Central Avenue [2]	PM	0.776	C	0.787	C	0.011
23	Artesia Boulevard (EB)/SR-91 Freeway EB On/Off-Ramps	AM	0.759	C	0.760	C	0.001
	and Central Avenue [2]	PM	0.834	D	0.845	D	0.011

Notes:

[1] City of Los Angeles intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersection unless otherwise noted.

[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.

"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997, or LADOT Traffic Study Policies and Procedures, June 2013.*

***Bold** indicates resulting intersection Level of Service E or F.*

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Existing Plus Plan A Project (Year 2014) Conditions

Significant Impact Criteria

The County's Department of Public Works and City of Los Angeles (LADOT) each determine the significance of a project's incremental traffic impacts based on a "stepped scale", with intersections exhibiting higher (worse) LOS conditions and volume-to-capacity ratios being more sensitive to additional traffic than those operating at better levels of service and with more available surplus capacity. Both the County's Department of Public Works and LADOT policies and procedures define a significant traffic impact as an incremental increase in the CMA value, resulting from project-related traffic, of 0.010 or more when the final ("with project") Level of Service is E or F, a CMA increase of 0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more at LOS C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic

increases with little effect on traffic delays. The significance criteria used to evaluate the Project's potential intersection impacts is shown in Table 29.

Table 29
Criteria for Significant Traffic Impact

LOS	Final CMA Value	Project-Related Increase in CMA Value
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
Source: Los Angeles County Department of Public Works; City of Los Angeles Department of Transportation (LADOT)		

The adjacent City of Carson, which shares jurisdiction with three of the study intersections (nos. 21 through 23) utilizes different significance criteria than that shown in Table 29. The City of Carson bases their impact evaluations on the significance definitions in the current Los Angeles County Congestion Management Program ("CMP"), which identifies that a significant impact occurs if the CMA values at an intersection increases by 0.020 or more, due to project-related traffic, but only under LOS E or F conditions. However, since these criteria are less restrictive than the County/City of Los Angeles significance criteria summarized in Table 29, no significant impacts will occur at these locations under the City of Carson impact criteria.

Plan A Project Intersection Impacts (Year 2014)

Table 28 identifies the operations at each of the study intersections before and after the development of the Project, including incremental project-related changes in CMA and/or LOS values. The potential incremental project-related effects to the current traffic conditions in the study area were then identified by comparing the existing (year 2014) "no project" conditions at each of the 23 study intersections to the anticipated "With Plan A Project" conditions. As indicated in Table 28, the incremental traffic (and its associated effects on the CMA values) resulting from the development of the Project (Plan A) is not expected to result in any changes to the existing (year 2014 "no project") operating conditions (LOS) at any of the 23 study intersections during either the AM or PM peak hours. Based on the significance criteria in Table 29, Project impacts (year 2014) would be less than significant.

Future (Year 2017) Traffic Conditions

The Project is anticipated to be completed and fully occupied by the year 2017. The "future conditions" analyses include the cumulative effects of both forecast non-project traffic growth and the Project's own traffic on area traffic operations, as well as the identification of potential project-specific impacts on the future roadway system.

Future traffic volumes in the project vicinity, and throughout the region, are anticipated to increase from the existing levels described earlier as a result of a number of factors, although two factors contribute most significantly to area traffic growth. The first of these factors is "ambient" increases in the number of vehicles on the roadway system. Based on information provided in the current (2010) Los Angeles County Congestion Management Program ("CMP"), traffic growth in the "Vernon" Regional Statistical Area ("RSA") encompassing the project and surrounding vicinity is estimated to be approximately 1.4 percent, inclusive of both general ambient growth and traffic resulting from cumulative area development (based on current or anticipated land use zoning and other demographic information for the subject RSA), through the year 2020. Therefore, for purposes of this study, an ambient traffic growth factor of 1.4 percent, compounded annually, was applied to all of the existing year 2014 traffic volumes (left-turn, through, and right-

turn) at each of the study intersections, in order to develop the "baseline" traffic volume estimates for the future year 2017 conditions. The second factor is new traffic resulting from ongoing and continued development. A review of related projects information provided by the City of Compton and the applicable surrounding jurisdictions identified a total of only four ongoing or proposed development projects within the 2.0-mile study radius (two in the City of Compton, and one each in the cities of Carson and Los Angeles; no projects were identified in the unincorporated areas of the County of Los Angeles in the project vicinity) that could result in additional future traffic at one or more of the 23 study intersections. Each of the projects is individually listed and described in Table 30 (Related Projects Descriptions and Trip Generation Estimates). The resulting related projects trip assignments are shown in Appendix K of this Draft Initial Study.

The City of Los Angeles has identified that all of the traffic signals under its jurisdiction, including the five intersections in this traffic analysis, are scheduled to be improved with LADOT's next-generation Adaptive Traffic Control System ("ATCS") signal coordination upgrades by the end of the year 2015 (this project is fully funded and is currently underway). Therefore, the ATCS improvements were assumed to be installed and operational at each of the five City of Los Angeles study locations for the analysis of the forecast future (year 2017) "without" and "with project" conditions.

Analysis of Future (Year 2017) Traffic Conditions

The 18 study intersections under the exclusive or shared jurisdiction of either the City of Compton (including the three intersections shared with the City of Carson) or the County of Los Angeles were evaluated using the County of Los Angeles Department of Public Works traffic impact analysis methodologies and guidelines, while the five intersections located exclusively under the jurisdiction of the City of Los Angeles (nos. 1, 2, 5, 13, and 14) were evaluated using the LADOT methodology. Additionally, due to the differences in the analysis scenarios and impact evaluation methodologies, for clarity, the results of the analysis of the future conditions for those intersections evaluated using the County's methodology (which includes both project-specific and cumulative traffic impacts) are summarized in Table 31 (CMA Summery Future (2017) Without and With Plan A Project Conditions-City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections), while the analysis results for the intersections that utilize LADOT's evaluation methodology (identifying only the anticipated project-specific impacts) are shown in Table 32 (CMA Summary Future (2017) Without and With Plan A Project Conditions-City of Los Angeles Intersections).

Table 30
Related Projects Descriptions and Trip Generation Estimates

Map No.	Land Use/Description	Size/Units		Address	Daily	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
City of Compton Projects											
1.	Warehouse/ Distribution Center [1]			2717 W. Rosecrans Avenue							
	Warehousing	96,770	sq. ft.		690	46	12	58	16	46	62
	Office	6,000	sq. ft.		66	8	1	9	2	7	9
	TOTAL				**756**	**54**	**13**	**67**	**18**	**53**	**71**
2.	Light Industrial	145,800	sq. ft.	East Side of McKinley Avenue, North of Rosecrans Avenue	1,289	77	94	171	57	123	180
City of Carson Projects											
3.	Bakery			320 and 354 Alondra Boulevard							
	Food Production	38,468	sq. ft.	16201-16205 Broadway Street	268	31	4	35	4	33	37
	Cold Storage	31,316	sq. ft.		111	7	2	9	2	8	10
	Industrial	*38,436*	*sq. ft.*		*268*	*31*	*4*	*35*	*4*	*33*	*37*
	TOTAL				**111**	**7**	**2**	**9**	**2**	**8**	**10**
City of Los Angeles Projects											
4.	Mixed-Use [2]			661 W. Redondo Beach Boulevard	**3,243**	**56**	**35**	**91**	**87**	**113**	**200**
	Retail	85,008	sq. ft.								
	Office	2,400	sq. ft.								

Notes:
Uses identified in italics are existing uses removed in order to develop the related project.
Trip generation estimates for projects No. 1 and No. 2 include appropriate PCE-factor adjustments for truck trips.
Sources:
[1]Traffic Impact Analysis for Goodman Logistics Center, Minigar & Associates, Inc., April 4, 2013.
[2]Traffic Impact Study for Retail Development at 661 Redondo Beach Boulevard, Los Angeles, CA, KOA Corporation, April 7, 2011.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Table 31
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan A Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing (2014)					Cumulative (2017)			Project %
			Plus Ambient (2017)		Plus Plan A Project (2017)			Plus Related Projects (2017)			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Total	
3	I-105 Freeway EB On/Off-Ramps	AM	0.724	C	0.723	C	-0.001	0.729	C	0.005	n/a [3]
	and Wilmington Avenue	PM	0.662	B	0.666	B	0.004	0.672	B	0.010	40.0%
4	120th Street/119th Street	AM	0.595	A	0.593	A	-0.002	0.595	A	0.000	n/a [3]
	and Wilmington Avenue	PM	0.622	B	0.623	B	0.001	0.624	B	0.002	50.0%
6	El Segundo Boulevard	AM	0.463	A	0.463	A	0.000	0.465	A	0.002	0.0%
	and Main Street	PM	0.542	A	0.543	A	0.001	0.543	A	0.001	100.0%
7	El Segundo Boulevard	AM	0.651	B	0.652	B	0.001	0.659	B	0.008	12.5%
	and Avalon Boulevard	PM	0.842	D	0.846	D	0.004	0.849	D	0.007	57.1%
8	El Segundo Boulevard	AM	0.891	D	0.886	D	-0.005	0.891	D	0.000	n/a [3]
	and Central Avenue	PM	0.892	D	0.895	D	0.003	**0.902**	**E**	**0.010***	30.0%
9	El Segundo Boulevard	AM	0.593	A	0.593	A	0.000	0.593	A	0.000	0.0%
	and Compton Avenue	PM	0.549	A	0.549	A	0.000	0.549	A	0.000	0.0%
10	El Segundo Boulevard	AM	0.608	B	0.607	B	-0.001	0.610	B	0.002	n/a [3]
	and Wilmington Avenue	PM	0.769	C	0.773	C	0.004	0.777	C	0.008	50.0%
11	135th Street	AM	0.334	A	0.335	A	0.001	0.339	A	0.005	20.0%
	and Avalon Boulevard	PM	0.526	A	0.528	A	0.002	0.532	A	0.006	33.3%
12	Sam Littleton Street/Stockwell Street (135th Street)	AM	0.517	A	0.516	A	-0.001	0.526	A	0.009	n/a [3]
	and Central Avenue	PM	0.594	A	0.589	A	-0.005	0.603	B	0.009	n/a [3]
15	Rosecrans Avenue	AM	0.474	A	0.477	A	0.003	0.485	A	0.011	27.3%
	and Main Street	PM	0.600	A	0.605	B	0.005	0.613	B	0.013	38.5%
16	Rosecrans Avenue	AM	0.603	B	0.607	B	0.004	0.629	B	0.026	15.4%
	and Avalon Boulevard	PM	0.793	C	0.799	C	0.006	0.827	D	0.034*	17.6%
17	Rosecrans Avenue	AM	0.775	C	0.793	C	0.018	0.820	D	0.045*	40.0%
	and Central Avenue	PM	0.785	C	0.804	D	0.019	0.822	D	0.037*	51.4%
18	Rosecrans Avenue	AM	0.879	D	0.879	D	0.000	0.897	D	0.018	0.0%

Table 31
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan A Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing (2014)					Cumulative (2017)			Project %
			Plus Ambient (2017)		Plus Plan A Project (2017)			Plus Related Projects (2017)			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Total	
	and Wilmington Avenue	PM	**1.008**	**F**	**1.012**	**F**	**0.004**	**1.024**	**F**	**0.016***	25.0%
19	Compton Boulevard	AM	0.755	C	0.757	C	0.002	0.765	C	0.010	20.0%
	and Central Avenue	PM	0.762	C	0.765	C	0.003	0.770	C	0.008	37.5%
20	Alondra Boulevard	AM	0.723	C	0.726	C	0.003	0.732	C	0.009	33.3%
	and Central Avenue	PM	0.893	D	0.897	D	0.004	**0.901**	**E**	**0.008**	50.0%
21	Greenleaf Boulevard	AM	0.464	A	0.474	A	0.010	0.481	A	0.017	53.8%
	and Central Avenue [2]	PM	0.500	A	0.503	A	0.003	0.505	A	0.005	60.0%
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps	AM	0.843	D	0.850	D	0.007	0.856	D	0.013	58.8%
	and Central Avenue [2]	PM	0.809	D	0.821	D	0.012	0.831	D	0.022*	54.5%
23	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps	AM	0.792	C	0.792	C	0.000	0.796	C	0.004	0.0%
	and Central Avenue [2]	PM	0.870	D	0.881	D	0.011	0.888	D	0.018	61.1%

Notes:
[1] Includes proposed Plan A Project and related projects.
[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
[3] Proposed project (Plan A) results in reduction in CMA value (improved intersection operations). No contribution toward cumulative impacts.
"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997.*
*Intersections with resulting Level of Service E or F are shown in **bold.***
Source: Hirsch-Green Transportation Consulting, Inc., 2014.

Table 32
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan A Project Conditions
City of Los Angeles Intersections

Int. No.	Intersection	Peak Hour	Without Project		With Plan A Project		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps and Central Avenue	AM	0.598	A	0.597	A	-0.001
		PM	0.805	D	0.807	D	0.002
2	I-105 Freeway EB On/Off-Ramps and Central Avenue	AM	0.544	A	0.540	A	-0.004

Table 32
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan A Project Conditions
City of Los Angeles Intersections

Int. No.	Intersection	Peak Hour	Without Project		With Plan A Project		
			CMA	LOS	CMA	LOS	Impact
		PM	0.495	A	0.494	A	-0.001
5	El Segundo Boulevard and Figueroa Street	AM	0.466	A	0.466	A	0.000
		PM	0.634	B	0.634	B	0.000
13	Rosecrans Avenue and I-110 Freeway SB On/Off-Ramps	AM	0.756	C	0.761	C	0.005
		PM	0.665	B	0.682	B	0.017
14	Rosecrans Avenue and I-110 Freeway NB Off-Ramp	AM	0.535	A	0.541	A	0.006
		PM	0.520	A	0.533	A	0.013

Notes:
"Without Project" condition consists of Existing plus Ambient Growth plus Related Projects traffic.
"" Indicates significant impact per LADOT Traffic Study Policies and Procedures, June 2013 (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Plan A Project Intersection Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

As shown in Table 31, operational levels of service at most of the subject study intersections are not anticipated to change substantially from the existing 2014 conditions as a result of the anticipated ambient traffic growth, with most locations forecast to operate at acceptable LOS D or better conditions during both peak hours, although the intersection of Rosecrans Avenue and Wilmington Avenue is expected to deteriorate from its current undesirable LOS E operations to LOS F during the PM peak hour (although continuing to exhibit acceptable LOS D operations during the AM peak hour). None of the other intersections evaluated using the County's analysis methodology are anticipated to operate at unacceptable (LOS E or F) conditions, although several of the intersections could experience slight reductions in their levels of service due to the expected ambient traffic increases, including Wilmington Avenue and the I-105 Freeway EB On/Off-Ramps, and Alondra Avenue and Central Avenue, both of which could be reduced from existing LOS B to LOS C conditions during the AM peak hour (remaining unchanged at LOS B and LOS D, respectively, during the PM peak hour). Similarly, the intersections of El Segundo Boulevard and Wilmington Avenue, and Rosecrans Avenue and Avalon Boulevard each could be slightly reduced from their current LOS A to LOS B operations during the AM peak hour (both remain at their existing LOS C conditions during the PM peak hour), while the intersection of 120th Street/119th Street and Wilmington Avenue is forecast to be reduced from its current LOS A to LOS B operations during the PM peak hour (remains at LOS A during the AM peak hour). Finally, the intersection of Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue is anticipated to deteriorate from its current LOS C operations to LOS D operations during the PM peak hour (remaining unchanged at its current LOS D conditions during the AM peak hour).

Once developed, the net additional traffic generated by the proposed Plan A Project will also have an effect on the operations of these study intersections. As shown in Table 30, the addition of project-related traffic is expected to result in incremental changes in the CMA values at each of the study intersections. However, such increases will be relatively nominal, and the additional

project-related trips are generally not expected to result in changes to the forecast future intersection levels of service at any of the locations under the jurisdiction of the City of Compton and/or County of Los Angeles, with the exception of the intersection of Rosecrans Avenue and Main Street, which could be slightly reduced from LOS A to LOS B during the PM peak hour by the addition of the incremental project-related traffic (remaining unchanged at LOS A during the AM peak hour), and the essentially site-adjacent intersection of Rosecrans Avenue and Central Avenue, which could deteriorate from its forecast LOS C to LOS D operations during the PM peak hour (but be unchanged at LOS C during the AM peak hour) due to the effects of project-related traffic. Nonetheless, despite these potential nominal reductions in the operational conditions (LOS) at two of the 18 intersections evaluated under the County's methodology, all but one of these locations are forecast to continue to exhibit acceptable (LOS D or better) operations even with the development of the proposed Plan A Project, with the only intersection forecast to operate at undesirable levels of service, Rosecrans Avenue and Wilmington Avenue, already exhibiting such conditions, currently (year 2014) operating at LOS E conditions during the PM peak hour. As a result, the proposed Plan A Project site development scheme is not expected to create any undesirable LOS E or LOS F conditions at any of the study intersections located within the City of Compton, County of Los Angeles, or City of Carson. Further, the incremental traffic changes resulting from the development of the proposed Plan A Project is not anticipated to result in any project-specific significant impacts at any of the intersections under the forecast future (year 2017) conditions using the County's "future conditions" analysis methodology. Therefore, no project-specific mitigation measures are warranted for any of the 18 study locations.

Plan A Project Intersection Analysis (2017) – City of Los Angeles Intersections

As shown in in Table 32 (CMA Summary Future (2017) Without and With Plan A Project Conditions-City of Los Angeles Intersections), the operational levels of service at each of the LADOT jurisdiction intersections are generally forecast to remain unchanged from their existing conditions, with the exception of the intersection of the I-105 Freeway WB On/Off-Ramps and Central Avenue, which is forecast to deteriorate slightly from its existing LOS C to LOS D operations during the PM peak hour (remaining unchanged at LOS A during the AM peak hour). However, even with this anticipated reduction in operations, each of the five subject intersections will continue to exhibit acceptable (LOS D or better) operations during both peak hours. Further, as also shown in in Table 32, the addition of the anticipated incremental Plan A Project-related traffic is not anticipated to result in changes to the forecast future "without project" conditions at any of the intersections controlled by or located within the City of Los Angeles during either the AM or PM peak hours. Additionally, the proposed Plan A Project will not result in significant impacts at any of the five City of Los Angeles intersections studied under LADOT's "future" analysis scenarios, and as a result, no project-specific mitigation measures are warranted for any of these locations.

Therefore, as shown in Tables 31 and 32, the development of the proposed Plan A Project will not result in significant Project impacts at any of the 23 study intersections (regardless of their jurisdiction), and despite slight deteriorations in the forecast levels of service at several locations, the addition of the incremental project-related traffic to the study area will not create any undesirable (LOS E or F) intersection operations in the project vicinity. As such, no project-specific mitigation measures are warranted at any of the 23 study intersections.

Cumulative (Plan A) Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

Although most of the study intersections under the jurisdiction of the City of Compton and/or County of Los Angeles are forecast to continue to exhibit acceptable operational (LOS D or better) conditions in the future following the addition of the anticipated "cumulative" traffic growth (including annual ambient growth, traffic resulting from the proposed Plan A project itself, and traffic generated by the four identified related projects), the potential additional traffic could increase the number of intersections exhibiting undesirable (LOS E or LOS F) conditions from one location (Rosecrans Avenue and Wilmington Avenue), which currently operates at LOS E during the PM peak hour) to a total of three locations, including Rosecrans Avenue and Wilmington Avenue (which is forecast to deteriorate to LOS F conditions during the PM peak hour), plus the two intersections of El Segundo Boulevard and Central Avenue, and Alondra Boulevard and Central Avenue, both of which are forecast to operate at undesirable LOS E conditions, but during the PM peak hour only.

The total additional traffic generated by the identified four "related projects" and by the proposed Plan A Project, is not generally expected to result in any changes in the operations of the subject intersections compared to the baseline forecast "With Ambient Growth" conditions. However, if the four related projects are developed as currently proposed along with the proposed Plan A Project, the combined effects of the associated additional traffic could result in a slight deterioration of the operations of the intersections of Sam Littleton Street/135th Street and Central Avenue, and Rosecrans Avenue and Main Street from LOS A to LOS B conditions during the PM peak hour (the AM conditions at both locations would remain unchanged at LOS A), while the intersections of El Segundo Boulevard and Central Avenue, and Alondra Boulevard and Central Avenue could each be reduced from acceptable "With Ambient Growth" LOS D conditions to undesirable LOS E operations, also during the PM peak hour (although the operations of these intersections would remain unaffected by the potential cumulative traffic increases, and continue to operate at acceptable LOS D and LOS C conditions, respectively, during the AM peak hour). Further, the intersection of Rosecrans Avenue and Avalon Boulevard could deteriorate from its forecast future "With Ambient Growth" LOS C operations to LOS D conditions during the PM peak hour (remaining unchanged at LOS B during the AM peak hour), while conditions at the intersection of Rosecrans Avenue and Central Avenue could be reduced from LOS C to LOS D operations during both the AM and PM peak hours by the potential cumulative traffic increases.

As shown in Table 31, the anticipated traffic additions resulting from cumulative development in the study area (including traffic generated by the four identified related projects and the proposed Plan A Project itself) could produce significant cumulative impacts at a total of five intersections located within the City of Compton or County of Los Angeles, including El Segundo Boulevard and Central Avenue, Rosecrans Avenue and Avalon Boulevard, Rosecrans Avenue and Wilmington Avenue, and Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue, each of which could be impacted during the PM peak hour only, plus the intersection of Rosecrans Avenue and Central Avenue, which is anticipated to be significantly impacted during both peak hours.

Although, as noted previously, the proposed Plan A Project itself is not expected to result in significant impacts at any of the 18 study intersections under the jurisdiction of the City of Compton and/or County of Los Angeles, it will contribute incrementally to each of the cumulative impacts to some degree. Therefore, the Plan A Project's specific "contributions" toward each of the five cumulative impacts were also identified, as a percentage of the total cumulative impact (not cumulative volumes; it is important to make this distinction, as the effects of the incremental traffic resulting from the proposed Plan A Project or from the related projects on the *operations* of

an intersection are a more definitive assessment of their associated impacts than is the number of trips). As also shown in Table 31, the proposed Plan A Project itself is estimated to contribute approximately 18 percent toward the total cumulative impact at the intersection of Rosecrans Avenue and Avalon Boulevard during the PM peak hour (when the Plan A Project's significant impact occurs), and about 25 percent of the cumulative impact at the intersection of Rosecrans Avenue and Wilmington Avenue, and about 30 percent of the cumulative impact at the intersection of El Segundo Boulevard and Central Avenue, also during the PM peak hour for both locations. Finally, the Plan A Project is estimated to be responsible for just over 50 percent of the total cumulative impact at the intersections of Rosecrans Avenue and Central Avenue (for the highest project-related impact), and Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue, once again during the PM peak hour only. Mitigation measures designed to address each of these five potential cumulative impacts are identified below, at the end of the analysis for this Initial Study question.

Supplemental Analysis (Plan A Project) – Shared City of Compton/City of Carson Intersections

Table 31 indicates that no project-specific or cumulative impacts are expected at any of the three intersections where jurisdiction is shared between the City of Compton and the City of Carson. However, the City of Carson does not use the County's project-specific/cumulative impact analysis methodologies, but rather evaluates project-related impacts on the future roadway network against the forecast "without project" scenario including traffic associated with both annual ambient growth and related projects. Therefore, in order to demonstrate the potential for cumulative impacts using the City of Carson's analysis procedures, a supplemental analysis of these three intersections was prepared. The results of this supplemental evaluation of potential Project-specific impacts at the three City of Compton/City of Carson shared jurisdiction locations are summarized in Table 33 (CMA Summary Future (2017) Without and With Plan A Project Conditions-City of Carson Intersections).

As shown in Table 33, the addition of ambient traffic growth and related projects traffic at the three subject intersections is expected to result in a deterioration of the operating levels at one of the locations compared to the existing (year 2014) conditions shown earlier in Table 28, the intersection of Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue, which is forecast to be reduced from its existing LOS C to LOS D conditions during the PM peak hour (the intersection operations remain unchanged at LOS D during the AM peak hour), although the forecast future (year 2017) "Without Project" conditions at each of the two remaining intersections of Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps and Central Avenue, and Greenleaf Boulevard and Central Avenue are expected to remain unchanged from their existing operations during both peak hours. However, despite the potential reductions in the level of service at one of the City of Carson intersections, the proposed Plan A Project will not create any new "undesirable" conditions at any of the subject locations. Application of the City of Carson's significance criteria indicates that no significant Project-related impacts will occur within its jurisdiction, and as a result, similar to the results identified in Table 32, no Project-related traffic mitigation measures are warranted.

Table 33
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan A Project Conditions
City of Carson Intersections

Int.	Intersection	Peak	Without Project		With Plan A Project		
			CMA	LOS	CMA	LOS	Impact
21	Greenleaf Boulevard and Central Avenue	AM	0.470	A	0.481	A	0.011
		PM	0.501	A	0.505	A	0.004
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue	AM	0.849	D	0.856	D	0.007
		PM	0.820	D	0.831	D	0.011
23	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps and Central Avenue	AM	0.794	C	0.796	C	0.002
		PM	0.877	D	0.888	D	0.011

Notes:
"Without Project" condition consists of Existing plus Ambient Growth plus Related Projects traffic.
""Indicates significant impact per City of Carson (Los Angeles County CMP) criteria (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Traffic Signal Warrant Analysis

As noted above, the Project includes a Project Design Feature to include two new traffic signals, to be located at the intersection of Central Avenue and 139th Street/project driveway, and at the intersection of Rosecrans Avenue and McKinley Avenue, respectively. Each of the subject locations was evaluated to determine whether it would meet any of a number of technical criteria ("warrants") generally required for consideration of installation of a new traffic signal. These evaluations utilized the signal warrant analysis methodologies identified in the current California edition of the Federal Highway Administration's ("FHWA") *Manual on Uniform Traffic Control Devices for Streets and Highways* ("CAMUTCD")[59]. The CAMUTCD identifies a total of nine warrants for use in evaluating the potential need for installation of a new traffic signal at a currently unsignalized intersection, as listed below.

- Warrant 1 – Eight-Hour Vehicular Volumes
- Warrant 2 – Four-Hour Vehicular Volumes
- Warrant 3 – Peak Hour
- Warrant 4 – Pedestrian Volumes
- Warrant 5 – School Crossing
- Warrant 6 – Coordinated Signal System
- Warrant 7 – Crash Experience
- Warrant 8 – Roadway Network
- Warrant 9 – Intersection Near a Grade Crossing

The traffic signal warrant evaluations for both locations, contained in Appendix E of the Traffic Study (refer to Appendix K of this Draft Initial Study), indicate that each of the intersections proposed for installation of new traffic signals is expected to satisfy several of the warrants (although it should also be noted that not all of the warrants listed above are necessarily

[59] *California Manual on Uniform Traffic Control Devices for Streets and Highways, 2012 Edition (FHWA's MUTCD 2009 Edition, as amended for use in California, State of California Business, Housing and Transportation Agency [and] Department of Transportation, Sacramento, California, January 13, 2012.*

applicable to each of the intersections), as summarized in Table 34 (Traffic Study Warrant Analysis Summary). Therefore, the proposed installation of new traffic signals at Central Avenue and 139th Street/project driveway, and at the intersection of Rosecrans Avenue and McKinley Avenue indicate that both are warranted, and the Project Applicant shall work with the City of Compton, the County of Los Angeles Department of Public Works and/or other cognizant jurisdictions to approve the traffic signal warrant analyses and the subsequent installation of both new traffic signals. Approval of new traffic signals at these locations shall occur before issuance of any building permits. All costs and work associated with the design and installation of each new traffic signal will be the responsibility of the Project Applicant. Finally, the new traffic signals will be designed to the satisfaction of the City of Compton, including both physical installation and signal operations. Based on preliminary input from the City, it is anticipated that each of the proposed new traffic signals will operate with exclusive ("protected") left-turn phases in one or more directions, which allow left-turns to occur only when the left-turn arrow is illuminated. Installation of the new traffic signals shall occur prior to issuance of the first project Certificate of Occupancy, including the required project-related site-adjacent roadway improvements and mitigation measures. Installation of the identified signals shall be a Condition of Approval for the Project.

In addition to controlling access into and out of the Project site, the proposed installation of a new traffic signal at the intersection of Central Avenue and 139th Street would provide enhanced access to and from the existing residential neighborhoods to the east of Central Avenue. Although it is possible that improving residential access into and out of these neighborhoods via 139th Street could result in some redistribution of the existing residential traffic in order to utilize the new signal (particularly due to the enhanced ability to turn left from 139th Street onto southbound Central Avenue), any changes in travel patterns are not expected to be substantial, primarily due to the presence of the existing traffic signal at Central Avenue and Piru Street. Since this existing signal already allows residents of the neighborhoods east of Central Avenue to make left-turns onto southbound Central Avenue during the Piru Street signal phase, large diversions of traffic from Piru Street to 139th Street are not likely, and no significant change in traffic volumes along 139th Street due to the installation of the new traffic signal are anticipated.

Table 34
Traffic Signal Warrant Analysis Summary
(CAMUTCD Guidelines for Traffic Signals)

Warrant No.	Warrant Description	Warrant Satisfied	
		Central Avenue and 139th Street/ Project Driveway	Rosecrans Avenue and McKinley Avenue
1	Eight Hour Vehicular Volume	No	**Yes**
2	Four Hour Vehicular Volume	**Yes**	**Yes**
3	Peak Hour Vehicular Volume and Approach Delay	**Yes**	**Yes**
4	Pedestrian Volume	No	No
5	School Crossing	n/a	n/a
6	Coordinated Signal System	**Yes**	No
7	Collision Experience	No Data	No Data
8	Roadway Network	No	No
9	Intersection Near a Grade Crossing	n/a	n/a

"n/a" indicates warrant not applicable to specific location.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Street Segment Traffic Impact Analysis

In addition to the evaluation of project-related impacts at the 23 signalized study intersections, an analysis of potential Project-related traffic impacts to a number of the streets serving the project site be evaluated, including both major arterial roadways (Rosecrans Avenue and Central Avenue) and local/residential streets (Sam Littleton Street and McKinley Avenue). Potential Project-related impacts on eight street segments in the project vicinity, listed below, were evaluated. These locations were selected due to their proximity to the Project Site and anticipated use as Project access routes.

1. Sam Littleton Street, between Stanford Avenue and McKinley Avenue
2. Sam Littleton Street, between McKinley Avenue and Corlett Avenue
3. Sam Littleton Street, between Corlett Avenue and Central Avenue
4. McKinley Avenue, between 136th Street and 137th Street
5. McKinley Avenue, between 139th Street and Rosecrans Avenue
6. Central Avenue, between Sam Littleton Street and El Segundo Boulevard
7. Central Avenue, between Rosecrans Avenue and Compton Boulevard
8. Rosecrans Avenue, between Stanford Avenue and Avalon Avenue

The street segment analysis was performed using methodologies similar to those described previously for the analysis of the existing and forecast conditions of the 23 study intersections. However, unlike the intersection CMA analyses, which evaluate conditions during the peak hours of the day based on the lane configurations for each of the intersection approaches, the street segment analyses compare the total two-way average daily traffic ("ADT") volumes on the roadway segments against the overall design capacity of the segment, based on the total number

of lanes in both directions (along with factors such as the provision of left-turn and/or right-turn lanes, median islands, and other geometric features).

The design capacity for each of the subject street segments evaluated in this study were estimated based on information contained in the Circulation Element of the City of Compton's Draft General Plan 2030 (dated "January 2011"). Refer to Table 13 in the Traffic Study (see Appendix K of this Draft Initial Study) for the roadway capacity by functional classification. New 24-hour automated traffic counts were performed for the selected street segments to establish the existing (year 2014) conditions along each of the selected roadways. The existing (2014) traffic volumes and future (2017) forecast traffic estimates for each of the selected street segments are shown in Table 35 (Street Traffic Impact Analysis Summary-Proposed Plan A Project), along with their associated levels of service.

As shown in Table 35, each of the street segments analyzed currently operate at acceptable LOS D or better conditions. Therefore, the existing transportation infrastructure provides sufficient capacity to accommodate the current traffic demands in the study area at acceptable operational levels.

The effects of both project-related traffic and anticipated "cumulative" traffic growth (from both annual ambient traffic increases and from the four related projects in the study area) were also examined, and the results of these evaluations are also shown in Table 34. The proposed Plan A Project will not result in any significant impacts to the area street segments under the forecast year 2017 conditions. Therefore, based on the results of this analysis, no significant Project-related impacts will occur on any of the street segments in the project vicinity, and no Project-related street segment mitigation measures are warranted.

Parking and Access

Parking Requirements and Parking Supply

Automobile Parking

Table 30-21.A in the City of Compton Zoning Code (Chapter "XXX" of the City Municipal Code) requires that most general industrial developments (including warehousing facilities such as those anticipated within the proposed Brickyard Commerce Center Project) provide on-site vehicular parking at a ratio of *"…1 square foot of parking area…for each 1 square foot of first floor gross floor area and 3 square feet of subsequent floor gross floor area, but no less than 1 space/850 square feet of gross floor area…*" (office uses comprising less than 20 percent of the total gross floor area are considered as ancillary, with no additional parking required). Based on these requirements, the Plan A Project will require a total of approximately 1,204,000 square feet of parking area, with a minimum automobile parking supply of approximately 1,765 automobile parking spaces (total for both Building A-1 and the Building A-2).

Table 35
Street Traffic Impact Analysis Summary - Proposed Plan A Project
Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service

Street/ Segment	Existing (2014)						Future (2017)						
	No Project	V/C	LOS	Project Traffic *	With Project	V/C	LOS	Without Project	V/C	LOS	With Project	V/C	LOS
Sam Littleton Street/135th Street													
Stanford Ave. to McKinley Ave. [1]	4,478	0.299	A	81	4,559	0.304	A	4,795	0.320	A	4,876	0.325	A
McKinley Ave. to Corlett Ave. [2]	3,641	0.364	A	81	3,722	0.372	A	3,942	0.394	A	4,023	0.402	A
Corlett Ave. to Central Ave. [2]	3,786	0.379	A	81	3,867	0.387	A	4,093	0.409	A	4,174	0.417	A
McKinley Ave.													
136th St. to 137th St. [2]	677	0.068	A	0	677	0.068	A	978	0.098	A	978	0.098	A
139th St. to Rosecrans Ave. [2]	1,350	0.135	A	557	1,907	0.191	A	2,817	0.282	A	3,374	0.337	A
Central Ave.													
Sam Littleton St. to El Segundo Blvd. [3]	25,529	0.851	D	123	25,652	0.855	D	26,798	0.893	D	26,921	0.897	D
Compton Blvd. to Rosecrans Ave. [4]	21,613	0.569	A	567	22,180	0.584	A	22,832	0.601	B	23,399	0.616	B
Rosecrans Ave.													
Avalon Blvd. to Stanford Ave. [5]	25,844	0.584	A	966	26,810	0.606	B	28,080	0.635	B	29,046	0.656	B

Notes:
** Net volumes for proposed Plan A Project; includes removal of existing site uses. Adjusted for PCE. Same for both "Existing" and "Future" conditions.*
[1] 2-lane Collector Roadway, assumed design capacity of 15,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[2] 2-lane Local Street, assumed design capacity of 10,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[3] 4-lane undivided Major Highway, assumed design capacity of 30,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 4-lane divided Major Highway, assumed design capacity of 38,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 6-lane undivided Major Highway, assumed design capacity of 44,250 vpd equates to 75% of maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

However, these parking ratios are intended as a general Citywide guideline for typical developments, and may not necessarily reflect the efficiencies of scale and reduced parking demands for very large facilities (such as the 1,500,000 square foot Plan A Project), and as such, may substantially overestimate the actual parking demands for such developments. As a result, alternative parking requirements or adjustments to the City's current Zoning Code were evaluated and provided for consideration relative to the specific parking needs of the Project. Therefore, the following includes the results of research related to the typical parking requirements of other jurisdictions within the region for larger industrial/warehousing uses for comparative and discussion purposes, as well as an evaluation of typical parking demand data identified in nationally-recognized sources such as ITE.

As shown in Table 36 (Parking Requirements for Various Southern California Jurisdictions), the typical parking ratios identified for the various jurisdictions result in a wide range of parking requirements for a 1,500,000 square foot distribution center facility, from a minimum of approximately 318 spaces (City of Los Angeles) to a maximum of approximately 1,500 spaces (multiple jurisdictions, including the County of Los Angeles). However, while each of the alternative parking requirements results in a lower parking requirement for the proposed Plan A Project than the City of Compton's 1,765 spaces (at 1.0 space per 850 square feet), those jurisdictions that have greater experience with large warehouse/distribution center projects or which would be most likely to consider the development of such facilities (such as the cities of Los Angeles, Moreno Valley, El Segundo, and Perris, as well as San Bernardino County) exhibit lower or variable parking ratios that recognize the efficiencies of scale regarding required parking for employee/visitors (with parking requirements for a 1,500,000 square foot warehouse/distribution center facility ranging from approximately 318 to 405 spaces), whereas jurisdictions that generally do not or would not consider such uses exhibit higher parking rates more applicable to smaller warehouse developments (resulting in excessive parking requirements of up to 1,500 parking spaces for a development similar to the proposed Plan A Project).

Therefore, based on the results of these investigations into the parking requirements of other jurisdictions in the region, a different parking standard was considered appropriate for the Project and other similar projects that would be incorporated as a text amendment to the CMC.

Accordingly, the Project includes a modified parking request pursuant to a proposed Text Amendment to the Compton Municipal Code (CMC) under consideration by the City that would allow flexible parking standards for large parking sites. The proposed Text Amendment currently under consideration by the City would permit the establishment of a Modified Parking Requirement (MPR) District under which a parking demand study would be prepared to the satisfaction of the Planning Department, and the Planning Commission would be required to find that the Project's MPR District provides adequate parking within the proposed district boundaries to meet parking demand for the facilities or uses located within the district, and that the minimum parking required based on a parking demand study is desirable to promote economic development and is in the interest of the public welfare. As an amendment to the CMC, MPR Districts could be established for projects on larger sites located anywhere in the City.

Table 36
Parking Requirements for Various Southern California Jurisdictions
Industrial/Warehouse/Distribution Facilities

Jurisdiction	Parking Ratio		Parking Requirement for a 1,500,000-square foot facility	
Cities of Culver City, Santa Monica, Manhattan Beach, Santa Ana, and County of Los Angeles	1.0[1]	/1,000 sq. ft. (total building area)	1,500	spaces
City of San Bernardino	1.0	/1,250 sq. ft. (total building area) [2]	1,200	spaces
City of Torrance	1.0	/1,500 sq. ft. (total building area)	1,000	spaces
Riverside County	1.0	/2,000 sq. ft. (total building area)	750	spaces
San Bernardino County	1.0	/1,000 sq. ft. for 1st 40,000 sq. ft.	40	spaces
	1.0	/4,000 sq. ft. above 40,000 sq. ft.	365	spaces
			405	spaces
Cities of Moreno Valley and El Segundo	1.0	/1,000 sq. ft. for 1st 20,000 sq. ft.	20	spaces
	1.0	/2,000 sq. ft. for next 20,000 sq. ft.	10	spaces
	1.0	/4,000 sq. ft. above 40,000 sq. ft.	365	spaces
			395	spaces
City of Perris [3]	1.0	/1,000 sq. ft. for 1st 20,000 sq. ft.	20	spaces
	1.0	/2,000 sq. ft. for next 20,000 sq. ft.	10	spaces
	1.0	/5,000 sq. ft. above 40,000 sq. ft.	292	spaces
			322	spaces
City of Los Angeles	2.0	/1,000 sq. ft. for 1st 10,000 sq. ft.	20	spaces
	1.0	/5,000 sq. ft. above 10,000 sq. ft.	298	spaces
			318	spaces

Notes:
[1] *Spaces*
[2] *Applicable for facilities over 50,000 sq. ft.*
[3] *High-cube warehousing uses.*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Consistent with the proposed Text Amendment currently under consideration by the City, for purposes of assessing the potential impacts of the Project related to parking, however, the anticipated parking *demands* of the facility, independent of any specific or codified parking requirements were determined. This approach utilized the current (4th Edition) of the ITE's *Parking Generation*[60] manual, which provides peak parking demand information for a variety of land uses, including "warehousing" uses (ITE Land Use 150) such as the proposed Brickyard Commerce Center Project. The *Parking Generation* manual identifies a weekday average

[60] *Parking Generation, 4th Edition, Institute of Transportation Engineers, Washington, D. C., 2010.*

parking rate for "warehousing" facilities of 0.51 spaces per 1,000 gross square feet of floor area, although it is of note that, similar to the parking requirements for the various jurisdictions shown in Table 26, the ITE's average parking demand rates also exhibit a large variation, from a minimum of 0.03 to a maximum of 1.92 spaces per 1,000 square feet, with an 85th percentile value of 0.81 spaces per 1,000 square feet. As such, it was determined that the use of the average rates, including the 85th percentile rate, would continue to introduce considerable uncertainty in the estimation of the actual number of parking spaces needed by the Project to adequately and realistically meet its anticipated parking demands.

As a result, the fitted curve equation for this land use was deemed to be the most appropriate methodology to estimate the peak parking demands associated with the Project. Based on the ITE "warehousing" parking demand fitted curve equation, the 1,500,000 square foot Project is expected to exhibit a peak vehicular parking demand of approximately 614 spaces. This value is considered to present a more reasonable estimate of the actual parking needs of the Project than any of the parking requirements identified, especially considering that the proposed Plan A Project is anticipated to conservatively employ up to approximately 500 to 600 employees in two shifts (about 250 to 300 employees per shift). While it is likely that throughout much of the day, the Project will exhibit a parking demand of only about one-half of the ITE's 614-space estimate, during shift change times, it is expected that the employees of the incoming shift will arrive prior to the departure of the previous shift, therefore effectively doubling the amount of parking needed during these brief "shift overlap" times. As a result, the estimated 614-space peak parking demand for the 1,500,000 square foot facility employing a maximum of up to 300 employees per shift is considered to be reasonable.

The Plan A development scheme proposes to provide a total of approximately 662 vehicle parking spaces, located primarily within a large surface lot containing a total of approximately 575 spaces near the center of the site, with the remaining parking located in a combination of two smaller lots, including an approximately 22-space lot adjacent to Building A-2 and an approximately 65-space lot just to the north, between the Building A-2 parking lot and the large main lot. As a result, the proposed Plan A Project will provide about 48 spaces more than the anticipated maximum demand of 614 spaces, and as such, no off-site vehicular parking impacts or Project-related parking "overflow" onto adjacent commercial streets or parking facilities, or into the adjacent residential neighborhoods resulting from insufficient on-site vehicular parking supplies are expected. Additionally, the provision of the approximately 48 "excess" parking spaces (compared to the anticipated peak demands) is anticipated to allow for the addition of temporary "seasonal" workers during peak seasonal (typically, yearend) shipping periods, without resulting in an on-site parking shortfall. Finally, all automobile parking will be provided via "standard" sized spaces (nine feet wide, 20 feet long, pursuant to the City's design requirements); no compact vehicle parking spaces are proposed.

Truck Parking/Loading Spaces

The City of Compton does not identify requirements for on-site parking for large trucks or storage for temporarily unused or "staged" trailers. However, the City of Perris, California Zoning Code (Chapter 19.69 of the Municipal Code) identifies truck/trailer parking requirements for "high-cube warehousing" facilities such as the Project at a ratio of 1.0 "oversize" space for each 5,000 square feet of gross floor area; the number of truck parking/trailer storage spaces required does not include the truck docks themselves. Since the City of Perris is the only jurisdiction identified within the Southern California region that provides specific truck parking/trailer storage requirements, these rates were applied to the Project in order to generally identify whether the number of truck parking and trailer storage spaces provided will be adequate to accommodate the anticipated needs of the facility.

Based on the proposed 1,500,000 square foot footprint of the Plan A development scheme, the application of the City of Perris truck/trailer parking space ratio would result in a requirement of a total of approximately 300 such spaces. The proposed Plan A Project will include a total of approximately 437 "container" parking spaces (which will be utilized both for truck parking and for storage of temporarily unused trailers), all located in the truck parking areas surrounding Building A-1. As such, the proposed Plan A Project will provide approximately 137 more truck parking/trailer storage spaces (approximately 46 percent more) than the number of such spaces that would be required using the City of Perris parking ratios. Further, the 437 "container" parking spaces provided by the Plan A Project equates to nearly two truck parking/trailer storage spaces for each of the approximately 219 total loading docks (208 docks in Building A-1 plus 11 docks in Building A-2) proposed (again, not including the loading docks themselves), as compared to the City of Perris requirements, which equate to only about 1.35 spaces per loading dock. Therefore, the Plan A Project is expected to provide sufficient on-site truck parking/trailer storage spaces to accommodate its anticipated demands, and no off-site parking impacts to the nearby residential or commercial areas are anticipated. Impacts would be less than significant.

Finally, as noted above, while the City of Compton does not specifically identify requirements for truck/trailer parking or storage spaces for warehousing or distribution center developments, the City's Zoning Code does require that the Project provide a total of three short-term loading spaces (for developments in excess of 50,000 square feet). While loading spaces are not specifically shown on the site plans, it is anticipated that the required loading areas will be provided at convenient locations near the entrances to both Building A-1 and Building A-2. Impacts would be less than significant.

Vehicular Driveway Access and Operations

Passenger vehicle access to the on-site parking facilities for the proposed Plan A Project scheme will be provided by two driveways, including the "full-access" driveway on Central Avenue opposite 139th Street, and the right-turn-only, entry-only driveway along Rosecrans Avenue just east of Aprilia Avenue. As also noted previously, the Project proposes to install a new traffic signal at the intersection of Central Avenue and 139th Street (which will also control the Project driveway) in order to facilitate traffic flow at this location (including both Project-related traffic and local traffic accessing the residential neighborhood located east of Central Avenue); the proposed new Rosecrans Avenue driveway will not be signalized (no exits will be permitted at this location). The Project shall also reconstruct the entire pavement on McKinley Avenue from Rosecrans Avenue to Sam Littleton Street to the satisfaction of the City of Compton and the Los Angeles County Department of Public Works. The Plan A Project also includes an emergency vehicle-only driveway on Central Avenue opposite Piru Street, and although this intersection is currently signalized, the site driveway will be gated and will not be used for automobile or truck access under the Plan A Project scheme.

Although all of the on-site passenger vehicle parking areas (including the "main" parking lot located near the center of the site, and the various smaller lots at or surrounding Building A-2) can be accessed from either of these two driveways, it is anticipated that, since most of the Project's employees, as well as visitors to the site, will park in the larger "main" parking lot, most of the entering passenger vehicles are expected to utilize the driveway at Central Avenue opposite 139th Street (since it provides direct entry and exit to the "main" parking lot), with the remaining vehicles entering at the Rosecrans Avenue driveway. However, due to the previously-described entry-only access restrictions proposed for the operations of the Project's new Rosecrans Avenue driveway, any passenger vehicles entering the Project site from that location will be required to exit the site via the driveway located on Central Avenue opposite 139th Street.

Truck access for the Plan A development scheme will be provided at a total of three locations, including the previously described "full-access" driveway on Central Avenue at 139th Street and the entry-only driveway located along Rosecrans Avenue, both of which will also be shared with passenger vehicles. Trucks using the Central Avenue driveway will be restricted to entry from or exit to the south along Central Avenue (via left-turn-only entry and right-turn-only exit turning movements) in order to eliminate Project-related truck traffic on Central Avenue north of the site (although passenger vehicles will be allowed full access into and out of this driveway). A third driveway, which will provide "truck-only" access, will be located on McKinley Avenue approximately opposite 138th Street; similar to the truck turning prohibitions proposed for the Project driveway on Central Avenue opposite 139th Street, the McKinley Avenue driveway will be designed and constructed such that only right-turn entry and left-turn exit movements will be allowed, in order to eliminate Project-related truck traffic from traveling along McKinley Avenue to the north of this driveway (to or from Sam Littleton Street).

Trucks entering the Central Avenue driveway will either utilize a short access road to enter the Building A-1 site, or will continue along the south side of the "main" passenger vehicle parking lot to the north-south internal access road leading to Building A-2 near the southern end of the Project site. Trucks exiting from the Building A-1 facility will have the option of exiting via either the Central Avenue driveway (at 139th Street) or the McKinley Avenue driveway, while trucks accessing Building A-2 will likely exit from the Central Avenue driveway (no exits are allowed at the Rosecrans Avenue driveway south of Building A-2), since exiting from the McKinley Avenue "truck-only" driveway presents a circuitous route through the Project site. Trucks entering the site at the right-turn entry-only driveway on Rosecrans Avenue can directly access Building A-2, or can continue north along the internal access road to Building A-1, and exit the site in a similar manner to that described for trucks entering from Central Avenue. Finally, trucks entering the McKinley Avenue driveway are provided direct access to Building A-1, and can exit the site via either the McKinley Avenue or Central Avenue driveways.

Vehicular access into or out of any of the proposed Plan A Project driveways is not expected to present any specific difficulties or other access issues for either passenger vehicles or trucks. Central Avenue currently exhibits a (painted) median two-way left-turn lane along the entire Project frontage. Additionally, this intersection, which is currently STOP sign controlled along the 139th Street (westbound) approach to Central Avenue (Central Avenue traffic does not stop), is proposed to be signalized as a feature of the Project's development, further enhancing access to and from the Project site. The site's Rosecrans Avenue driveway will be restricted to right-turn-only, entry-only operations, due primarily to its location near the existing signalized intersection of Rosecrans Avenue and Aprilia Avenue (which also includes the Sares Regis Building driveway on the north side of Rosecrans Avenue); this signal is expected to create typical (short duration) vehicular queuing that would inhibit the ability of Project-related vehicles (particularly trucks) to exit onto either direction of Rosecrans Avenue. This location is also adjacent to an existing, left-turn lane for westbound Rosecrans Avenue, which extends eastward past the proposed location of the Project driveway, preventing eastbound vehicles from turning left into the driveway. As a result, since there would be no outbound traffic from this Project driveway, and entry will be restricted to right-turn-only moves (no eastbound left-turns across westbound traffic lanes will be allowed), no substantial access conflicts are expected at this driveway location. Further, although the Project's McKinley Avenue "truck-only" driveway will not be signalized, due to the proposed right-turn entry/left-turn exit restrictions and relatively light traffic volumes on McKinley Avenue, no substantial congestion at this driveway is anticipated. Finally, the Project proposes to reconstruct the entire pavement on McKinley Avenue from Rosecrans Avenue to Sam Littleton Street and install a new traffic signal at the intersection of McKinley Avenue and Rosecrans Avenue, which is expected to further enhance truck-related access to and from the McKinley Avenue driveway.

Therefore, the combination of new left-turn channelization, new traffic signals, and/or other operational conditions or restrictions proposed for the Project's driveways will simplify ingress or egress at each of the individual driveways, and will eliminate or minimize potential conflicts with traffic on the site-adjacent streets, and as a result, there are no substantial concerns regarding the proposed Plan A Project overall vehicular (automobile and truck traffic) access scheme, including the proposed driveway locations or access (turning movement) operations. However, to assure that the Plan A Project will provide sufficient entry and exit capacity to accommodate the highest vehicular demands expected during the critical AM and PM peak hours, this component of each of the site's proposed driveways were analyzed in more detail.

The number of trips anticipated at each of the Project driveways during these time periods was identified based on the Project's trip type (passenger vehicle or truck) identified earlier in Table 23, and the individual Project trip assignment percentages (total passenger vehicles, and Buildings A-1 and A-2 trucks) shown earlier in Figures 20 through 22. However, note that the driveway volume estimates do not include reductions for the removal of trips generated by the existing site development, since the site driveways must be able to accommodate all of the Project's anticipated traffic, not just the "net", or incremental, site-related trips that were used to evaluate the effects of the Project at the study intersections and on the area roadway system. Further, the Project's truck volumes at the driveways were not adjusted with the PCE factors, as was done for the calculation of Project traffic at each of the 23 study intersections, in order to identify the actual number of vehicles entering and exiting each location. Therefore, based on these assumptions, the anticipated Project-only traffic volumes at each of the proposed Plan A Project site driveways were identified.

The proposed Plan A Project is expected to exhibit "driveway" volumes of approximately 165 total trips (114 inbound, 51 outbound) during the AM peak hour, including 131 passenger vehicle trips (99 inbound, 32 outbound) and 34 truck trips (15 inbound, 19 outbound), while during the PM peak hour, a total of approximately 180 trips (55 inbound, 125 outbound) are anticipated to access the Project site, including 143 passenger vehicle trips (37 inbound, 106 outbound) and 37 truck trips (18 inbound, 19 outbound). Individually, the site's driveway on Central Avenue (at 139th Street) is expected to accommodate a total of 134 trips (including inbound volumes of 84 passenger vehicle trips and 10 truck trips, and outbound volumes of 32 passenger vehicle trips and eight truck trips) during the AM peak hour, and a total of 157 trips (inbound volumes of 31 passenger vehicle trips and 12 truck trips, and outbound volumes of 106 passenger vehicle trips and eight truck trips) during the PM peak hour. The entry-only driveway on Rosecrans Avenue is expected to exhibit total vehicular demands of approximately 16 (inbound only) trips (15 passenger vehicle trips and one truck trip) during the AM peak hour, and seven (inbound only) trips (six passenger vehicle trips and one truck trip) during the PM peak hour, while the remaining (truck-only) driveway on McKinley Avenue is expected to exhibit a total demand of approximately 15 truck trips (four inbound, 11 outbound) during the AM peak hour, and approximately 16 truck trips (five inbound, 11 outbound) during the PM peak hour. The Project's proposed driveway on Central Avenue opposite Piru Street will be used only as access for emergency vehicles.

None of the Project driveways are currently anticipated to be equipped with any type of vehicular access control devices, such as ticket dispenser/gate arm controls and/or manned kiosks, at the driveway/street interfaces, although a number of security gates are located internal to the Project site to control and monitor Project-related passenger vehicle and truck traffic within the site itself and to and from the various on-site parking areas; the nearest of these internal security gates to any of the site's driveways is at the truck-only driveway on McKinley Avenue, with a gate/guard kiosk located approximately 143 feet internal to the site from the property line. Note also that an access control gate is located at the Project driveway on Central Avenue opposite Piru Street,

approximately 65 feet internal to the site from the street, although as described earlier, this driveway will operate as an emergency vehicle-only access, and will not be utilized for passenger vehicle or truck access under the Plan A Project development scheme. Finally, vehicular access at the Project driveway on Central Avenue opposite 139th Street will be controlled by the proposed new traffic signal at that location, while the Rosecrans Avenue right-turn entry-only driveway will be uncontrolled.

Uncontrolled access locations such as the proposed Rosecrans Avenue driveway typically provide entry capacities of between 750 to 1,000 vehicles per hour per lane, depending on the internal configuration of the parking area accessed by the driveway; since this driveway will provide access to a direct (straight) internal roadway, it is assumed that this one-lane entry-only driveway will exhibit an entry capacity at or near the maximum value of 1,000 vehicles per hour. A review of the peak hour traffic volumes at this driveway indicates that its capacity will far exceed the expected demands, and therefore, no significant Project-related vehicular queuing or impacts to traffic flows on Rosecrans Avenue are expected.

Entry and exit capacities for manned security gate controlled driveways such as the one serving the Project's truck-only driveway on McKinley Avenue can vary significantly depending on the configuration, level of security, and other factors. It was conservatively assumed that such gates would exhibit a relatively low entry capacity of approximately 60 vehicles per hour per lane (approximately one vehicle per minute per lane) due to the time necessary to conduct any necessary security reviews or procedures. Exiting capacity at this driveway is expected to be considerably higher, since all trucks leaving the site will have already completed any security clearances, and therefore, they would only need to wait for the security gate to be opened; such operations typically exhibit exit capacities of between approximately 200 and 400 vehicles per hour per lane. However, it should be noted that, although the physical operation of the gate mechanism itself does have some bearing on the exit capacities of driveways so equipped, the amount of traffic that can actually exit a driveway during any particular time period is more dependent upon the volume of traffic and/or congestion levels on the street itself, as these factors generally control the number of vehicles that can enter into the traffic flow on the street accessed by the driveway. McKinley Avenue adjacent to the Project site (between Sam Littleton Street and Rosecrans Avenue) currently accommodates a total maximum traffic demand (both directions) of between approximately 90 and 120 vehicles per hour during both the AM and PM peak hours. These relatively low levels of on-street traffic are not expected to impede truck traffic exiting from the McKinley Avenue driveway, although in order to provide a conservative assessment of the operations of this access location, for purposes of this study, the exit capacity was assumed to be near the middle of its range, at approximately 300 vehicles per hour. Again, a review of the peak hour truck traffic volumes utilizing this driveway indicates that its assumed minimum entry and exit capacities described above are substantially higher than the expected truck traffic demands, and no significant Project-related impacts to traffic operations along McKinley Avenue due to this truck-only driveway are anticipated.

The approximately 143-foot on-site vehicular queuing distance between the security gate at the McKinley Avenue driveway and the street itself is expected to be adequate to accommodate the anticipated truck traffic at this entrance without creating queuing out of the project site and onto McKinley Avenue. Truck traffic associated with Building A-2 is not expected to use the McKinley Avenue driveway since no direct internal (on-site) site access between Building A-2 and the McKinley Avenue driveway is provided. As indicated earlier in the Plan A project trip generation calculations, Building A-1 generates a total of approximately 491 truck trips per day (83 2-axle, 111 3-axle, and 297 4-axle or larger trucks), with approximately one-half of these trips inbound to the site and the remainder exiting the site. Additionally, Building A-1 is expected to generate a total of approximately 14 inbound (entering) trucks (vehicles) during the AM peak hour, and a

total of approximately 17 inbound trucks during the PM peak hour. Therefore, based on these anticipated inbound truck trip generation levels, and the Building A-1 truck traffic assignment assumptions noted earlier, the McKinley Avenue driveway is expected to exhibit a total of approximately 74 entering trucks per day (one-half of the total 491 daily inbound truck trips, or approximately 246 inbound trucks, times 30 percent using the McKinley Avenue driveway), including four trucks entering during the AM peak hour and five trucks entering during the PM peak hour.

These values represent an average arrival rate of approximately three arriving trucks per hour over a 24-hour period (74 entering trucks per day divided by 24 hours), or about one truck every 20 minutes, with average peak hour arrival rates of approximately one truck every 15 minutes during the AM peak hour and approximately every 12 minutes during the PM peak hour. However, for purposes of evaluating whether the approximately 143-foot on-site queuing length would be adequate to accommodate the anticipated truck traffic, it was assumed as a "worst case" condition that the peak truck arrival rate at the Plan A project's McKinley Avenue driveway during any one-hour period of the day would be approximately twice the average arrival rate. Therefore, the maximum truck arrival loading for the McKinley Avenue driveway is expected to be approximately 10 trucks per hour (based on the PM peak hour average arrival rate), or about one truck entering the driveway every six minutes. This interval between arriving trucks will provide more than adequate time for a waiting truck to clear the security gate before another truck arrives, minimizing the potential for truck queuing at this location and queuing out of the site onto McKinley Avenue. It should also be noted that even if two semi-trailer trucks were to arrive at the McKinley Avenue driveway at the same time, the approximately 143-foot distance between the security gate and the project's property line at McKinley Avenue would allow for both trucks, each assumed to be approximately 65-feet in length, to queue completely on site without encroaching onto McKinley Avenue. As such, the proposed location of the security gate at the McKinley Avenue truck-only access driveway for the Plan A project development scheme is expected to be adequate, and no impacts to McKinley Avenue traffic flows are anticipated.

As identified previously, the Project driveway along Central Avenue opposite 139th Street will be controlled by a new traffic signal proposed to be installed as part of the development of the Project. The lane capacities of signal-controlled intersections (including driveways) are substantially higher than at either uncontrolled or gate-controlled driveways, at between approximately 1,200 and 1,500 vehicles per hour per lane. However, as is typically the case for driveways providing the fourth approach to an intersection controlled by traffic signals, it is possible that the driveway exit lanes themselves could exhibit a "flashing red" indication during the 139th Street westbound "green" phase, allowing vehicles to exit the Project driveway, but allowing the 139th Street traffic the right-of-way. In such instances, the exit lane capacities are somewhat reduced, to between approximately 850 and 1,000 vehicles per hour, although the entry lane capacities (including the northbound left-turn lanes) controlled by the signal will continue to exhibit their typical capacities of between 1,200 and 1,500 vehicles per hour regardless of whether the driveway exit lanes exhibit a "flashing red" or "green" indication. Nonetheless, the anticipated Project entry and exit traffic volumes at this driveway will be substantially lower than the entry or exit capacity of the proposed (signalized) driveway, and again, no significant access impacts are expected at this location. If the existing traffic signal at the intersection of Central Avenue and Piru Street is modified to also control the proposed emergency vehicle-only driveway opposite Piru Street, that driveway would exhibit similar operations and entry/exit capacities, to that described above, although no Project-related traffic will use this driveway under the Plan A development scheme.

Finally, left-turn demands at the site driveways were reviewed to assure that adequate vehicular queuing capacity (left-turn lane lengths) are provided so that left-turning vehicles entering the

Project site do not "spill out" into the adjacent through lanes and impact traffic flows on any of the site-adjacent streets. A review of the Project site and proposed access locations indicates that there is only one location where vehicles will make left turns into the site, at the driveway on Central Avenue opposite 139th Street (although left turns could occur at the Central Avenue driveway opposite Piru Street, this location will be used for emergency vehicle access since it would not provide direct access to any of the automobile parking lots, and left-turn capacity at this location is not an issue for the Plan A Project). No entering left turns will occur at either the Rosecrans Avenue driveway or the McKinley Avenue truck-only driveway, both of which will be restricted to right-turn-only entry movements. Therefore, the anticipated (northbound) left-turning volumes into the Project driveway on Central Avenue at 139th Street are expected to be approximately 59 total vehicles (including 49 passenger vehicles and 10 trucks) during the AM peak hour, and a total of approximately 30 vehicles (18 passenger vehicles and 12 trucks) during the PM peak hour.

Assuming a cycle length for the new traffic signal at Central Avenue and 139th Street of approximately 90 seconds, and further assuming a peak vehicular arrival rate of approximately 150 percent of the average (hourly) arrival rate, it is estimated that the northbound left-turn lane could exhibit a potential maximum demand (and associated vehicular queue) of approximately three vehicles per cycle (two passenger vehicles and one truck), during the AM peak hour, although conditions during the PM peak hour will be similar. A three-vehicle queue consisting of two passenger vehicles, assumed to be full-size vehicles at approximately 20 feet in length, plus one truck, assumed for worst case evaluation purposes to be a semi-trailer truck at approximately 65 feet in length, a left-turn lane length of approximately 105 feet would be needed to accommodate these demands without the last vehicle in the queue encroaching into the northbound through lanes on Central Avenue, although it is recommended that a 25 percent "safety factor" also be incorporated, increasing the overall length of the left-turn lane itself (without striping transitions) to approximately 135 feet (rounded up to the nearest 5 feet), Finally, the provision of an approximately 60-foot reverse curve striping transition between the new left-turn pocket and the existing median two-way left-turn lane would result in a total length for the proposed new northbound left-turn lane of approximately 195 feet.

However, due to the anticipated operations of the proposed project, much of the passenger vehicle (automobile) traffic generated by the facility is expected to occur outside the typical AM or PM peak commute traffic periods, as evaluated in the preceding discussion. Therefore, the length of the proposed new left-turn lane necessary to accommodate the project's traffic demands during the worker shift change periods was also evaluated in order to assure that adequate vehicular queuing capacity will be provided during all times of the day. Since the Project's trip generation calculations do not include estimates of the potential traffic that could occur during the work shift changes, additional calculations were conducted to determine these values.

As identified previously, the Project anticipates an employment level of between approximately 250 and 300 employees per work shift; for purposes of this evaluation, the higher employment level of 300 employees was used. The number of vehicles associated with these employees was estimated by assuming an average vehicle occupancy ("AVO") of approximately 1.20 persons per vehicle, which is typical of conditions in the Southern California region, resulting in a total of approximately 250 employee-related vehicles per shift. Based on these estimates, each of the work shift change periods would therefore be anticipated to result in a maximum of approximately 250 inbound and 250 outbound trips.

Approximately 85 percent of the proposed Plan A project's passenger vehicle trips are anticipated to enter the project site via the new driveway on Central Avenue opposite 139th Street, with approximately 50 percent (of the total trips) accessing the site via the new northbound left-turn

lane. Therefore, based on the assumed total of approximately 250 inbound passenger vehicles per shift change, the proposed left-turn lane would exhibit a maximum vehicular demand of approximately 125 vehicles per hour. Further assuming that approximately 65 percent of these vehicles arrive during the half-hour period immediately prior to the start of the incoming shift results in a peak vehicle arrival rate of about 81 passenger vehicles during the peak 30-minute employee arrival period.

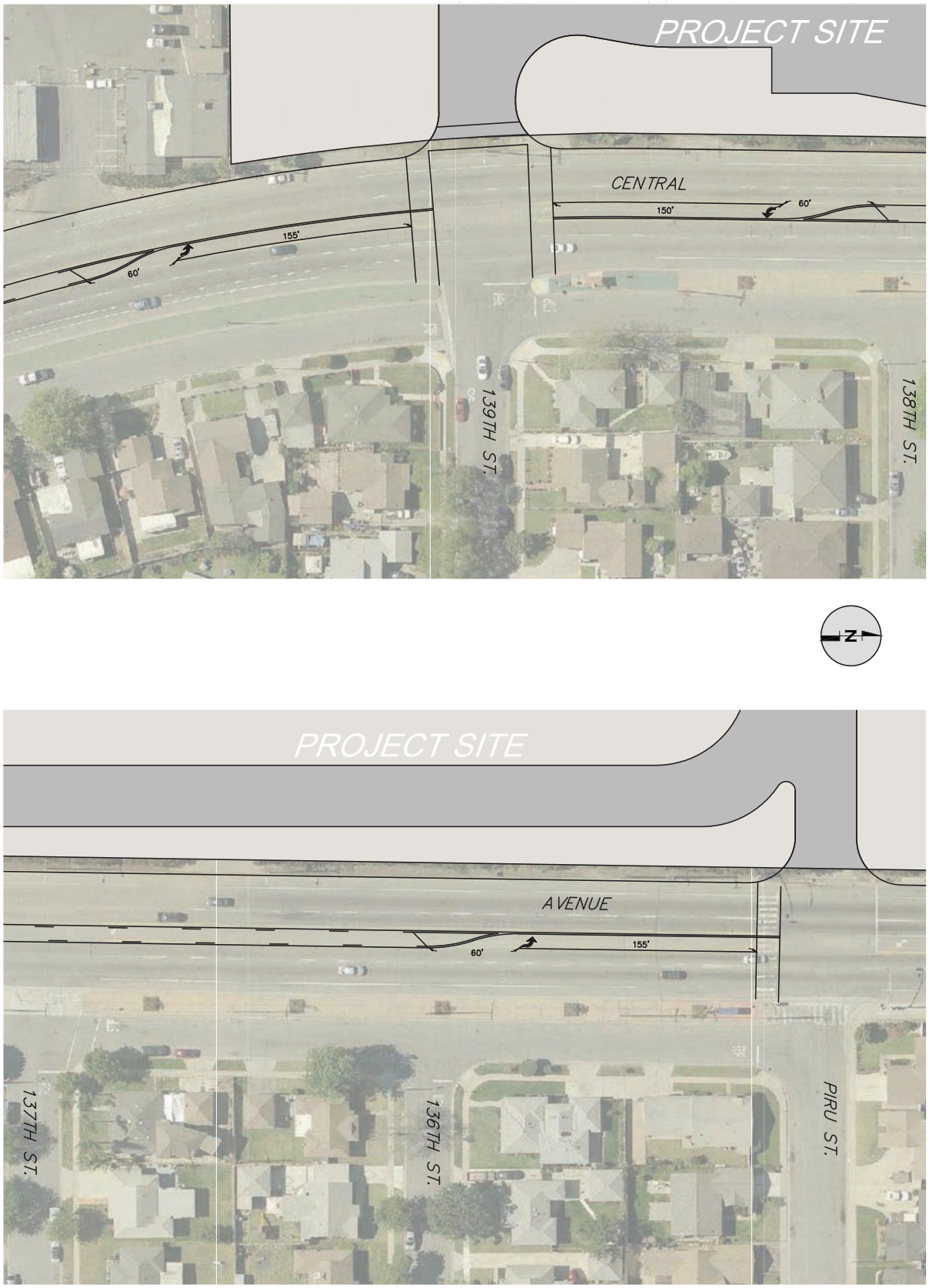
Truck-related traffic accessing the project site during the work shift change periods is not expected to be substantially different from that anticipated during the AM or PM peak hours, since as described previously, truck traffic associated with the proposed development occurs relatively consistently throughout the day, and is not tied directly to the shift change periods. Therefore, as identified previously, for purposes of evaluating the appropriate length of the proposed new northbound left-turn lane, it is assumed that one (semi-trailer) truck would also enter the project site using the new left-turn lane during the work shift change periods.

Although the new traffic signal at the Central Avenue/139th Street project driveway has not yet been designed, as noted earlier, it is anticipated that, in order to provide adequate progression for traffic on Central Avenue, it would exhibit an approximately 90-second total cycle length, which is consistent with the operations of other existing traffic signals in the project vicinity. This assumed signal operation would provide a total of approximately 40 signal cycles per hour (3,600 seconds per hour divided by 90-second signal cycle length), or about 20 signal cycles during the peak 30-minute shift change employee arrival period.

Based on the peak arrival rate of about 81 passenger vehicles, the proposed new northbound left-turn lane would exhibit a demand of about four passenger vehicles and one semi-trailer truck per signal cycle during the work shift change periods. Vehicle length of approximately 20 feet for each of the four passenger vehicles and 65 feet for the one semi-trailer truck results in an initial left-turn lane length of approximately 145 feet, with the 25 percent "safety factor" further increasing the length of the left-turn lane itself to approximately 180 feet.

Finally, the 60-foot reverse curve striping transition would result in a total length of approximately 240 feet for the proposed northbound left-turn lane. Therefore, since this length is more than the approximately 195-foot left-turn length necessary to accommodate the project's anticipated peak hour traffic, the more conservative 240-foot left-turn lane length is recommended.

A conceptual design for the proposed left-turn lane at the Project's driveway on Central Avenue opposite 139th Street is shown in Figure 25 (Conceptual Improvement Central Avenue), along with a somewhat shorted left-turn pocket at the emergency vehicle-only driveway on Central Avenue at Piru Street. As identified in this figure, the proposed new northbound left-turn lane at the Project driveway on Central Avenue opposite 139th Street can generally be provided without obstructing access to or from the existing bus maintenance yard driveway on the west side of Central Avenue immediately south of the Project site, although vehicles entering or exiting the bus maintenance yard driveway would do so across the 60-foot reverse curve transition striping. However, this situation could be eliminated by leaving the end of the northbound left-turn pocket "open" (rather than "closed" by the transition striping). This modification to the proposed left-turn pocket striping would allow vehicles to enter and exit the bus maintenance yard from the existing two-way left-turn lane, as is the current condition. Further, the "open-ended" left-turn lane would permit project-related traffic to extend past the actual left-turn pocket if necessary (should unanticipated conditions result in vehicle queues that temporarily exceed the expected queue lengths described earlier). Such "open-ended" left-turn pockets are common throughout the



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

region, and operate acceptably with no significant safety or operational concerns; the alternative "open-ended" left-turn lane striping for the project driveway at 139th Street is also shown in Figure 25.

Similarly, although not proposed as part of the Plan A project, a new northbound left-turn lane could be installed at the proposed Plan A emergency-vehicle only access driveway on Central Avenue opposite Piru Street without interfering with access to or from 137th Street (the closest intersection along Central Avenue south of Piru Street). Since this access is only intended for emergency vehicle access under the Plan A project, and there is an existing median two-way left-turn lane from which northbound vehicles could turn into the site driveway if needed, there is no particular circumstance that would require the new left-turn lane under the Plan A development scheme, it has been shown only since both the Plan A and Plan B projects are being considered concurrently, and the Plan B project would need the new left-turn lane. Therefore, it was included as a possible improvement for Plan A as well. The proposed northbound left-turn lane at Central Avenue and Piru Street is not expected to require the same length as the left-turn lane at the project driveway on Central Avenue opposite 139th Street discussed earlier, since it serves only as an emergency-vehicle access location for the Plan A site development scheme. Additionally, as described in detail later in this report, project-related traffic accessing this driveway under the Plan B site development scheme, which will be limited to passenger vehicle traffic only (no truck traffic), will be less than that expected at the Plan A Central Avenue/139th Street driveway, even during the work shift change periods, due primarily to the reconfiguration of the project's buildings and parking areas, and the provision of additional site driveways along Sam Littleton Street for

the Plan B project. Nonetheless, as shown in Figure 25, since there are no driveways or side street intersections in the immediate vicinity of the project driveway on Central Avenue opposite Piru Street, a new northbound left-turn lane at that location could provide for additional length beyond that shown.

Therefore, new northbound left-turn lanes to enhance access to each of the two Plan A project's proposed driveways on Central Avenue (including the emergency-vehicle only access driveway opposite Piru Street) can be designed to provide sufficient vehicle storage length to ensure that the Plan A project's anticipated peak vehicular queues (during the work shift change periods) will not encroach into the northbound through lanes on Central Avenue, and their installation would not generally obstruct access to any other existing streets or driveways in the immediate project vicinity. As a result, no significant left-turn access impacts are expected.

Internal (On-Site) Vehicular Circulation

The internal (on-site) vehicular circulation for the Plan A Project site was reviewed to assure that all vehicles, and particularly semi-trailer trucks, can adequately access all necessary areas of the site without difficulty. The Plan A Project provides several on-site passenger vehicle parking areas located in the center of the site (south of Building A-1) or adjacent to or near Building A-2; passenger vehicle access to and from these parking areas is adequate, and no significant issues of concern were identified. Additionally, semi-trailer truck travel paths at or through the most critical "choke points" within the site (such as into or out of the Project site access driveways, or circulating within the site between Building A-1 and Building A-2) were reviewed. The vehicular circulation scheme for the Plan A Project has been designed to accommodate semi-trailer truck movements at all critical locations within the Project site, as well as into and out of the Project site at each of the applicable truck access driveways, without issue. Therefore, the proposed Plan A Project site plan adequately provides for both passenger vehicle and semi-trailer truck (as well as for smaller single-unit trucks) site access and internal circulation, and no significant issues in this regard are anticipated.

Roadway Improvements

In addition to the development of the on-site facilities for the proposed Plan A Project, a number of modifications to the existing roadway facilities fronting the Project site, including but not limited to dedications, widenings, landscaping, and installation of sidewalks, will also be implemented. The City of Compton requires that development projects within its jurisdiction improve the roadways and other transportation facilities adjacent to their respective sites to the rights-of-way and street widths appropriate to each street's classification, and based on information provided by the City, the following roadway improvements will be required of the Project.

The City of Compton and the County of Los Angeles, Department of Public Works have identifieds that McKinley Avenue ~~should~~ shall be improved to provide a total right-of-way dedication of 60 feet improved with a total roadway of 40 feet, or a half-roadway width of 20 feet within a 30-foot half right-of-way. Therefore, the Project will be required to provide a variable right-of-way dedication of between 13.5 feet (south of the existing right-of-way "jog" and 30 feet (north of the "jog"), along with the construction of a new 20-foot wide half-roadway along the entire project frontage of McKinley Avenue, in order to bring this street to its full design standards, and to provide a consistent roadway width along McKinley Avenue throughout its length between Rosecrans Avenue on the south and Sam Littleton Street on the north. The reconstruction of the pavement shall include the westerly side of McKinley Avenue within the County of Los Angeles jurisdiction to accommodate truck traffic on McKinley Avenue south of 138th Street, and automobile traffic on McKinley Avenue between Rosecrans Avenue and Sam Littleton Street.

Additionally, although not immediately adjacent to the Project site, the City ~~has indicated that it~~ will require that the Brickyard Commerce Center improve the segment of McKinley Avenue south of the project site, between approximately 138th Street and Rosecrans Avenue, to accommodate the anticipated truck traffic using this roadway to access the project's proposed McKinley Avenue driveway. As noted, the reconstruction of the pavement shall include the westerly side of McKinley Avenue within the County of Los Angeles jurisdiction to accommodate truck traffic on McKinley Avenue south of 138th Street, and automobile traffic on McKinley Avenue between Rosecrans Avenue and Sam Littleton Street.~~, including potential reconstruction of the roadway sub-base and new paving and striping.~~

The City will require that the Project improve Sam Littleton Street to provide a total right-of-way dedication of 80 feet, improved with a total roadway of 56 feet, or a half-roadway width of 28 feet within a 40-foot half right-of-way. Therefore, the Project will be required to provide a variable right-of-way dedication of between 25 and 40 feet along its frontage (south side) of Sam Littleton Street, from McKinley Avenue to Central Avenue, in order to complete the required street dedications. The City's design standards for Sam Littleton Street (i.e., a 28-foot half roadway along the project frontage) is consistent with the segment of this street immediately west of McKinley Avenue (within the jurisdiction of the County of Los Angeles), which currently exhibits a half-street width of approximately 28 feet.

However, in addition to the required/recommended roadway improvements along the frontage of Sam Littleton Street, the City has expressed concerns related to traffic speeds along the newly widened portion of the roadway. The segment of Sam Littleton Street west of McKinley Avenue, called 135th Street, is located within the County of Los Angeles, and is designated as a Collector Roadway, a "higher" classification than the Local Street classification of Sam Littleton Street within the City of Compton. As such, the portions of 135th Street west of McKinley Avenue are designed and intended to carry higher levels of traffic at higher speeds than are Local Streets, and as such, the City of Compton is seeking ways of controlling traffic speeds along Sam Littleton Street adjacent to the Project site and the residential neighborhoods to the north.

Based on the anticipated future roadway configuration and operations along this segment of Sam Littleton Street (described in detail later in this study), the Project would create a new three-way STOP sign controlled intersection at Sam Littleton Street and Corlett Avenue, by installing new STOP signs on each of the approaches of this currently uncontrolled intersection. Corlett Avenue is located approximately half way between the all-way STOP sign controlled intersection of Sam Littleton Street and McKinley Avenue (850 feet to the west), and the signalized intersection of Sam Littleton Street and Central Avenue (1,000 feet to the east), and requiring Sam Littleton Street traffic to stop at this intersection is expected to be the most effective means of reducing speeds along this segment of the roadway. This measure will also provide improved access between Sam Littleton Street and Corlett Avenue for residents of the neighborhoods to the north the Project site, minimizing or eliminating any potential additional access delays that could occur due to anticipated future traffic increases on Sam Littleton Street (including both Project-related and non-project traffic growth.

However, the City has also expressed concerns that the lengths of Sam Littleton Street between McKinley Avenue and the proposed new STOP-sign controlled intersection at Corlett Avenue (approximately 850 feet), and between Corlett Avenue and Central Avenue (approximately 1,000 feet) would still be sufficient for vehicles to attain speeds that would be considered to be inappropriate for this facility. Therefore, in addition to the new STOP signs to be installed on all approaches of the intersection of Sam Littleton Street and Corlett Avenue, the project applicant also proposes the installation of new radar-actuated speed warning signs for both directions of Sam Littleton Street between McKinley Avenue and Central Avenue, in order to provide additional, passive traffic speed enforcement along the project frontage portions of this street.

Other measures were also considered to control traffic speeds along this segment of Sam Littleton Street, including physical roadway modifications such as “bulb outs” at the intersections with McKinley Avenue and Corlett Avenue or at other mid-block locations along the street (which would extend the curb line for short segments of the street to narrow the actual roadway width and create the perception of “side friction” for drivers, which can result in reduced travel speeds), and/or the installation of speed humps (which also act to slow traffic speeds). However, “intrusions” into the typical roadway width such as curb “bulb outs” along an otherwise “typical” street could present drivers with unexpected obstacles that could create safety concerns such as collisions with the “bulb outs” or drivers swerving to avoid perceived collisions with these roadway-encroaching measures. Consequently, the installation of such physical, permanent reductions of the roadway width of Sam Littleton Street are considered to be unnecessary at this time pending the installation and evaluation of the effectiveness of the proposed STOP signs and speed monitoring signage. Additionally, the installation of speed humps along the project frontage of Sam Littleton Street would likely create additional noise effects that could impact the residential neighborhoods bordering this street on the north, as well as create impediments to emergency vehicle access and travel (especially for fire trucks, ambulances, and other large vehicles). Therefore, the installation of additional speed control measures beyond those recommended were determined not to be appropriate at this time.

Finally, as noted earlier, as a feature of its development, the Project is proposing to install new traffic signals at its “primary” driveway on Central Avenue (at 139th Street), and at the intersection of Rosecrans Avenue and McKinley Avenue. The installation of these proposed new traffic signals was evaluated individually for each location in order to determine whether either of these locations would meet a variety of minimum criteria (“warrants”), using the procedures described in the California Manual on Uniform Traffic Control Devices (“MUTCD”).

Plan B Project Analysis

Construction Traffic

During construction, the Project could include excavation and export or import of up to 30,000 cubic yards of dirt. It is expected that the haul activities would utilize 14 cubic yard capacity trucks, with peak activity of approximately 30 truckloads (one way) per hour over the course of the working day, over a 9- to 15-day period during the grading/excavation period. Haul truck activity would be limited to off-peak hours (between the hours of 9:00 AM and 4:00 PM) to eliminate any peak hour impacts. Accordingly, no significant impacts would be associated with this activity, since the activities will occur outside the peak commute traffic periods, when overall traffic volumes on the area roadways are reduced from their peak hour levels.

In addition, because of shift requirements, most if not all construction worker trips occur during off peak hours (i.e., inbound trips before 7 AM, and outbound trips before 3 PM).. Although construction deliveries could occur during peak hours, the level of truck traffic associated with these deliveries would be less than the level of truck activity on the site that is occurring as of 2014 (i.e., 292 daily truck trips). Deliveries and construction worker parking would be accommodated within the Project Site and would not significantly affect surrounding roadways. Construction traffic impacts associated with Site Plan B would be less than significant.

Traffic Generation

The trip generation estimates for the Plan B Project were calculated using the same methodologies and assumptions previously described for the Plan A Project. The number of trips expected to be generated by the proposed Plan B Project are shown in Table 37 (Plan B Project Trip Generation Estimates).

The development of the Plan B Project, including removal of the Project Site 2014 uses and their associated traffic, is expected to result in changes in the current site-related traffic of a net increase of approximately 1,416 daily PCE trips, including a net reduction of approximately 12 PCE trips (reduction of one inbound, increase of 11 outbound) during the AM peak hour, and an increase of approximately 83 PCE trips (18 inbound, 65 outbound) during the PM peak hour. Specifically, as shown in Table 37, the proposed Plan B Project will result in increases of approximately 1,267 passenger vehicle and 149 PCE truck-related trips per day, including a net increase of approximately 73 passenger vehicle trips (62 inbound, 22 outbound) and a reduction of approximately 85 PCE truck trips (reduction of 63 inbound, reduction of 11 outbound) during the AM peak hour, and net increases of approximately 76 passenger vehicle trips (20 inbound, 56 outbound) and seven PCE truck trips (reduction of two inbound, increase of nine outbound) during the PM peak hour. As with the Plan A Project analyses, these “PCE-adjusted” net trips were used to evaluate the potential traffic impacts of the Plan B Project.

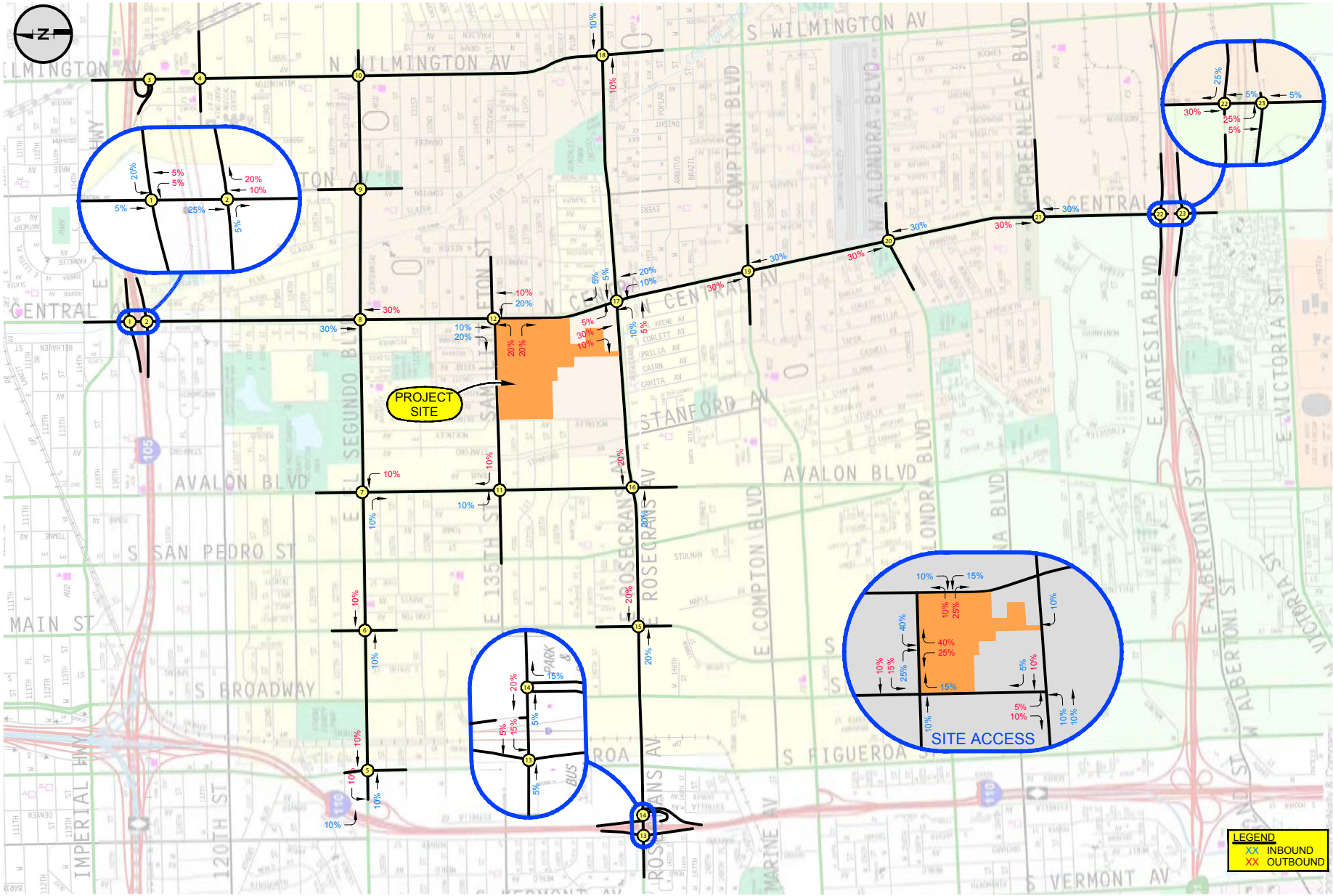
Table 37
Plan B Project Trip Generation Estimates

Size/Use		AM Peak Hour			PM Peak Hour		
	Daily	In	Out	Total	In	Out	Total
Total Proposed Plan B Project Trips (in PCE)	**2,370**	**100**	**58**	**158**	**60**	**111**	**171**
Total Proposed Plan B Project Automobile Trips	*1,441*	*72*	*22*	*94*	*28*	*74*	*102*
Total Proposed Plan B Project Truck Trips (in PCE)	*929*	*28*	*36*	*64*	*32*	*37*	*69*
Project Site 2014 Uses (Removed)							
Total Project Site 2014 Trips (in PCE) - from Table 2(b) in Appendix K in this Initial Study	**954**	**101**	**69**	**170**	**42**	**46**	**88**
Total Project Site 2014 Automobile Trips	*174*	*10*	*11*	*21*	*8*	*18*	*26*
Total Project Site 2014 Truck Trips (in PCE)	*780*	*91*	*58*	*149*	*34*	*28*	*62*
Net New Plan B Site-Related Automobile Trips	1,267	62	11	73	20	56	76
Net New Plan B Site-Related Truck Trips (in PCE)	149	(63)	(22)	(85)	(2)	9	7
Total Net New Plan B Site-Related Trips (in PCE)	**1,416**	**(1)**	**(11)**	**(12)**	**18**	**65**	**83**

Note: Values in (parentheses) indicate reductions from Project Site 2014 trips.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Geographic Trip Distributions and Traffic Assignments

The general geographic distribution of project-related traffic through the local study area and surrounding region for the Plan B Project will be identical to that identified for the Plan A Project, and as shown previously in Table 25, and in Figures 18 and 19 for that project's passenger vehicle trips and truck-related trips, respectively. Additionally, in general, the discrete intersection-level Plan B Project traffic assignments to the 23 study intersections and street segments will be the same as those for the Plan A Project. However, due to the previously-described differences in site access locations, particularly for passenger vehicles (as a result of the new Sam Littleton Street and Central Avenue driveways), but also for the truck-related traffic (revised internal circulation and more direct access to the new Building B-1 and Building B-2 sites), the Plan B Project traffic assignments will differ from the Plan A assignments shown previously at some of the intersections closest to the project site. Further, while the truck trips associated with Building B-1, Building B-2, and Building B-3 are assumed to exhibit the same general travel patterns to and from the project vicinity, each will exhibit a slightly different truck access pattern, and as such, the trip assignments for each of the buildings were identified separately. The resulting trip assignment percentages are shown in Figure 26 for project-related passenger vehicles, and in Figures 27, 28, and 29 for the truck trips associated with Building B-1, Building B-2, and Building B-3, respectively.

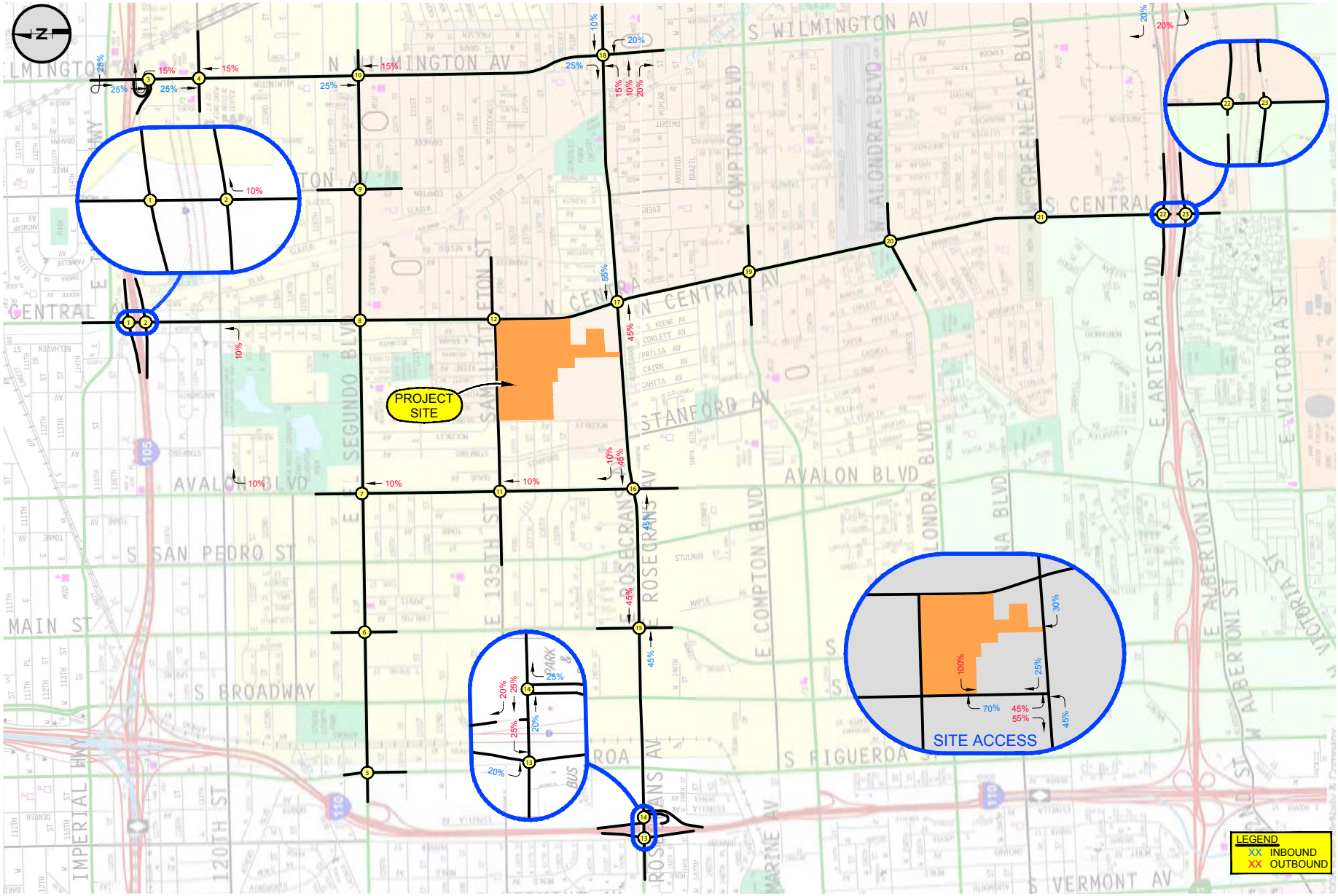


Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

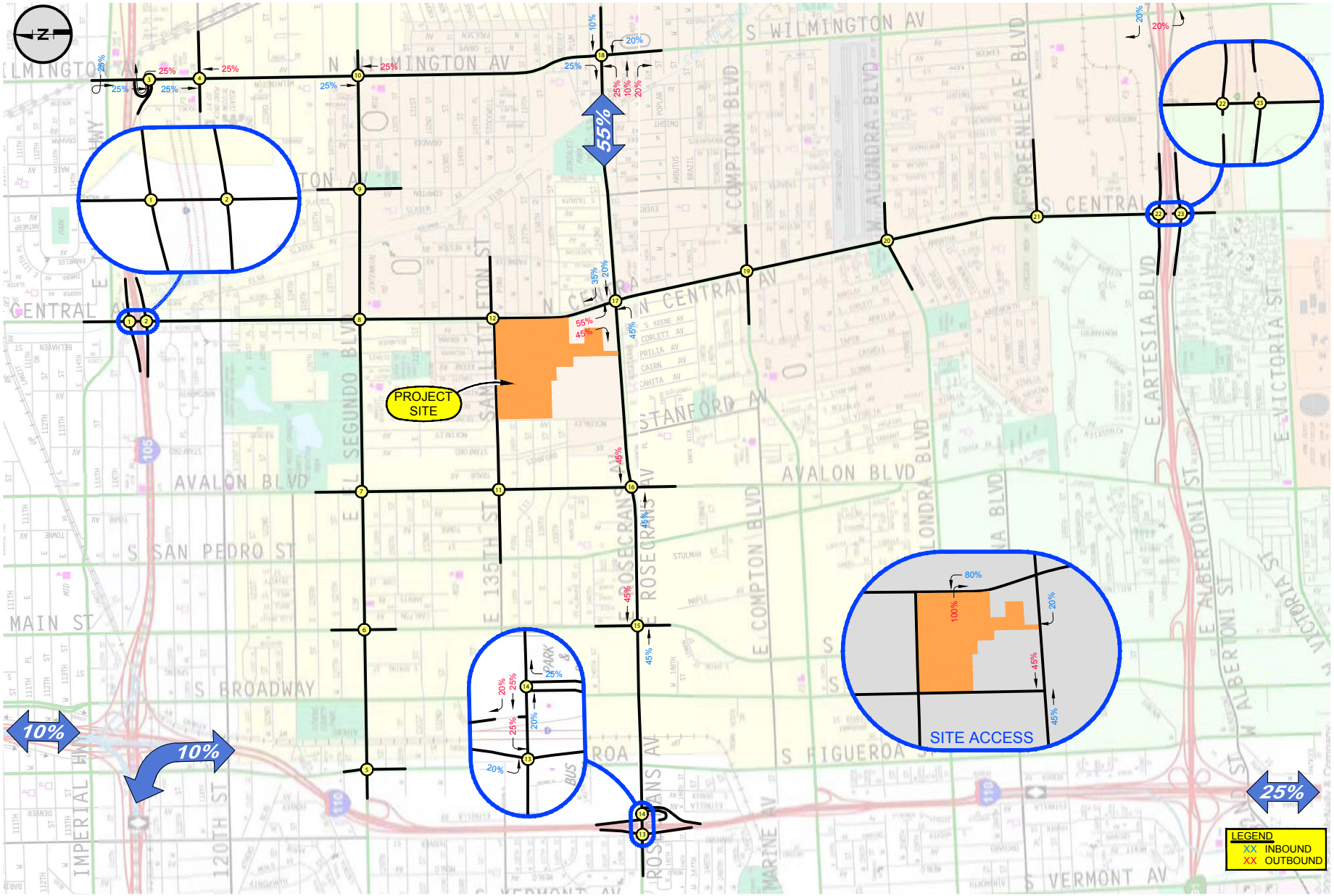
Figure 2
Plan B Project Traffic Assignment Percentages (Passenger Vehicles

#10.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Figure 27
Plan B Project Traffic Assignment Percentages (Building "B-1" – Trucks)

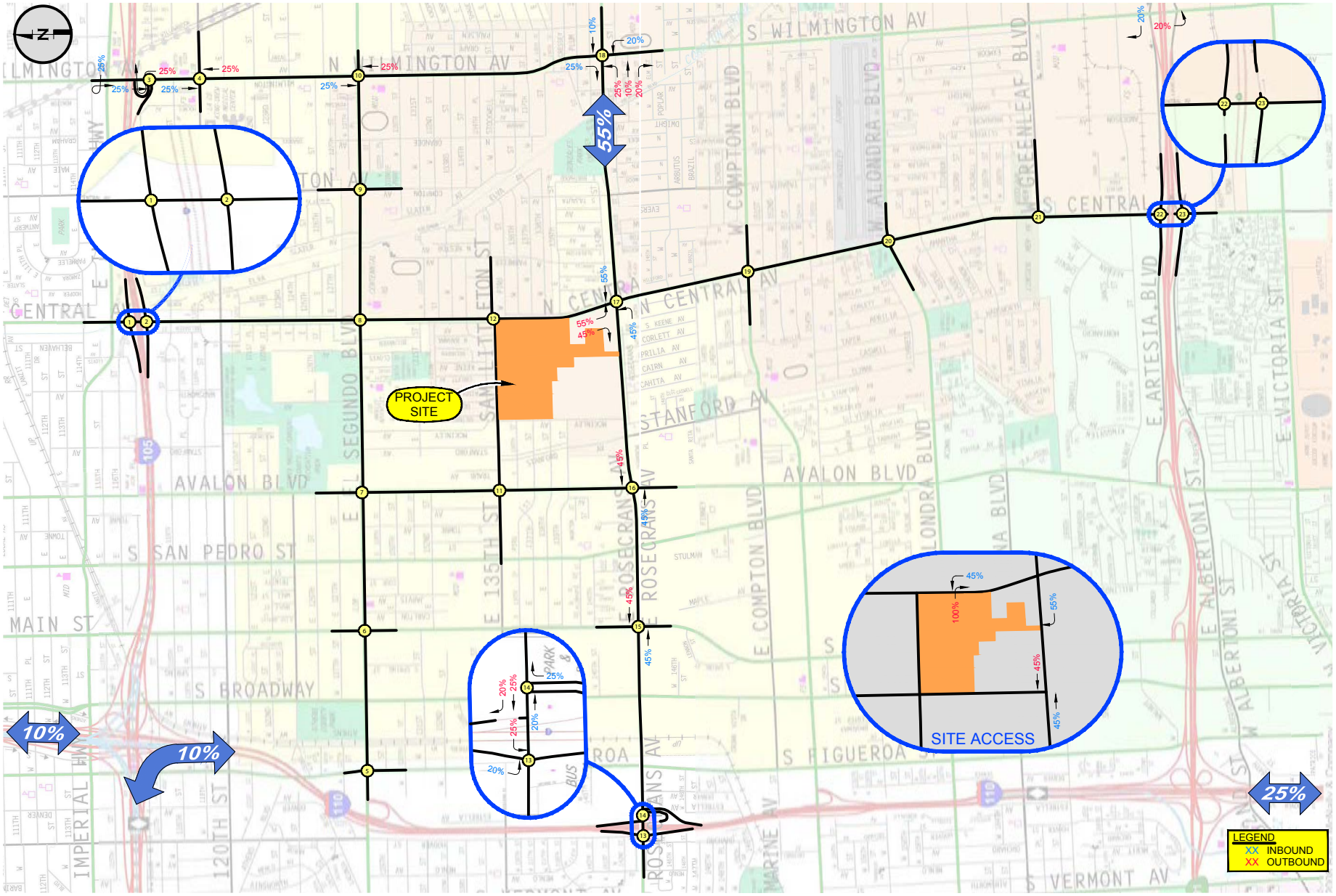


Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 2
Plan B Project Traffic Assignment Percentages (Building "B-2" – Trucks

#10.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 29
Plan B Project Traffic Assignment Percentages (Building "B-3" – Trucks)

The net new site-related PCE-adjusted trips, reflecting the anticipated changes in traffic at each of the 23 study intersections due to the development of the Project, were calculated by subtracting the Project Site 2014-related trips, which remain unchanged from those used in the Plan A Project analyses and the results are shown in Figures 30 and 31 for the AM and PM peak hours, respectively. The net site-related traffic volumes shown in these figures were used to evaluate the potential Plan B Project-related traffic impacts at each of the study intersections.

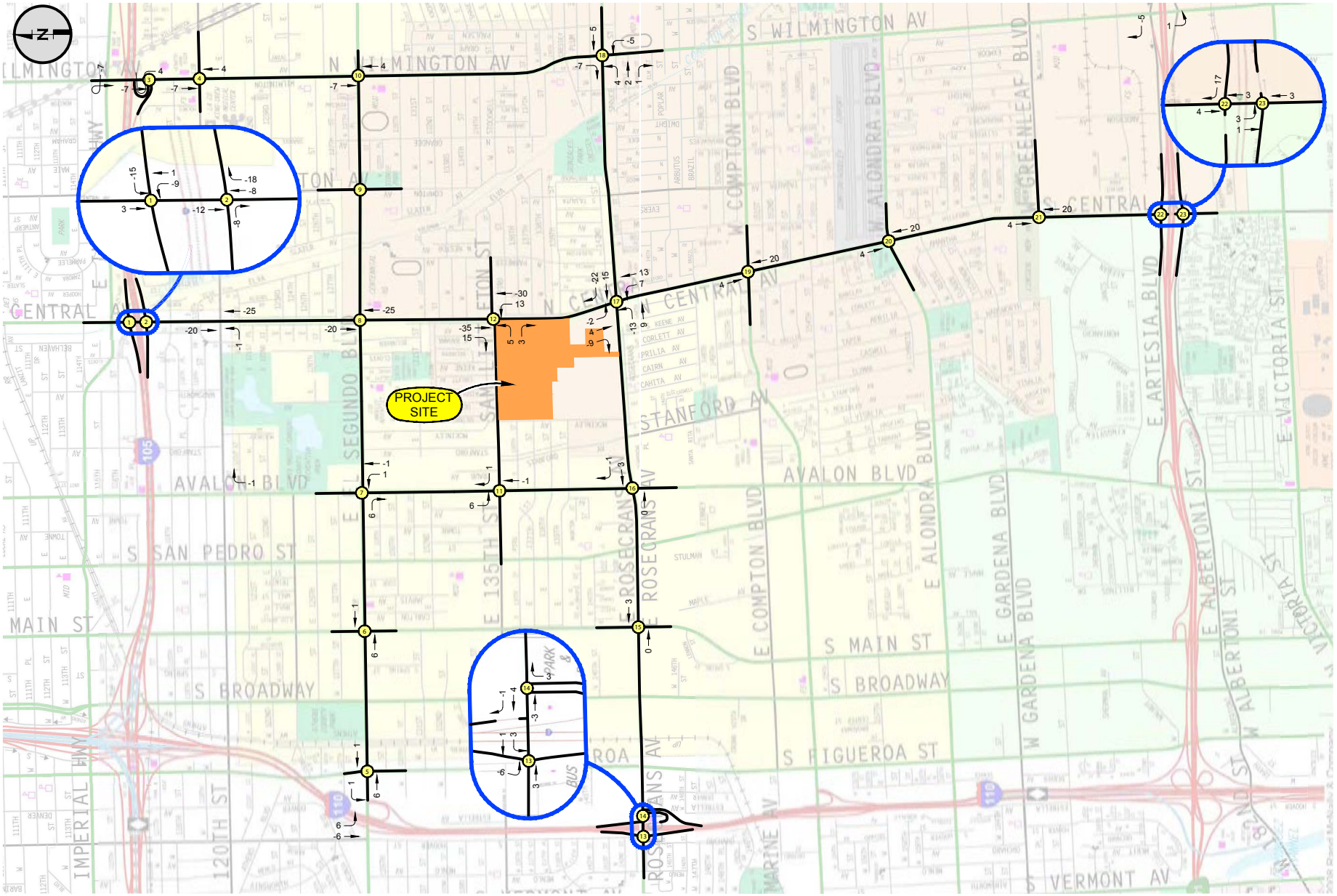
Intersection Impacts

Existing (Year 2014) Conditions

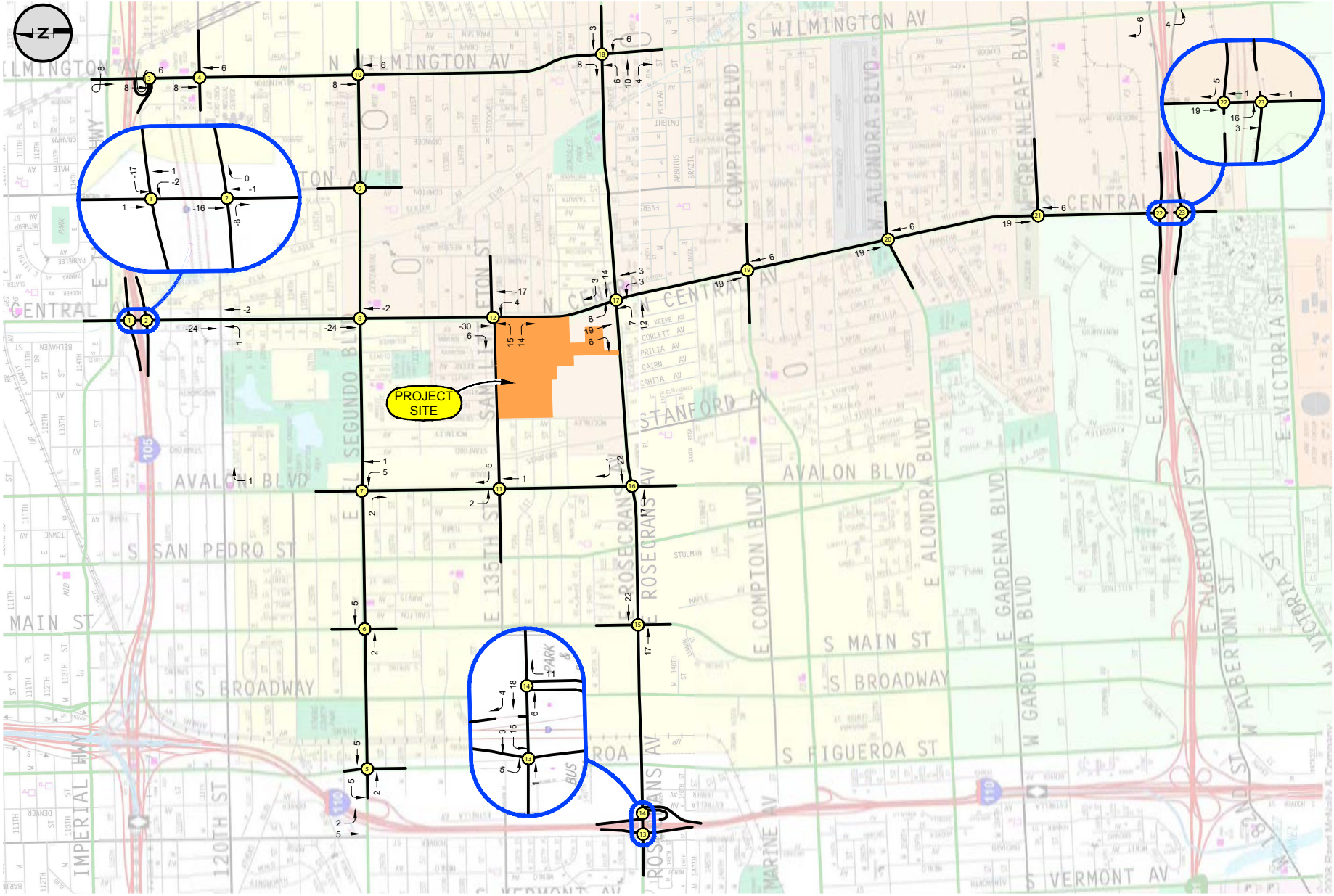
The existing (year 2014) weekday AM and PM peak hour traffic volumes at each of the subject 23 study intersections used for the analysis of the Plan B Project's impacts are identical to those used for the Plan A Project analyses.

As with the Plan A Project traffic impact evaluations, the CMA methodology was again used as the basis for the analysis and evaluation of the traffic operations for each of the 23 signalized intersections. By applying the CMA methodologies, the "Existing (2014) With Plan B Project" AM and PM peak hour conditions at each of the 23 study intersections were calculated, and are summarized in Table 38 (CMA Summary Existing (2014) Without and With Plan B Project Conditions); as noted earlier, the "Existing (No Project)" conditions are identical to those shown previously in Table 30, and were not re-analyzed for the "With Plan B Project" scenario. Table 38 identifies the operations at each of the study intersections before and after the development of the proposed Plan B Project, including incremental Plan B Project-related changes in the CMA and/or LOS values at each of the study locations.

The potential incremental Plan B Project-related effects to the current traffic conditions in the study area were then identified by comparing the existing (year 2014) "no project" conditions at each of the 23 study intersections to the anticipated "With Plan B Project" conditions. As shown in Table 38, the development of the Plan B Project and its associated changes in area traffic volumes is expected to result in incremental changes in the CMA values at most of the study intersections to varying degrees, depending upon the proximity of the intersection to the project site, its location along anticipated project traffic travel routes, or the specific geometries and/or operating characteristics of the intersection. However, as indicated in Table 38, as with the Plan A Project, the incremental traffic (and its associated effects on the CMA values) resulting from the development of the proposed Plan B Project is not expected to result in any changes to the existing operating conditions (LOS) at any of the 23 study intersections during either the AM or PM peak hours. Further, applying the County of Los Angeles Department of Public Works/LADOT intersection impact significance criteria previously identified, the development of the Plan B Project indicates that no significant impacts are expected to occur at any of the 23 study intersections under the "Existing (2014) With Plan B Project" scenario during either the AM or PM peak hours due to the development of the Plan B Project, including the three intersections shared with the adjacent City of Carson, utilizes the "significance" criteria identified in the Los Angeles County CMP (project-related increase in the intersection CMA value of 0.020 or more, at LOS E or F only). Since these criteria are less restrictive than the County/LADOT significance criteria, which identify no significant impacts are expected at any of the three study intersections shared by the cities of Compton and Carson, no significant impacts will occur at these locations under the City of Carson impact criteria.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 3
Net Site-Related Plan B Traffic Volumes – PM Peak Hou

#10.

Table 38
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Plan B Project Conditions

Int.	Intersection	Peak	No Project (2014)		With Plan B Project (2014)		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps and Central Avenue [1]	AM	0.598	A	0.597	A	-0.001
		PM	0.797	C	0.797	C	0.000
2	I-105 Freeway EB On/Off-Ramps and Central Avenue [1]	AM	0.545	A	0.539	A	-0.006
		PM	0.498	A	0.495	A	-0.003
3	I-105 Freeway EB On/Off-Ramps and Wilmington Avenue	AM	0.694	B	0.694	B	0.000
		PM	0.634	B	0.641	B	0.007
4	120th Street/119th Street and Wilmington Avenue	AM	0.571	A	0.569	A	-0.002
		PM	0.595	A	0.597	A	0.002
5	El Segundo Boulevard and Figueroa Street [1]	AM	0.472	A	0.472	A	0.000
		PM	0.634	B	0.634	B	0.000
6	El Segundo Boulevard and Main Street	AM	0.444	A	0.444	A	0.000
		PM	0.519	A	0.520	A	0.001
7	El Segundo Boulevard and Avalon Boulevard	AM	0.625	B	0.625	B	0.000
		PM	0.809	D	0.810	D	0.001
8	El Segundo Boulevard and Central Avenue	AM	0.855	D	0.848	D	-0.007
		PM	0.856	D	0.855	D	-0.001
9	El Segundo Boulevard and Compton Avenue	AM	0.569	A	0.569	A	0.000
		PM	0.527	A	0.527	A	0.000
10	El Segundo Boulevard and Wilmington Avenue	AM	0.583	A	0.580	A	-0.003
		PM	0.737	C	0.740	C	0.003
11	135th Street and Avalon Boulevard	AM	0.320	A	0.321	A	0.001
		PM	0.504	A	0.505	A	0.001
12	Sam Littleton Street/Stockwell Street (135th Street and Central Avenue	AM	0.496	A	0.504	A	0.008
		PM	0.571	A	0.586	A	0.015
13	Rosecrans Avenue and I-110 Freeway SB On/Off-Ramps [1]	AM	0.736	C	0.7386	C	0.000
		PM	0.644	B	0.654	B	0.010
14	Rosecrans Avenue and I-110 Freeway NB Off-Ramp [1]	AM	0.525	A	0.527	A	0.002
		PM	0.509	A	0.518	A	0.009
15	Rosecrans Avenue and Main Street	AM	0.455	A	0.455	A	0.000
		PM	0.575	A	0.579	A	0.004
16	Rosecrans Avenue and Avalon Boulevard	AM	0.578	A	0.579	A	0.001
		PM	0.761	C	0.766	C	0.005

Table 38
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Plan B Project Conditions

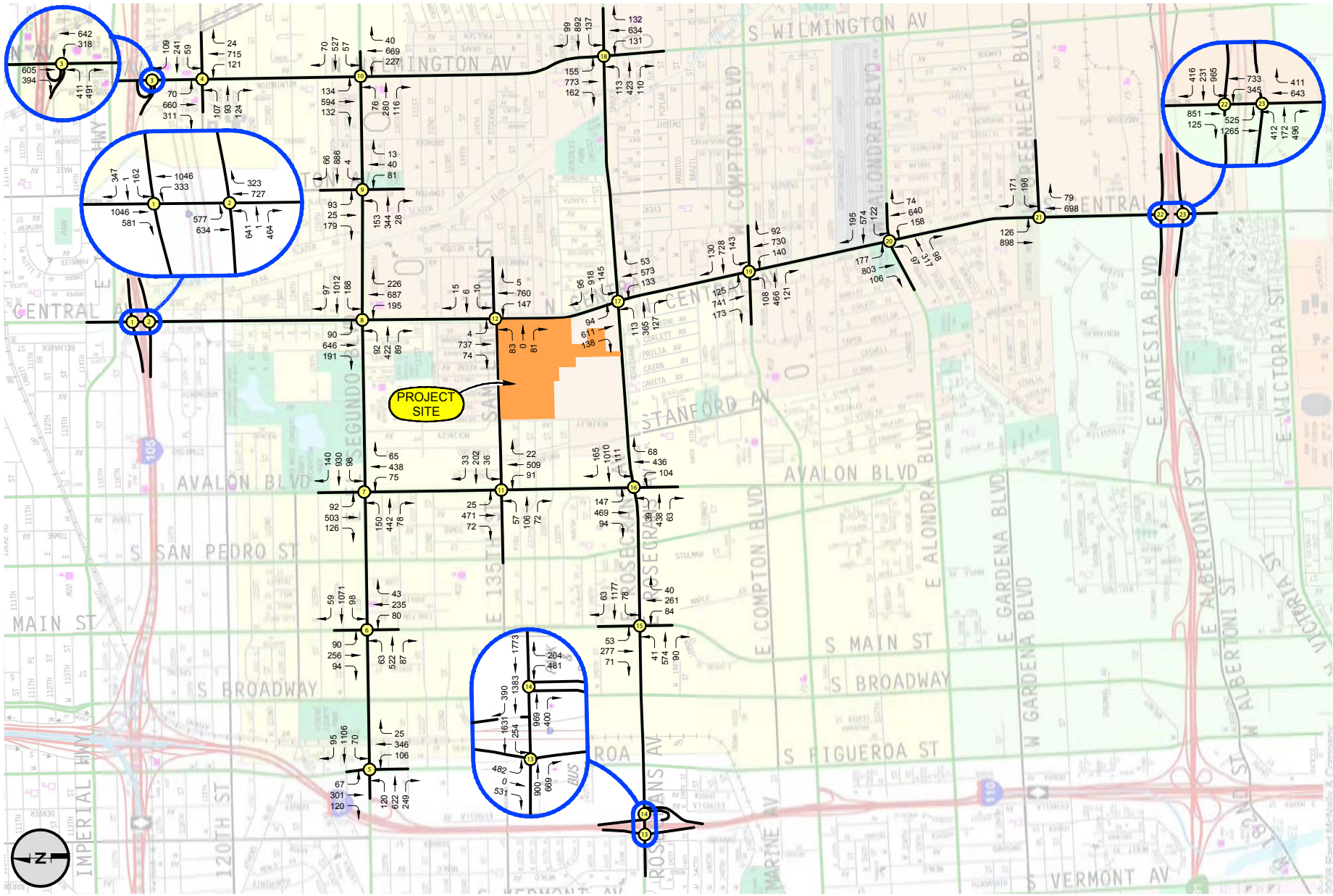
Int.	Intersection	Peak	No Project (2014) CMA	No Project (2014) LOS	With Plan B Project (2014) CMA	With Plan B Project (2014) LOS	Impact
17	Rosecrans Avenue and Central Avenue	AM	0.743	C	0.738	C	-0.005
		PM	0.752	C	0.761	C	0.009
18	Rosecrans Avenue and Wilmington Avenue	AM	0.844	D	0.842	D	-0.002
		PM	**0.966**	**E**	**0.970**	**E**	**0.004**
19	Compton Boulevard and Central Avenue	AM	0.724	C	0.725	C	0.001
		PM	0.731	C	0.733	C	0.002
20	Alondra Boulevard and Central Avenue	AM	0.695	B	0.696	B	0.001
		PM	0.858	D	0.860	D	0.002
21	Greenleaf Boulevard and Central Avenue [2]	AM	0.445	A	0.452	A	0.007
		PM	0.479	A	0.482	A	0.003
22	Artesia Boulevard (WB)/SR-91 Freeway WB On/Off-Ramps and Central Avenue [2]	AM	0.808	D	0.813	D	0.005
		PM	0.776	C	0.784	C	0.008
23	Artesia Boulevard (EB)/SR-91 Freeway EB On/Off-Ramps and Central Avenue [2]	AM	0.759	C	0.759	C	0.000
		PM	0.834	D	0.841	D	0.007

Notes:
[1]City of Los Angeles intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997, or LADOT Traffic Study Policies and Procedures, June 2013. Intersections with resulting Level of Service E or F are shown in **bold.***
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

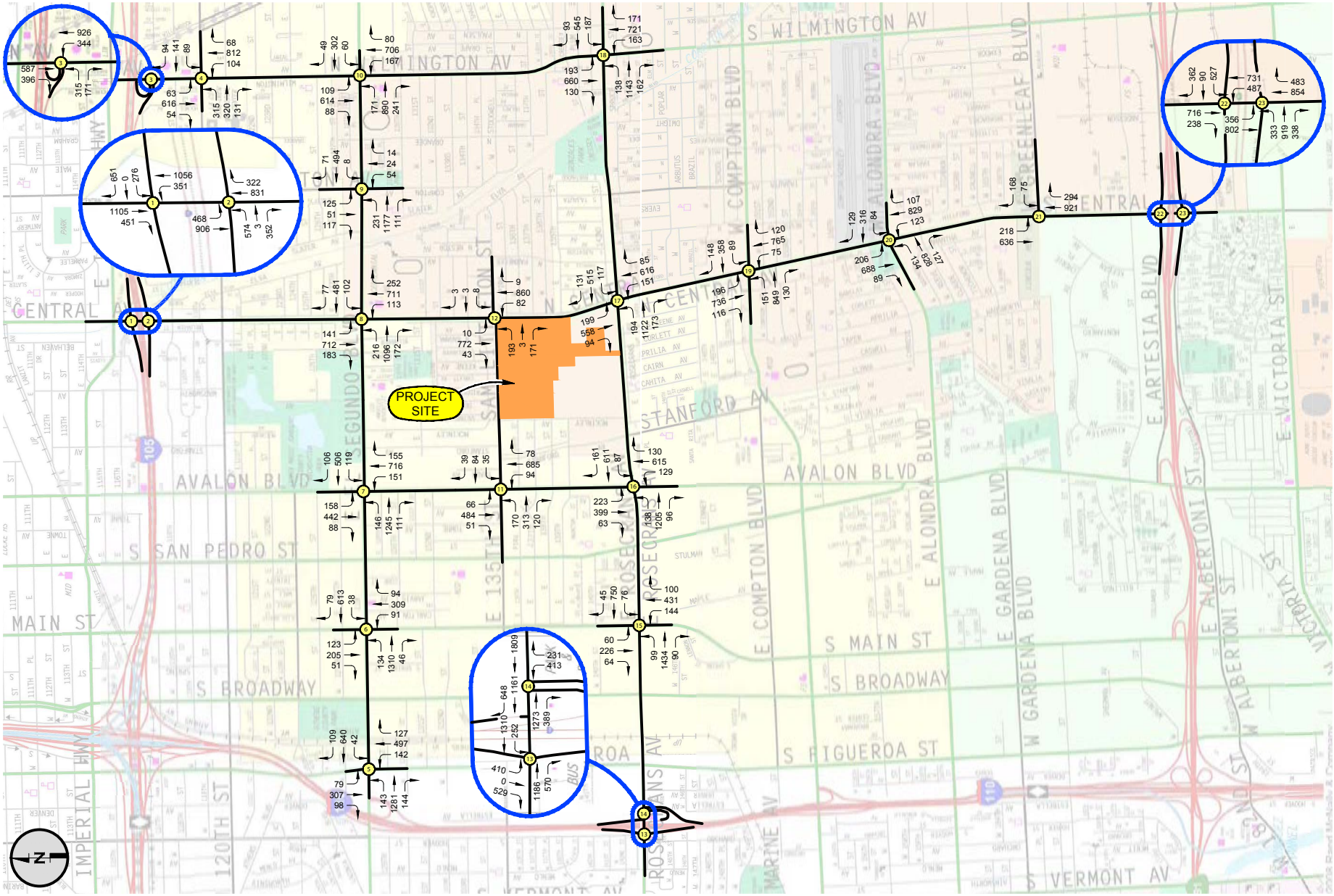
Future (Year 2017) Traffic Conditions

For the study intersections located within the City of Los Angeles (and City of Carson), the forecast future year "With Plan B Project" analysis scenario traffic volumes are shown in Figure 32 (Future (2017) Ambient Growth Plus Plan B Project Traffic Volumes – AM Peak) for the AM peak hour and Figure 33 (Future (2017) Ambient Growth Plus Plan B Project Traffic Volumes – PM Peak) for the PM peak hour, and which as also noted previously, is identical to the County's "With Cumulative Development" traffic conditions.

As also discussed in detail previously in the analysis of the Plan A Project, the existing roadway network serving the study area is already improved with a variety of measures designed to enhance traffic operations. Therefore, the analysis of the forecast future (year 2017) traffic conditions for the Plan B Project analyses also assumed that the area roadways and intersections would remain unchanged from their current conditions, with the exception of the implementation of the ATCS signal upgrades at the five signalized study intersections located wholly within the City of Los Angeles.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.



Source: Hirsch/Green Transportation Consulting, Inc., 2014.

EcoTierra consulting

Figure 3
Future (2017) Ambient Growth Plus Plan B Project Traffic Volumes – PM Pea

#10.

As with the forecast future "without project" traffic volumes at each of the 23 study intersections, the future year "without project" conditions (CMA values and associated levels of service), including the County's "With Ambient Growth Only" and LADOT's future "Without Project" analysis scenarios identified for the previous Plan A Project evaluations, will remain unchanged for the Plan B Project traffic impact analyses. However, the forecast future "with project" traffic scenarios shown in Figure 32 for the AM peak hour and Figure 33 were again analyzed using the CMA methodology, and the results of these evaluations are shown in Table 39 (CMA Future (2017) Without and With Plan B Project Conditions-City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections) for those intersections evaluated using the County's methodology (which includes both project-specific and cumulative traffic impacts), while the analysis results for the intersections that utilize LADOT's evaluation methodology (identifying only the anticipated project-specific impacts) are shown in Table 39 (Future (2017) Without and With Plan B Project Conditions-City of Los Angeles Intersections). The forecast future year 2017 "without project" conditions for all of the 23 study intersections remain as described under Plan A are unchanged for the Plan B Project analyses.

Plan B Project Intersection Analysis (2017) – City of Compton/County of Los Angeles Intersections

Once it is developed and fully operational, the net traffic generated by the proposed Plan B Project will have an effect on the operations of each of the 23 study intersections, and as shown in Table 39, is expected to result in incremental changes in the CMA values at each of the subject study intersections. However, such increases will be relatively nominal, and the changes in site-related traffic due to the development of the Plan B Project are generally not expected to result in changes to the forecast future intersection levels of service at any of the locations under the jurisdiction of the City of Compton and/or County of Los Angeles, with the exception of the two intersections of Sam Littleton Street and Central Avenue, and Rosecrans Avenue and Main Street, both of which could be slightly reduced from LOS A to LOS B during the PM peak hour by the addition of incremental project-related traffic (remaining unchanged at LOS A during the AM peak hour).

Nonetheless, despite these potential nominal reductions in the operational conditions (LOS) at Sam Littleton Street and Central Avenue, and Rosecrans Avenue and Main Street, both locations are forecast to continue to exhibit acceptable (LOS D or better) operations even with the development of the proposed Plan B Project. Further, with the exception of the lone study intersection forecast to exhibit LOS F conditions prior to the development of either the Plan A or Plan B Projects (Rosecrans Avenue and Wilmington Avenue during the PM peak hour, which as described earlier, currently operates at LOS E), all of the 18 study intersections evaluated under the County's methodology are forecast to exhibit acceptable operations, and the development of the Plan B Project will not create undesirable LOS E or LOS F conditions at any of the City of Compton, County of Los Angeles, or City of Carson intersections. Further, the results of the analyses summarized in Table 39 indicates that the incremental traffic changes resulting from the development of the Plan B Project are not expected to result in any significant project-specific impacts at any of the intersections under the forecast future (year 2017) conditions using the County's "future conditions" analysis methodology. Therefore, no Plan B Project-specific mitigation measures are warranted for any of the 18 study locations.

Table 39
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan B Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int.#	Intersection	Peak Hour	Existing Plus Ambient (2017)		Existing Plus Ambient Plus Plan B Project (2017)			Cumulative (2017)[1]		Total Impact	Project % of Total Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS		
	I-105 Freeway EB On/Off-Ramps	AM	0.724	C	0.724	C	0.000	0.731	C	0.007	0.0%
3	and Wilmington Avenue	PM	0.662	B	0.669	B	0.007	0.674	B	0.012	58.3%
	120th Street/119th Street	AM	0.595	A	0.593	A	-0.002	0.594	A	-0.001	n/a [3]
4	and Wilmington Avenue	PM	0.622	B	0.624	B	0.002	0.625	B	0.003	66.7%
	El Segundo Boulevard	AM	0.463	A	0.463	A	0.000	0.465	A	0.002	0.0%
6	and Main Street	PM	0.542	A	0.543	A	0.001	0.543	A	0.001	100.0%
	El Segundo Boulevard	AM	0.651	B	0.652	B	0.001	0.659	B	0.008	12.5%
7	and Avalon Boulevard	PM	0.842	D	0.844	D	0.002	0.847	D	0.005	40.0%
	El Segundo Boulevard	AM	0.891	D	0.8841	D	-0.007	0.888	D	-0.003	n/a [3]
8	and Central Avenue	PM	0.892	D	0.892	D	0.000	0.898	D	0.006	0.0%
	El Segundo Boulevard	AM	0.593	A	0.593	A	0.000	0.593	A	0.000	0.0%
9	and Compton Avenue	PM	0.549	A	0.549	A	0.000	0.549	A	0.000	0.0%
	El Segundo Boulevard	AM	0.608	B	0.606	B	-0.002	0.608	B	0.000	n/a [3]
10	and Wilmington Avenue	PM	0.769	C	0.772	C	0.003	0.775	C	0.006	50.0%
	135th Street	AM	0.334	A	0.335	A	0.001	0.339	A	0.005	20.0%
11	and Avalon Blvd	PM	0.526	A	0.527	A	0.001	0.531	A	0.005	20.0%
	Sam Littleton Street/Stockwell Street (135th Street)	AM	0.517	A	0.525	A	0.008	0.535	A	0.018	44.4%
12	and Central Avenue	PM	0.594	A	0.609	B	0.015	0.622	B	0.028	53.6%
	Rosecrans Avenue	AM	0.474	A	0.475	A	0.001	0.483	A	0.009	11.1%
15	and Main Street	PM	0.600	A	0.603	B	0.003	0.612	B	0.012	25.0%
	Rosecrans Avenue	AM	0.603	B	0.604	B	0.001	0.625	B	0.022	4.5%
16	and Avalon Boulevard	PM	0.793	C	0.797	C	0.004	0.825	D	0.032*	12.5%
	Rosecrans Avenue	AM	0.775	C	0.769	C	-0.006	0.796	C	0.021	n/a [3]
17	and Central Avenue	PM	0.785	C	0.794	C	0.009	0.812	D	0.027*	33.3%
	Rosecrans Avenue	AM	0.879	D	0.879	D	0.000	0.895	D	0.016	n/a [3]
18	and Wilmington Avenue	PM	**1.008**	**F**	**1.011**	**F**	**0.003**	**1.023**	**F**	0.015*	20.0%
19	Compton Boulevard	AM	0.755	C	0.756	C	0.001	0.764	C	0.009	11.1%

Table 39
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan B Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int.#	Intersection	Peak Hour	Existing Plus Ambient (2017)		Existing Plus Ambient Plus Plan B Project (2017)			Cumulative (2017)[1]		Total Impact	Project % of Total Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS		
	and Central Avenue	PM	0.762	C	0.764	C	0.002	0.769	C	0.007	28.6%
	Alondra Boulevard	AM	0.723	C	0.724	C	0.001	0.732	C	0.009	11.1%
20	and Central Avenue	PM	0.893	D	0.896	D	0.003	0.900	D	0.007	42.9%
	Greenleaf Boulevard	AM	0.464	A	0.471	A	0.007	0.477	A	0.013	53.8%
21	and Central Avenue [2]	PM	0.500	A	0.502	A	0.002	0.503	A	0.003	66.7%
	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps	AM	0.843	D	0.847	D	0.004	0.854	D	0.011	36.4%
22	and Central Avenue [2]	PM	0.809	D	0.818	D	0.009	0.827	D	0.018	50.0%
	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps	AM	0.792	C	0.792	C	0.000	0.795	C	0.003	0.0%
23	and Central Avenue [2]	PM	0.870	D	0.877	D	0.007	0.884	D	0.014	50.0%

Notes:

[1] Includes ambient traffic growth, proposed Plan B Project and related projects.

[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.

[3] Project (Plan B) results in reduction in CMA value (improved intersection operations). No contribution toward cumulative impacts.

"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997. Intersections with resulting Level of Service E or F are shown in **bold.***

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Plan B Project Intersection Analysis (2017) – City of Los Angeles Intersections

As shown in Table 40 for LADOT's future (year 2017) "With Project" conditions, the addition of the anticipated incremental traffic resulting from the Plan A Project is not anticipated to result in changes to the forecast future "without project" conditions at any of the City of Los Angeles controlled intersections during either the AM or PM peak hours. Additionally, applying LADOT's intersection impact significance criteria, the development of the Plan B Project will not result in significant impacts at any of the five locations within the City of Los Angeles studied under LADOT's "future" analysis scenarios, and therefore, no Project-specific mitigation measures are warranted for any of these locations.

As a result, the development of the Plan B Project will not result in significant project-specific impacts at any of the 23 study intersections (regardless of their jurisdiction), and despite slight reductions in the forecast "without project" levels of service at two of the locations, the addition of the incremental Project-related traffic to the study area will not create any undesirable (LOS E or F) intersection operations in the project vicinity. As such, no Project-specific mitigation measures are warranted at any of the 23 study intersections.

Table 40
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan B Project Conditions
City of Los Angeles Intersections

Int. No.	Intersection	Peak Hour	Without Project		With Plan B Project		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps	AM	0.598	A	0.596	A	-0.002
	and Central Avenue	PM	0.805	D	0.805	D	0.000
2	I-105 Freeway EB On/Off-Ramps	AM	0.544	A	0.538	A	-0.006
	and Central Avenue	PM	0.495	A	0.492	A	-0.003
5	El Segundo Boulevard	AM	0.466	A	0.466	A	0.000
	and Figueroa Street	PM	0.634	B	0.635	B	0.001
13	Rosecrans Avenue	AM	0.756	C	0.756	C	0.000
	and I-110 Freeway SB On/Off-Ramps	PM	0.665	B	0.675	B	0.010
14	Rosecrans Avenue	AM	0.535	A	0.537	A	0.002
	and I-110 Freeway NB Off-Ramp	PM	0.520	A	0.528	A	0.008

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Cumulative Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

The cumulative effects of potential additional traffic resulting from ongoing and proposed development within the study area, including the proposed Plan B Project itself, were also evaluated for each of the 18 City of Compton/County of Los Angeles intersections using the County's impact evaluation methodologies as described earlier. The results of the analysis of these forecast cumulative conditions, also shown in Table 39, indicate that the total additional traffic generated by the four "related projects" and the proposed Plan B Project is not generally expected to result in any changes in the operations of the subject intersections compared to the baseline forecast "With Ambient Growth" conditions. However, if the four related projects identified previously in Table 30 are developed as currently proposed, along with the proposed Plan B Project, the combined effects of the associated additional traffic could result in a slight deterioration of the operations of the intersections of Sam Littleton Street and Central Avenue, and Rosecrans Avenue and Main Street from LOS A to LOS B during the PM peak hour (the AM conditions would remain unchanged at LOS A for both locations), while the intersections of Rosecrans Avenue and Avalon Boulevard, and Rosecrans Avenue and Central Avenue could each be reduced from their forecast "With Ambient Growth" LOS C conditions to LOS D operations, also during the PM peak hour (although the operations of both locations would be unaffected by the cumulative traffic increases during the AM peak hour, remaining at LOS B and LOS C, respectively). However, despite the potential changes in the operational levels at these four intersections, all of the City of Compton/County of Los Angeles intersections are forecast to exhibit LOS D or better operations during both peak hours for the "With Cumulative Development" conditions, again with the exception of the intersections of Rosecrans Avenue and Wilmington Avenue, which as noted previously, currently (year 2014) exhibits LOS E operations during the PM peak hour.

As summarized in Table 39, the anticipated cumulative development traffic additions to these intersections, including the effects of the proposed Plan B Project, could produce significant

cumulative impacts at a total of three intersections: Rosecrans Avenue and Avalon Boulevard, Rosecrans Avenue and Central Avenue, and Rosecrans Avenue and Wilmington Avenue. These cumulative impacts are anticipated to occur during the PM peak hour only. Further, although as noted earlier the Plan B Project itself is not expected to result in significant impacts at any of the study intersections under the forecast future (year 2017) conditions, like the Plan A Project evaluated previously in this study, it will contribute incrementally to these three cumulative impacts to some degree. Therefore, the magnitudes of the proposed Plan B Project's specific contributions toward the total cumulative impacts (again identified as a percentage of the total cumulative impact) were also identified. As also indicated in Table 39, the proposed Plan B Project itself is estimated to contribute a little over 12 percent of the total cumulative PM peak hour impact at the intersection of Rosecrans Avenue and Avalon Boulevard, about 20 percent of the impact at Rosecrans Avenue and Wilmington Avenue, and about 33 percent of the cumulative impact at the intersection of Rosecrans Avenue and Central Avenue. Mitigation measures to address the potential cumulative impacts are identified below.

Supplemental Analysis – Shared City of Compton/City of Carson Intersections

Finally, as described previously, while the City of Compton is the lead jurisdiction for the review of the proposed Brickyard Commerce Center project, three of the study intersections exhibit shared jurisdiction between the City of Compton and the adjacent City of Carson, although at the direction of the City of Compton, the conditions and potential Plan B Project-related impacts to these locations were evaluated using the County's methodology. The results of those evaluations, summarized previously in Table 39, indicate that no project-specific or cumulative impacts are expected at any of these three locations. However, in order to provide additional informational for the City of Carson decision-makers, as well as to comply with the City of Carson's own analysis procedures, a supplemental analysis of these three intersections was prepared using the City of Carson's traffic impact methodologies, which are, in general, the same as those used by LADOT, although the City of Carson defines a significant impact, based on the current Los Angeles County CMP criteria, as a project-related increase of 0.020 or more in the intersection CMA value when the final ("with project") level of service at the subject intersection exhibits LOS E or F operations. The results of the evaluation of the potential project-specific impacts of the Plan B Project at the three study intersections exhibiting shared jurisdiction between the City of Compton and City of Carson are summarized in Table 41 (CMA Summary Future (2017) Without and With Plan B Project Conditions-City of Carson Intersections).

As shown in Table 41, the addition of the net traffic resulting from the proposed Plan B Project is not expected to result in the deterioration of any of the forecast future (2017) "Without Project" conditions at any of the three study intersections shared with the City of Carson beyond those resulting from anticipated ambient traffic growth or traffic generated by related projects, and will not create any new "undesirable" conditions at any of the three intersections. Further, based on the City of Carson's significance criteria, no significant Plan B Project-related impacts will occur within that City's jurisdiction, and no project-related traffic mitigation measures are warranted.

Table 41
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Plan B Project Conditions
City of Carson Intersections

Int.	Intersection	Peak	Without Project		With Plan B Project		
			CMA	LOS	CMA	LOS	Impact
21	Greenleaf Boulevard and Central Avenue	AM	0.470	A	0.477	A	0.007
		PM	0.501	A	0.503	A	0.002
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue	AM	0.849	D	0.854	D	0.005
		PM	0.820	D	0.827	D	0.007
23	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps and Central Avenue	AM	0.794	C	0.795	C	0.001
		PM	0.877	D	0.884	D	0.007

Notes:
"Without Project" includes ambient growth and related projects traffic.
""Indicates significant impact per City of Carson (Los Angeles County CMP) criteria (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Traffic Signal Warrant Analysis

No separate traffic signal warrant analyses were performed for the Plan B Project, since the evaluations prepared earlier for the Plan A Project are sufficient to conclude that new traffic signals are warranted at both the Plan B Project driveway on Central Avenue opposite 139th Street, and at the intersection of Rosecrans Avenue at McKinley Avenue, and continue to remain applicable to the Plan B Project conditions. However, as with the Plan A Project, the Project Applicant will work with the City of Compton, the County of Los Angeles Department of Public Works and/or other cognizant jurisdictions regarding the approval and installation of both new traffic signals, which can occur at any time prior to the issuance of any building permits for the project. All costs and work associated with the design and installation of each new traffic signal will be borne by the Project Applicant. Each of the new traffic signals will be designed to the satisfaction of the City of Compton, including both physical installation and signal operations. Based on preliminary input from the City, it is anticipated that each of the proposed new traffic signals will operate with exclusive ("protected") left-turn phases in one or more directions, which allow left-turns to occur only when the left-turn arrow is illuminated. Installation of the new traffic signals shall occur prior to issuance of the first project Certificate of Occupancy, including the required project-related site-adjacent roadway improvements and mitigation measures. Installation of the identified signals shall be a Condition of Approval for the Project.

In addition to controlling access into and out of the Project site, the proposed installation of a new traffic signal at the intersection of Central Avenue and 139th Street would provide enhanced access to and from the existing residential neighborhoods to the east of Central Avenue. Although it is possible that improving residential access into and out of these neighborhoods via 139th Street could result in some redistribution of the existing residential traffic in order to utilize the new signal (particularly due to the enhanced ability to turn left from 139th Street onto southbound Central Avenue), any changes in travel patterns are not expected to be substantial, primarily due to the presence of the existing traffic signal at Central Avenue and Piru Street. Since this existing signal already allows residents of the neighborhoods east of Central Avenue to make left-turns onto southbound Central Avenue during the Piru Street signal phase, large diversions of traffic from Piru Street to 139th Street are not likely, and no significant change in traffic volumes along 139th Street due to the installation of the new traffic signal are anticipated.

Plan B Project Street Segment Traffic Impact Analysis

The potential impacts of the proposed Plan B Project were also evaluated for the eight street segments identified previously for the Plan A Project. The resulting existing (2014) "no project" and "With Plan B Project" traffic volumes, as well as the future (2017) forecast "Without Project" and "With Plan B Project" traffic estimates for each of the eight street segments, along with the identification of the potential incremental Plan B Project impacts for each location, are summarized in Table 42 (Street Traffic Impact Analysis Summary-Proposed Plan B Project).

Due primarily to the locations of the two new site access driveways along Sam Littleton Street, the Plan B Project will add a variable amount of net new daily traffic to each of the three subject segments of this street, including approximately 125 net vpd (total of both directions) along the segment to the west of the project site (west of McKinley Avenue), approximately 341 net vpd on the segment between McKinley Avenue and Corlett Avenue, and approximately 480 net vpd on the segment between Corlett Avenue and Central Avenue. Similarly, the Plan B Project is expected to add a total of approximately 216 net vpd to the segment of McKinley Avenue between the site driveway and Sam Littleton Street/135th Street. As with the Plan A Project, the potential Plan B Project trips on each of these three street segments will consist only of passenger vehicles. Due to the proposed Plan B site access operations, including no truck access to or from the project's Sam Littleton Street driveways, along with the left-turn-only exit restrictions at the McKinley Avenue truck-only driveway, no project-related truck trips will occur on Sam Littleton Street/135th Street, or on McKinley Avenue north of the site driveway on that street. Additionally, the Plan B Project is anticipated to increase total daily traffic along Central Avenue south of Rosecrans Avenue by approximately 397 net vpd, although it would result in a reduction of approximately 46 net vehicles per day on the segment of Central Avenue north of the project site; again, due to the current truck traffic prohibitions on Central Avenue within the City of Compton, no Plan B Project-related truck trips will occur on Central Avenue to the north of Sam Littleton Street or south of Rosecrans Avenue.

The Plan B Project is expected to increase the daily traffic volumes along the segment of McKinley Avenue south of the project site (adjacent to the existing commercial/industrial uses along that street between approximately 138th Street and Rosecrans Avenue) by a total of approximately 601 net PCE-adjusted vpd, while it is anticipated to add a total of approximately 511 PCE-adjusted vpd to the segment of Rosecrans Avenue west of the project site.

Plan B Project will not result in changes in the operational levels of any of the studied street segments under either the existing or forecast future traffic scenarios. As a result, each of the subject street segments will continue to exhibit acceptable (LOS D or better) operations even following the addition of the anticipated incremental Plan B Project-related traffic. Therefore, the Plan B Project will not result in significant impacts to any of these facilities, and as such, no Plan B Project-related street segment mitigation measures are warranted.

Table 42
Street Traffic Impact Analysis Summary - Proposed Plan B Project
Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service

Street/Segment	Existing (2014)							Future (2017)					
	No	V/C	LOS	Project Traffic *	With Project	V/C	LOS	Without Project	V/C	LOS	With Project	V/C	LOS
Sam Littleton Street/135th Street													
Stanford Ave. to McKinley Ave. [1]	4,478	0.299	A	125	4,603	0.307	A	4,795	0.320	A	4,920	0.328	A
McKinley Ave. to Corlett Ave. [2]	3,641	0.364	A	341	3,982	0.398	A	3,942	0.394	A	4,283	0.428	A
Corlett Ave. to Central Ave. [2]	3,786	0.379	A	480	4,266	0.427	A	4,093	0.409	A	4,573	0.457	A
McKinley Ave.													
136th St. to 137th St. [2]	677	0.068	A	216	893	0.089	A	978	0.098	A	1,194	0.119	A
139th St. to Rosecrans Ave.[2]	1,350	0.135	A	601	1,951	0.195	A	2,817	0.282	A	3,418	0.342	A
Central Ave.													
Sam Littleton St. to El Segundo Blvd. [3]	25,529	0.851	D	-46	25,483	0.849	D	26,798	0.893	D	26,752	0.892	D
Compton Blvd. to Rosecrans Ave. [4]	21,613	0.569	A	397	22,010	0.579	A	22,832	0.601	B	23,229	0.611	B
Rosecrans Ave.													
Avalon Blvd. to Stanford Ave. [5]	25,844	0.584	A	511	26,355	0.596	A	28,080	0.635	B	28,591	0.646	B

Notes:
** Net volumes for proposed Plan B Project; includes removal of Project Site 2014 uses. Adjusted for PCE. Same for both "Existing" and "Future" conditions.*
[1] 2-lane Collector Roadway, assumed design capacity of 15,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[2] 2-lane Local Street, assumed design capacity of 10,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[3] 4-lane undivided Major Highway, assumed design capacity of 30,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 4-lane divided Major Highway, assumed design capacity of 38,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 6-lane undivided Major Highway, assumed design capacity of 44,250 vpd equates to 75% of maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Parking and Access

Parking Requirements and Parking Supply

Automobile Parking

Under the proposed Text Amendment to the CMC currently under consideration by the City related to parking requirements for industrial/warehouse facilities, the Site Plan B Project would require 603 parking spaces[61]. Since the Plan B Project will contain the same warehouse/distribution center facilities as the Plan A Project, it is expected to exhibit the same type of "per unit area" parking demands. Therefore, based on this assumption, the approximately 1,077,000 total square foot Plan B Project is estimated to need a total of approximately 441 parking spaces, including about 215 spaces for Building B-1, 197 spaces for Building B-2, and 29 spaces for Building B-3.[62] The entire Plan B Project site will provide a total of approximately 632 parking spaces, approximately 191 spaces more than are expected to be necessary based upon demand, and 31 spaces greater than the modified requirement under the proposed CMC Text Amendment. Specifically, Building B-1 will provide approximately 270 parking spaces, or about 55 more than its anticipated demand, while Building B-2 will provide approximately 275 spaces, about 82 spaces beyond its expected peak parking demands, and Building B-3 will provide a total of approximately 87 spaces, well in excess of its anticipated peak parking demand of 29 spaces. Additionally, although the proposed Plan B development scheme contains approximately 30 percent less floor area than the Plan A Project, the amount of parking provided for the overall Plan B Project site will still be sufficient to accommodate the parking demands associated with a total employment level of between 500 and 600 employees (in two shifts of approximately 250 to 300 employees) without experiencing an on-site parking shortfall, even during shift changes. As a result, no off-site vehicular parking impacts or project-related parking "spillover" onto nearby streets resulting from insufficient on-site vehicular parking supplies are expected. Further, as with the Plan A Project, the provision of the approximately 191 "excess" parking spaces (compared to the anticipated peak demands) will allow for the addition of temporary "seasonal" workers without resulting in an on-site parking shortfall. Finally, again like the Plan A Project, all of the on-site automobile parking spaces will be "standard" sized spaces (nine feet wide, 20 feet long).

Truck Parking/Loading Spaces

The City of Compton does not identify parking requirements for truck parking or trailer storage spaces for warehousing or distribution center developments, and therefore, as described previously for the Plan A Project, the amount of truck/trailer parking needed for the proposed Plan B Project was again estimated based on the requirements for "high-cube warehousing" facilities contained in the Zoning Code for the City of Perris, California. The total 1,077,000 square feet proposed for the Plan B Project would require a total of approximately 215 truck parking/trailer storage spaces. The Plan B Project will provide a total of approximately 314 "container" parking spaces (used for both truck parking and trailer storage), including approximately 168 such spaces located adjacent to Building B-1 (100 spaces on the west side of the building, comprised of 50 "tandem" spaces, and 68 spaces on the east site) and approximately 146 spaces surrounding Building B-2 (71 spaces on the east side and 75 spaces on the west side of the building), or

[61] *The parking requirement for Site Plan B would be greater than Site Plan A, even though Site Plan A includes larger total development, because the parking requirement is determined for each building separately.*

[62] *As with Site Plan A, the estimated parking demand for Site Plan B was calculated using the 4th Edition of the ITE's Parking Generation manual.*

approximately 99 more truck parking/trailer storage spaces (approximately 46 percent more, similar to the Plan A Project) than that would be required using the City of Perris parking ratios. Additionally, the 314 "container" parking spaces provided by the Plan B Project equates to nearly 1.5 truck parking/trailer storage spaces for each of the approximately 211 total loading docks (88 docks in Building B-1, 111 docks in Building B-2, and 12 docks in Building B-3) proposed for this site development scheme, or about 10 percent more than the approximately 1.35 spaces per loading dock based on the City of Perris requirements referenced earlier. Therefore, the Plan B Project will provide adequate on-site truck parking/trailer storage spaces to accommodate its expected demands for such spaces, and no off-site parking impacts in the residential or commercial areas adjacent to the project site are anticipated.

Additionally, the City of Compton's Zoning Code requires that the Plan B Project provide a total of three short-term loading spaces (for projects in excess of 50,000 square feet). It is anticipated that the required loading areas will be provided at or near the entrances to each of the three Plan B buildings.

Vehicular Driveway Access and Operations

Passenger vehicle access to the on-site parking facilities for the proposed Plan B Project will be provided by a total of five driveways, including two "full-access" driveways on Central Avenue; opposite 139th Street (for access primarily to Buildings B-2 and B-3), and opposite Piru Street (passenger vehicle access only, accessing the Building B-2 passenger vehicle parking lot); along with two additional "full access" driveways located along Sam Littleton Street, the first located approximately midway between McKinley Avenue and Corlett Avenue (providing access to the passenger vehicle parking lot for Building B-1), and the second located approximately 120 feet to the west of Bahama Avenue (accessing the Building B-2 passenger vehicle parking lot), and the proposed driveway on Rosecrans Avenue, which will continue to be restricted to right-turn-only, entry-only operations. As noted previously, the Project proposes to install a new traffic signal at the intersection of Central Avenue and 139th Street in order to facilitate traffic flow at this location (including both Project-related driveway traffic as well as local traffic accessing the residential neighborhood located east of Central Avenue); the intersection of Central Avenue and Piru Street is already signalized, and will also ultimately control the operations of the Plan B Project's proposed passenger vehicle-only driveway at this location, although modifications to the signal will be necessary to allow access for the Project driveway. The new Project driveways on Rosecrans Avenue (no exits permitted), McKinley Avenue, and Sam Littleton Street are not proposed to be signalized.

Each of the proposed Plan B Project buildings will provide their own independent passenger vehicle parking lots, and although all of the on-site passenger vehicle parking areas can be accessed from each of the five driveways via the internal circulation roadways, due to internal security gates and circuitous travel paths, it is anticipated that employees and visitors to the site will use the driveways either directly serving or closest to the parking areas provided for their particular destination building. For Building B-1, passenger vehicles are anticipated to primarily use the western Sam Littleton Street driveway, although access to portions of the automobile parking provided for this building are also accessible via the driveways on Central Avenue (at 139th Street) or Rosecrans Avenue. Similarly, for Building B-2, the primary passenger vehicle access locations are anticipated to be the eastern Sam Littleton Street driveway and the Central Avenue driveway at Piru Street, both of which directly access the Building B-2 passenger vehicle parking lot, although again, some of the passenger vehicle parking for this building can also be accessed from the driveways on Central Avenue at 139th Street and via the Rosecrans Avenue driveway. Finally, automobiles destined for Building B-3 are expected to enter the site primarily via the Rosecrans Avenue or Central Avenue (at 139th Street) driveways, although as with the

Plan A Project, due to the entry-only operations of the Rosecrans Avenue driveway, passenger vehicles entering from that location will exit via one of the other driveways, likely at Central Avenue and 139th Street.

As with the Plan A Project, truck access for the Plan B Project will be provided at three locations, including the driveways on Central Avenue at 139th Street (no truck access is permitted at the driveway opposite Piru Street), and on Rosecrans Avenue, both of which will also be shared with passenger vehicles, although like the Plan A Project access described earlier, truck traffic using the Central Avenue driveway for the Plan B Project will be restricted to entry from or exit to the south along Central Avenue, and the Rosecrans Avenue driveway will continue to exhibit right-turn-only, entry-only operations. The third truck access location will also again be on McKinley Avenue opposite 138th Street, which will be constructed such that only right-turn entry and left-turn exit moves can occur. Although automobile access would not be prohibited at this driveway, no substantial automobile access to or from the McKinley Avenue driveway was assumed for the purposes of this traffic analysis due primarily to its anticipated primarily truck-oriented operations.

Trucks entering the site can access the truck docks and/or truck parking/trailer storage spaces for any of the three Plan B buildings, either directly from the nearest driveway (Building B-1 from the McKinley Avenue driveway, Building B-2 from the Central Avenue driveway at 139th Street, or Building B-3 from the Rosecrans Avenue driveway), which is the most likely occurrence, or can travel through the site utilizing an internal access road that connects each of the buildings. Trucks entering the site from either the Central Avenue or Rosecrans Avenue driveways and destined for either Building B-2 or Building B-3 are also generally expected to exit via the same driveway (no exits are permitted at the Rosecrans Avenue driveway south of Building B-3), while trucks entering the site from any of the three truck access driveways and destined for Building B-1 are expected to exit the site directly using the McKinley Avenue driveway.

Vehicular access into or out of any of the proposed Plan B Project driveways is not anticipated to exhibit any specific issues or difficulties. Central Avenue currently exhibits a median two-way left-turn lane along the project frontage, which, similar to the Plan A Project, will be modified to provide new northbound left-turn lanes at both the 139th Street and Piru Street project driveways (left-turn lanes at both locations are shown previously in Figure 25). Additionally, both project driveways on Central Avenue will be signal controlled, including the driveway at 139th Street, which is proposed to be signalized as part of the project. The Rosecrans Avenue driveway will be restricted to right-turn-only, entry-only operations, and exits from this driveway will not be permitted, thereby reducing traffic movement conflicts at this location. Neither of the proposed new Plan B Project (only) passenger vehicle driveways on Sam Littleton Street will be signalized, but will operate as "full service" driveways; following the project's required improvements to its Sam Littleton Street frontage, this roadway will provide a total 56-foot wide (existing 28 feet north of the centerline, recommended 28-foot roadway south of the centerline), two lane roadway. Adequate visibility is provided in both directions at each of the driveways for exiting vehicles to avoid conflicts with through traffic on this street, and sufficient lane widths will be provided to allow through traffic to pass by project-related vehicles turning left or right into the site; although not proposed at this time, if deemed necessary by the City, the improved roadway width on Sam Littleton Street adjacent to the project site will allow for the installation of exclusive westbound left-turn lanes at each of the project's driveways on this street to channelize project-related left-turning vehicles away from the through traffic flows, further reducing any potential effects on this street. The Project Applicant shall work with the City of Compton to determine if such left-turn lanes are necessary. Further, as with the Plan A Project, the Plan B Project driveway on McKinley Avenue is not expected to be signalized, although due to the proposed right-turn entry/left-turn exit restrictions and relatively light traffic volumes along McKinley Avenue, no substantial congestion at this driveway is anticipated. Finally, as noted earlier, the project

proposes to install a new traffic signal at the intersection of McKinley Avenue and Rosecrans Avenue, which will enhance access to and from the McKinley Avenue driveway.

Therefore, due to the combination of exclusive left-turn channelization, existing and proposed traffic signals, or other driveway operational restrictions that will simplify ingress or egress at the driveways and eliminate or minimize conflicts with on-street traffic, the proposed site access scheme is expected to adequately accommodate project-related traffic, and as such, there are no concerns regarding the proposed Plan B Project driveway locations or their operations. However, to assure that adequate entry and exit capacity is provided to accommodate the highest expected vehicular access demands of the Project during the critical AM and PM peak hours, the operations of each of the site's driveways were analyzed in more detail.

The number of trips anticipated at each of the Plan B Project driveways during these time periods was identified based on the project component (passenger vehicles and truck) trips identified earlier in Table 36 and the individual project component assignment percentages shown previously in Figures 26 through 29. However, the project's truck volumes at the driveways were not adjusted with the previously-described PCE factors, as was done for the calculation of project traffic at each of the 23 study intersections, in order to identify the actual number of vehicles entering and exiting each location. Further, the driveway volumes do not include reductions for the removal of trips generated by the existing site development, since the site's driveways must accommodate all of the Project's anticipated trips, not just the "net" site-related trips on the area roadway system that were used to evaluate the effects of the incremental project-related traffic at each of the study intersections. The proposed Plan B Project is expected to exhibit total "driveway" volumes of approximately 119 total trips (83 inbound, 36 outbound) during the AM peak hour, including 94 passenger vehicle trips (72 inbound, 22 outbound) and 25 truck trips (11 inbound, 14 outbound), with a total of approximately 129 trips (40 inbound, 89 outbound) expected at the project driveways during the PM peak hour, including 102 passenger vehicle trips (28 inbound, 74 outbound) and 27 truck trips (12 inbound, 15 outbound). Individually, the Plan B Project's westernmost driveway on Sam Littleton Street is anticipated to exhibit a total vehicular demand of approximately 46 passenger vehicle-only trips (36 inbound, 10 outbound), while the eastern Sam Littleton Street driveway (near Bahama Avenue) will accommodate a total of approximately 15 passenger vehicle-only trips (11 inbound, 4 outbound) during the AM peak hour. During the PM peak hour, the western driveway on Sam Littleton Street is expected to exhibit a total passenger vehicle-only demand of approximately 50 trips (14 inbound, 36 outbound), with the eastern driveway serving a total of approximately 17 passenger vehicle-only trips (five inbound, 12 outbound). The project driveway on Central Avenue, opposite Piru Street, will also serve as a passenger vehicle-only access location, with a total of approximately 19 trips (14 inbound, 5 outbound) during the AM peak hour and 24 total trips (five inbound, 19 outbound) during the PM peak hour, while the Central Avenue driveway opposite 139th Street, which will provide shared passenger vehicle and truck access, is expected to accommodate a total of 18 trips (entering volumes of four passenger vehicle trips and four truck trips, and exiting volumes of three passenger vehicle trips and seven truck trips) during the AM peak hour, and 20 total trips (inbound volumes of one passenger vehicle trip and four truck trips, and outbound volumes of seven passenger vehicle trips and eight truck trips) during the PM peak hour. The proposed entry-only driveway on Rosecrans Avenue, which will also provide shared access for both passenger vehicles and trucks) is expected to accommodate total vehicular demands of approximately 10 inbound trips (7 passenger vehicle trips and three truck trips) during the AM peak hour, and seven inbound trips (three passenger vehicle trips and four truck trips) during the PM peak hour. The remaining driveway, located on McKinley Avenue, which like the Plan A Project, will also provide truck-only access for the Plan B Project, is anticipated to exhibit a total vehicular demand of approximately 11 truck-only trips (four inbound, seven outbound) during both the AM and PM peak hours.

The three passenger vehicle-only driveways, including both of the proposed driveways on Sam Littleton Street, and the northern driveway on Central Avenue (opposite Piru Street), are anticipated to be equipped with some type of vehicular access control devices, such as ticket dispenser/gate arm controls and/or manned kiosks, at their driveway/street interfaces. However, similar to the conditions described previously for the Plan A Project, none of the remaining site driveways, which will provide either shared passenger vehicle/truck access (the driveways on Central Avenue opposite 139th Street, and on Rosecrans Avenue), or truck-only access (driveway on McKinley Avenue), will exhibit such gates, although a number of security gates are located internal to the project site to control and monitor project-related passenger vehicle and truck traffic circulating within the site and between the various on-site parking areas; the nearest of these internal security gates to any of the site's driveways is at the driveway on McKinley Avenue, with a gate/guard kiosk located approximately 126 feet internal to the site from the property line. Additionally, as also shown in the Plan B site plans, vehicular access into and out of both project driveways on Central Avenue (opposite Piru Street, and opposite 139th Street) will be controlled by traffic signals, including the existing signal at Piru Street, and the proposed new traffic signal at 139th Street. Finally, as with the Plan A Project, the Rosecrans Avenue right-turn entry-only driveway will be uncontrolled.

As noted previously for the Plan A Project, the uncontrolled access at the Rosecrans Avenue driveway is expected to provide an entry capacity of approximately 1,000 vehicles per hour. A review of the peak hour site driveway volumes indicates that the anticipated peak traffic demands at this location during both the AM and PM peak hours will be well below the assumed capacity. Therefore, no significant project-related vehicular queuing or impacts to through traffic flows on Rosecrans Avenue near the driveway are expected.

It is anticipated that the passenger vehicle-only site driveways proposed for the Plan B Project's Sam Littleton Street frontage, which will provide site access for both project employees and visitors, will be equipped with security gates operated via card key (which can be "swiped" on a card reader at the gate to minimize entry times for project employees). These types of gates typically exhibit entry capacities of between 400 and 500 vehicles per hour per lane, based on the actual operational capabilities of the gates themselves. Conversely, although exit capacities for such gates are also a function of the physical operations of the individual gate mechanisms, their operations are more dependent upon the level of traffic/congestion on the frontage streets, which generally control the number of vehicles that can exit the subject driveway to enter into the traffic flow on the site adjacent streets. Sam Littleton Street currently carries a total of between about 300 and 500 vehicles per hour (total of both directions) along the segment fronting the project site during both the AM and PM peak hours. While these volumes are not extraordinarily high, they are anticipated to be sufficient to somewhat reduce the overall exit capacity of each of the proposed Plan B Project driveways, as project-related traffic waits for adequate "gaps" in the traffic on Sam Littleton Street to make a safe exit, particularly for left-turns exiting the site, since such movements require gaps in traffic travelling in both directions (note that the traffic on Sam Littleton Street is not expected to significantly impede westbound left-turn entry moves into these driveways, since such project-related traffic will only have to cross one direction of traffic).

As such, each of the proposed driveways along Sam Littleton Street is expected to exhibit an effective exit capacity of between 350 and 400 vehicles per hour. A review of the anticipated project-related (passenger vehicle-only) traffic demands at each of these driveways indicate that both driveways will easily accommodate the anticipated peak hour demands, and therefore, no significant operational impacts to traffic flows along Sam Littleton Street due to the proposed Plan B Project are anticipated. However, operating gates at these driveways shall be located sufficiently back from the street (minimum of 25 feet into the site from the back of sidewalk or

street curbline) in order to minimize potential queuing onto the street from vehicles entering the project site.

As previously described for the Plan A Project, the entry and exit capacities for the proposed manned security gate controlled truck-only driveway on McKinley Avenue is conservatively assumed to exhibit an entry capacity of approximately 60 vehicles per hour and an exit capacity of approximately 300 vehicles per hour. Again, a review of the peak hour truck traffic volumes utilizing this driveway indicates that its assumed entry and exit capacities are substantially higher than the expected truck traffic demands, and therefore, no significant project-related impacts to traffic operations along McKinley Avenue are expected.

Finally, as also identified previously, both of the Plan B Project's proposed driveways along Central Avenue, including the "shared" driveway along Central Avenue opposite 139th Street, and the passenger vehicle-only driveway opposite Piru Street, are currently or will be controlled by traffic signals, and as such, are expected to exhibit entry capacities of between approximately 1,200 and 1,500 vehicles per hour, and minimum exit capacities of between approximately 850 and 1,000 vehicles per hour (assuming conservatively that the exit lanes at each of these driveways would exhibit a "flashing red" indication during the "green" phase for the opposing 139th Street or Piru Street traffic). However, regardless of whether the exit lanes at these driveways are controlled by a "green" or "flashing red" signal indication, the anticipated project-related entry and exit traffic volumes at each of the two Central Avenue driveways will be substantially lower than even the minimum capacities described above, and as a result, no significant access impacts are anticipated to occur at either of the Plan B Project's Central Avenue driveways.

The left-turn access into the Plan B Project's Central Avenue site driveways was also reviewed, to assure that sufficient capacity and vehicular queuing lengths are provided to prevent "spillover" into the adjacent through lanes and impacts to through traffic flows on Central Avenue. The (northbound) left-turning volumes into the "shared" (passenger vehicles and trucks) Central Avenue driveway at 139th Street are expected to be a total of approximately six vehicles, including two passenger vehicles and four trucks) during the AM peak hour, and a total of approximately five vehicles (one passenger vehicle and four trucks) during the PM peak hour. As such, the Plan B Project's inbound left-turn volumes are expected to be substantially lower than those associated with the Plan A Project (total of about 59 vehicles, including 49 passenger vehicles and 10 trucks, during the AM peak hour, and a total of 30 vehicles, including 18 passenger vehicles and 12 trucks, during the PM peak hour), primarily as a result of additional passenger vehicle driveways provided for the Plan B Project along Sam Littleton Street and at Central Avenue (opposite Piru Street, which is not expected to be an operating driveway under the Plan A Project). Therefore, the previously-described conversion of the existing median two-way left-turn lanes on Central Avenue at both project driveway locations (at 139th Street and at Piru Street) to provide new left-turn channelization of an approximately 155-foot left-turn pocket (plus approximately 60-foot reverse curve striping transition between the new left-turn pocket and the existing median two-way left-turn lane) at both project driveways is expected to also be more than adequate to ensure that the Plan B Project's anticipated peak hour vehicular queues do not encroach into and obstruct traffic flows in the northbound through lanes on Central Avenue, and therefore, no significant left-turn access impacts for the Plan B Project are expected.

Internal (On-Site) Vehicular Circulation

The internal (on-site) vehicular circulation for the Plan B Project was also reviewed to assure that all vehicles, and particularly semi-trailer trucks, can adequately access all necessary areas of the site without difficulty. Plan B Project provides a number of on-site passenger vehicle parking areas located adjacent or proximate to each of the buildings (Building B-1, Building B-2, and

Building B-3) proposed for this development scheme. Passenger vehicle access to and from these parking areas and through the interior of the Plan B Project site is adequate, and no significant issues of concern were identified. Additionally, semi-trailer truck travel paths at or through the critical "choke points" within the site (such as into or out of the site access driveways, or circulating on-site between Building B-1, Building B-2, and/or Building B-3) were reviewed. The internal vehicular circulation scheme for the Plan B Project has been designed to accommodate semi-trailer truck movements at all critical locations within the site, as well as into and out of each of the applicable truck access driveways, without any significant issues. Therefore, the Plan B Project site plan provides adequate site access and internal circulation for passenger vehicles and semi-trailer trucks, and no significant operational impact would occur.

Roadway Improvements

As with the Plan A Project, the Plan B Project development will also be required by the City of Compton to improve the roadways and other transportation facilities fronting the project site, including but not limited to dedications, widenings, landscaping, and installation of sidewalks, to bring these facilities to the rights-of-way and street widths appropriate to their classification. Although the Plan B Project development scheme differs internally from the Plan A Project, and also includes additional vehicular access locations (driveways) along both Sam Littleton Street and Central Avenue (conversion of the Plan A emergency vehicle-only driveway at Piru Street to accommodate passenger vehicles under the Plan B Project development scheme), the street frontages of the two projects along Sam Littleton Street, Central Avenue, Rosecrans Avenue, and McKinley Avenue are identical, and as such, the required roadway improvements described previously for the Plan A Project will also be required of the Plan B Project.

Mitigation Measures

Mitigation Measures MM-TR-1 through MM-TR-5 address cumulative impacts at the affected intersections. The proposed project, by itself, is not anticipated to result in significant impacts at these intersections.

The need to upgrade/replace signal hardware will be determined, on a case-by-case basis for each intersection mitigation improvement, by the appropriate reviewing agency (City of Compton, County, or other jurisdiction) during the preparation of the construction and signal modification plans for those improvements.

MM-TR-1. *El Segundo Boulevard and Central Avenue (Plan A Project Only) –Prior to the issuance of building permits, the applicant shall submit to the City of Compton Director of Public Works/Municipal Utilities and the County of Los Angeles Public Works Department a restriping plan for intersection of El Segundo Boulevard and Central Avenue for review and approval. The restriping plan shall include the restriping of the northbound approach of Central Avenue within the existing roadway width to provide a new exclusive right-turn only lane, in addition to one left-turn lane and two through lanes. Signage shall be installed indicating that buses using the new right-turn lane to access the bus stop would be exempted from the required right turn. Improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing) shall be installed.*

MM-TR-2. *Rosecrans Avenue and Avalon Boulevard (Plan A and Plan B Project) –Prior to the issuance of building permits, the applicant shall submit to the County of Los Angeles Public Works Department a restriping plan for intersection of*

Rosecrans Avenue and Avalon Boulevard for review and approval. The restriping plan shall include the restriping of the northbound approach of Avalon Boulevard within the existing roadway width to install a new right-turn only lane, in addition to one left-turn lane and two through lanes. The existing northbound through lanes on Avalon Boulevard would be narrowed slightly but would be required to maintain a minimum width of 10 feet. No other modifications to the lane widths or alignments are required. Signage shall be installed to indicate that buses using the proposed right-turn lane to access the bus stop would be exempted from the required right turn. Any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing) shall be installed. The installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase to further improve the operations of this intersection.

MM-TR-3. *Rosecrans Avenue and Central Avenue (Plan A and Plan B Project)*

Plan A

Prior to the issuance of building permits, the applicant shall submit to the City of Compton Director of Public Works/Municipal Utilities and the County of Los Angeles Public Works Department a restriping plan for intersection of Rosecrans Avenue and Central Avenue for review and approval. The restriping plan shall include the restriping of the northbound approach of Central Avenue at this intersection to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes, while the southbound approach of Central Avenue shall be modified to convert the existing right-turn only lane to a shared through/right-turn lane, in addition to the two through lanes and one left-turn lane that currently exist on this approach. The southbound "receiving" lanes of Central Avenue, south of Rosecrans Avenue, shall also be modified to install a new "drop lane" for the new southbound shared through/right-turn lane (extending to approximately 144th Street). The eastern curb line of Central Avenue shall be widened slightly (variable widening up to approximately two feet) to provide consistent lane widths for northbound travel and to align the northbound approach lanes with the "receiving" lanes on Central Avenue north of Rosecrans Avenue. New signage shall be installed to indicate that buses using the proposed new right-turn lane to access the bus stop would be exempted from the required right turn. The existing bicycle lanes on both the east and west sides of Central Avenue shall be modified to accommodate the new northbound right-turn only lane and new southbound "drop lane." The existing bicycle lanes shall adhere to standard design criteria for intersection approaches exhibiting both bicycle and right-turn lanes or "drop lanes". Any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing) shall be installed. The installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase to further improve the operations of this intersection. Modifications at this

Plan B

The magnitude of the Plan B Project cumulative impact is less than the Plan A Project. As such, the Plan B Project shall only be required to install the new northbound right-turn only lane (and northbound "overlap" signal phase), in addition to any necessary traffic signal modifications and/or improvements. The restriping plan for this intersection shall be submitted to the City of Compton Director of Public Works/Municipal Utilities and County of Los Angeles Public Works Department for review and approval prior to the issuance of building permits,

MM-TR-4. *Rosecrans Avenue and Wilmington Avenue (Plan A and Plan B Project) – Prior to the issuance of building permits, the applicant shall submit to the City of Compton Director of Public Works/Municipal Utilities a restriping plan for intersection of Rosecrans Avenue and Wilmington Avenue for review and approval. The restriping plan shall include the restriping of the northbound approach of Wilmington Avenue to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes. The existing 24-foot wide curb lane along the northbound approach of Wilmington Avenue shall be modified to include a right-turn only lane along with a through lane. This mitigation measure can be implemented within the existing roadway width of Wilmington Avenue without the need for street widenings or additional rights-of-way. New signage shall be installed indicating that buses using the new right-turn lane to access this bus stop are exempt from the required right turn. Any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing), including the implementation of a new "overlap" phase for the new northbound right-turn lane occurring concurrently with the existing westbound left-turn phase for Rosecrans Avenue traffic, shall be installed.*

MM-TR-5. *Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue (Plan A Project Only) –Prior to the issuance of building permits, the applicant shall submit to the City of Compton Director of Public Works/Municipal Utilities and City of Carson a restriping plan for intersection of Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue for review and approval. The restriping plan shall include the restriping of the westbound approach of Artesia Boulevard, which also serves the westbound off-ramp for the Artesia (SR-91) Freeway, to add a new right-turn only lane, in addition to the existing left-turn, shared through/left-turn, and shared through/right-turn lanes. Additionally, the curb radius at the northeast corner of the intersection shall be increased (to approximately 45 feet), and the existing raised median island on the north leg of Central Avenue shall be shortened by approximately 40 feet, in order to accommodate the turning characteristics of large semi-trailer trucks, which frequently utilize the freeway off-ramp at this location to access local destinations. Any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing) shall be installed.*

MM-TR-6. *The City shall either establish a fair share program to collect payments from other development projects that also contribute to cumulative impacts at the affected intersections identified in Mitigation Measures **MM-TR-1** through **MM-TR-5**, and/or reimburse the Project Applicant for costs in excess of their fair share that may be incurred in implementing these improvements. The fair share contribution for the proposed Project is anticipated to range from*

*approximately 12 to 55 percent of the total costs of the various improvements, depending on the Project plan (Site Plan A or Site Plan B) and the location of the proposed improvement, including the two projects within the City of Compton and adjacent to the site of the proposed Brickyard Commerce Center project. Such payments would be used to implement some or all of the five cumulative impact mitigation measures identified earlier (specifically, at El Segundo Boulevard and Central Avenue, Rosecrans Avenue and Avalon Boulevard, Rosecrans Avenue and Central Avenue, Rosecrans Avenue and Wilmington Avenue, and Artesia Boulevard/WB SR-91 Freeway Ramps and Central Avenue) as appropriate, and/or to reimburse the Brickyard Commerce Center project applicant for any costs in excess of their required "fair share" contributions that may be incurred in implementing the recommended improvements. The actual costs of implementing Mitigation Measures **MM-TR-1** through **MM-TR-5** and the associated fair share contributions applicable to the Plan A and Plan B projects shall be determined after review of the improvements and preparation of details plans and costs estimates for each measure. In the interest of ensuring that these intersection improvements are fully implemented as soon as possible, no later than issuance of the Certificate of Occupancy for the Project, the Project Applicant shall fund the balance of the cost of these improvements (beyond the required fair share contribution) and fully implement the recommended measures as a public benefit through the Project's Development Agreement.*

Level of Significance After Mitigation

The effectiveness of the recommended cumulative impact mitigation measures was evaluated using the same CMA intersection analysis techniques as described previously, but assuming that the recommended cumulative impact mitigation measures described earlier for each location were installed. The results of the "With Cumulative Development Plus Mitigation" analysis are summarized in Table 43 (CMA Analysis Summary Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions) for both the Plan A and Plan B Project conditions.

As shown in Table 43, the recommended intersection and roadway improvements described earlier are anticipated to reduce the potential significant cumulative traffic impacts at each of the affected intersections for both the proposed Plan A and Plan B site development schemes to less-than-significant levels, and in fact, are expected to improve the operations (CMA value) of several of the (cumulatively) impacted locations to better than the forecast future (year 2017) "without project" conditions during one or both of the peak hours. Further, although in general, these improvements will not result in improvements to the levels of service of the intersections, the measures recommended for the intersection of Rosecrans Avenue and Wilmington Avenue are anticipated to improve the operations of that location from its forecast LOS F conditions to near its existing LOS E (CMA = 0.966) operations during the PM peak hour, although it will continue to exhibit an undesirable level of operation during this period (but exhibiting acceptable LOS D conditions during the AM peak hour). Additionally, the recommended improvements at the intersection of Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue (Plan A Project only) are anticipated to improve the operations of this location to better than its existing conditions during the PM peak hour (post-improvement CMA of 0.759 versus existing CMA of 0.776, although both reflect LOS C operations), with only a minor (and non-significant) residual increase in the CMA value during the AM peak hour following implementation of the recommended intersection improvement measures. Therefore, based on these analyses, the recommended cumulative impact mitigation measures described earlier will be sufficient to

reduce the potential cumulative traffic impacts resulting from all known ongoing or proposed development in the study area, including either the Plan A and Plan B development schemes to less-than-significant levels, and as such, no additional roadway or intersection improvements are required.

Mitigation Measure TR-3, under the Plan A project, would require the removal of a total of approximately 10 unmetered and unstriped on-street parking spaces along the west side of the street. However, these on-street parking spaces are located adjacent to an existing fast food restaurant (McDonalds) and retail strip mall, both of which provide substantial off-street parking for their patrons and employees, and as such, the removal of the on-street parking is not expected to result in any significant secondary impacts.

Mitigation Measure TR-3, under the Plan A project, would require minor roadway widenings can be implemented within the existing rights-of-way on the east side of Central Avenue without significantly reducing the existing sidewalk widths or requiring relocation of the existing bus stop on this approach,

Mitigation Measure TR-3, under the Plan A project, would require existing bicycle lanes on both the east and west sides of Central Avenue to be modified to accommodate the new northbound right-turn only lane and new southbound “drop lane, although no significant “secondary” bicycle facility impacts would occur.

Table 43
Critical Movement Analysis ("CMA") Summary
Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions
(City of Compton/County of Los Angeles Intersections Only)

Int. No.	Intersection	Peak Hour	Existing Plus Ambient Growth Only		With Cumulative Development				With Cumulative Development Plus Cumulative Mitigation		
			CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
Plan A Project											
8	El Segundo Blvd. and Central Ave.	AM	0.891	D	0.891	D	0.000		0.891	D	0.000
		PM	0.892	D	**0.902**	**E**	**0.010**	*	0.851	D	-0.041
16	Rosecrans Ave. and Avalon Blvd.	AM	0.603	B	0.629	B	0.026		0.608	B	0.005
		PM	0.793	C	0.827	D	0.034	*	0.780	C	-0.013
17	Rosecrans Ave. and Central Ave.	AM	0.775	C	0.820	D	0.045	*	0.780	C	0.005
		PM	0.785	C	0.822	D	0.037	*	0.791	C	0.006
18	Rosecrans Ave. and Wilmington Ave.	AM	0.879	D	0.897	D	0.018		0.897	D	0.018
		PM	**1.008**	**F**	**1.024**	**F**	**0.016**	*	**0.978**	**E**	**-0.030**
22	Artesia Blvd./SR-91 WB Ramps and Central Ave.	AM	0.843	D	0.856	D	0.013		0.813	D	-0.030
		PM	0.809	D	0.831	D	0.022	*	0.759	C	-0.050
Plan B Project											
16	Rosecrans Ave. and Avalon Blvd.	AM	0.603	B	0.625	B	0.022		0.604	B	0.001
		PM	0.793	C	0.825	D	0.032	*	0.777	C	-0.016
17	Rosecrans Ave. and Central Ave.	AM	0.775	C	0.796	C	0.021		0.796	C	0.021
		PM	0.785	C	0.812	D	0.027	*	0.781	C	-0.004
18	Rosecrans Ave. and Wilmington Ave.	AM	0.879	D	0.895	D	0.016		0.895	D	0.016
		PM	**1.008**	**F**	**1.023**	**F**	**0.015**	*	**0.974**	**E**	**-0.034**

Notes:
"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997. Intersections with resulting Level of Service E or F are shown in* ***bold.***
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Revised Site Plan A

Less-Than-Significant with Mitigation Incorporated. The traffic study scope and methodology used in the evaluation of Revised Site Plan A, including study intersections, truck trip generation and distribution characteristics based on the ITE High-cube Warehouse/Distribution Center land use and Fontana *Truck Trip Generation Study (August 2003)*, Passenger Car Equivalency (PCE) conversions, trip adjustments, geographic trip distribution, traffic assignment, baseline traffic counts, related projects and background traffic growth, and CMA methodology, is the same as used in the previous evaluation of the Site Plan A Project. The same traffic signals would be installed under the Revised Site Plan A Project as with the previous Site Plan A Project. The results of the analysis of traffic associated with the Revised Site Plan A Project are summarized below. The full study of Revised Site Plan A, *Brickyard Commerce Center Traffic Study,*

December, 2014, prepared by Hirsch/Green Transportation Consulting, Inc., is contained in Appendix K-2 to this Initial Study.

Construction Traffic

Construction activities associated with Revised Site Plan A would be similar to Site Plans A and B. Accordingly, no significant impacts would be associated with hauling activity, since the activities will occur outside the peak commute traffic periods, when overall traffic volumes on the area roadways are reduced from their peak hour levels. Deliveries and construction worker parking would be accommodated within the Project Site and would not significantly affect surrounding roadways. Construction traffic impacts associated with Revised Site Plan A would be less than significant.

Trip Generation

Operational activities associated with the Revised Site Plan A Project would be similar to the Site Plan A and Site Plan B Projects. Based on the same traffic-generating characteristics as associated with the Site Plan A and Site Plan B projects, and the intended operations of the Project, the Revised Site Plan A Project is expected to result in a total increase in net site-related traffic of approximately 1,587 PCE trips per day, including approximately a net reduction of 3 PCE trips (five inbound, reduction of eight outbound) during the AM peak hour, and an increase of 93 net PCE trips (20 inbound, 73 outbound) during the PM peak hour, as shown in Table 24a (Net Site-Related Trip Generation Estimates – Revised Site Plan A Project. This level of traffic generation represents a reduction of approximately 23% in automobile and truck trips from the traffic generation resulting from the Site Plan A Project. This level of net trip generation was used to evaluate the potential impacts of the Revised Site Plan A Project on the surrounding street and highway network.

Table 24a
Net Site-Related Trip Generation Estimates – Revised Site Plan A Project

Size/Use	Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
Proposed Revised Site Plan A Project Trips							
Total Proposed Plan A Project Trips (in PCE)	**2,541**	**106**	**61**	**167**	**62**	**119**	**181**
Total Proposed Plan A Project Automobile Trips	*1,543*	*76*	*25*	*101*	*30*	*80*	*110*
Total Proposed Plan A Project Truck Trips (in PCE)	*998*	*30*	*36*	*66*	*32*	*39*	*71*
Project Site 2014 Uses Trips							
Total Project Site 2014 Trips (in PCE)	**954**	**101**	**69**	**170**	**42**	**46**	**88**
Total Project Site 2014 Automobile Trips	*174*	*10*	*11*	*21*	*8*	*18*	*26*
Total Project Site 2014 Truck Trips (in PCE)	*780*	*91*	*58*	*149*	*34*	*28*	*62*
Net New Plan A Site-Related Automobile Trips	1,369	66	14	80	22	62	84
Net New Plan A Site-Related Truck Trips (in PCE)	218	(61)	(22)	(83)	(2)	11	9
Total Net New Plan A Site-Related Trips (in PCE)	**1,587**	**5**	**(8)**	**(3)**	**20**	**73**	**93**

Note: Values in (parentheses) indicate reductions from existing trips.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Intersection Impacts

Existing Plus Revised Site Plan A Project (Year 2014) Conditions

Table 28a identifies the operations at each of the study intersections before and after the development of the Revised Site Plan A Project, including incremental project-related changes in CMA and/or LOS values. The potential incremental project-related effects to the current traffic conditions in the study area were then identified by comparing the existing (year 2014) "no project" conditions at each of the 23 study intersections to the anticipated "With Revised Site Plan A Project" conditions. As indicated in Table 28a, the incremental traffic (and its associated effects on the CMA values) resulting from the development of the Revised Site Plan A Project is not expected to result in any changes to the existing (year 2014 "no project") operating conditions (LOS) at any of the 23 study intersections during either the AM or PM peak hours. Based on the significance criteria used to evaluate the Site Plan A and Site Plan B projects, Revised Site Plan A Project impacts (year 2014) would be less than significant.

Table 28a
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Revised Site Plan A Project Conditions

Int. No.	Intersection	Peak Hour	No Project (2014)		Existing With Revised Plan A Project (2014)		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps	AM	0.598	A	0.597	A	-0.001
	and Central Avenue [1]	PM	0.797	C	0.797	C	0.000
2	I-105 Freeway EB On/Off-Ramps	AM	0.545	A	0.540	A	-0.005
	and Central Avenue [1]	PM	0.498	A	0.496	A	-0.002
3	I-105 Freeway EB On/Off-Ramps	AM	0.694	B	0.691	B	-0.003
	and Wilmington Avenue	PM	0.634	B	0.638	B	0.004
4	120th Street/119th Street	AM	0.571	A	0.569	A	-0.002
	and Wilmington Avenue	PM	0.595	A	0.596	A	0.001
5	El Segundo Boulevard	AM	0.472	A	0.472	A	0.000
	and Figueroa Street [1]	PM	0.634	B	0.634	B	0.000
6	El Segundo Boulevard	AM	0.444	A	0.444	A	0.000
	and Main Street	PM	0.519	A	0.519	A	0.000
7	El Segundo Boulevard	AM	0.625	B	0.625	B	0.000
	and Avalon Boulevard	PM	0.809	D	0.810	D	0.001
8	El Segundo Boulevard	AM	0.855	D	0.848	D	-0.007
	and Central Avenue	PM	0.856	D	0.856	D	0.000
9	El Segundo Boulevard	AM	0.569	A	0.569	A	0.000
	and Compton Avenue	PM	0.527	A	0.527	A	0.000
10	El Segundo Boulevard	AM	0.652	B	0.649	B	-0.003
	and Wilmington Avenue	PM	0.766	C	0.769	C	0.003
11	135th Street	AM	0.320	A	0.320	A	0.000

Table 28a
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Revised Site Plan A Project Conditions

Int. No.	Intersection	Peak Hour	No Project (2014)		Existing With Revised Plan A Project (2014)		
			CMA	LOS	CMA	LOS	Impact
-	and Avalon Boulevard	PM	0.504	A	0.506	A	0.002
12	Sam Littleton Street/ Stockwell Street (135th Street)	AM	0.496	A	0.492	A	-0.004
	and Central Avenue	PM	0.571	A	0.565	A	-0.006
13	Rosecrans Avenue	AM	0.736	C	0.738	C	0.002
	and I-110 Freeway SB On/Off-Ramps [1]	PM	0.644	B	0.655	B	0.011
14	Rosecrans Avenue	AM	0.525	A	0.528	A	0.003
	and I-110 Freeway NB Off-Ramp [1]	PM	0.509	A	0.519	A	0.010
1	Rosecrans Avenue	AM	0.455	A	0.456	A	0.001
	and Main Street	PM	0.575	A	0.579	A	0.004
16	Rosecrans Avenue	AM	0.578	A	0.580	A	0.002
	and Avalon Boulevard	PM	0.761	C	0.766	C	0.005
17	Rosecrans Avenue	AM	0.743	C	0.746	C	0.003
	and Central Avenue	PM	0.752	C	0.767	C	0.015
18	Rosecrans Avenue	AM	0.844	D	0.839	D	-0.005
	and Wilmington Avenue	**PM**	**0.966**	**E**	**0.970**	**E**	**0.004**
19	Compton Boulevard	AM	0.724	C	0.725	C	0.001
	and Central Avenue	PM	0.731	C	0.733	C	0.002
20	Alondra Boulevard	AM	0.695	B	0.696	B	0.001
	and Central Avenue	PM	0.858	D	0.860	D	0.002
21	Greenleaf Boulevard	AM	0.445	A	0.453	A	0.008
	and Central Avenue [2]	PM	0.479	A	0.482	A	0.003
22	Artesia Boulevard (WB)/SR-91 Freeway WB On/Off-Ramps	AM	0.808	D	0.813	D	0.005
	and Central Avenue [2]	PM	0.776	C	0.785	C	0.009
23	Artesia Boulevard (EB)/SR-91 Freeway EB On/Off-Ramps	AM	0.759	C	0.759	C	0.000
	and Central Avenue [2]	PM	0.834	D	0.842	D	0.008

Notes:

[1] City of Los Angeles intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.

[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.

"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997, or LADOT Traffic Study Policies and Procedures, June 2013.*
***Bold** indicates resulting intersection Level of Service E or F.*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Analysis of Future (Year 2017) Traffic Conditions

Revised Plan A Project Intersection Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

As shown in Table 31a (CMA Summary Future (2017) Without and With Revised Site Plan A Project Conditions, City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections), the incremental traffic changes resulting from the development of the Revised Site Plan A Project is not anticipated to result in any project-specific significant impacts at any of the intersections under the forecast future (year 2017) conditions. Therefore, no project-specific mitigation measures are warranted for any of these 18 study locations.

Revised Plan A Project Intersection Analysis (2017) – City of Los Angeles Intersections

As shown in in Table 32a (CMA Summary Future (2017) Without and With Revised Site Plan A Project Conditions-City of Los Angeles Intersections), the Revised Site Plan A Project will not result in significant impacts at any of the five City of Los Angeles intersections studied under LADOT's "future" analysis scenarios, and as a result, no project-specific mitigation measures are warranted for any of these locations.

As shown in Tables 31a and 32a, the development of the Revised Site Plan A Project will not result in significant Project impacts at any of the 23 study intersections (regardless of their jurisdiction). As such, no project-specific mitigation measures are warranted at any of the 23 study intersections.

Table 31a
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan A Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing (2014)					Cumulative (2017)			Project %
			Plus Ambient (2017)		Plus Revised Site Plan A Project (2017)			Plus Related Projects (2017)			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Total	
3	I-105 Freeway EB On/Off-Ramps	AM	0.724	C	0.721	C	-0.003	0.728	C	0.004	n/a [3]
	and Wilmington Avenue	PM	0.662	B	0.665	B	0.003	0.671	B	0.009	33.3%
4	120th Street/119th Street	AM	0.595	A	0.593	A	-0.002	0.594	A	-0.001	n/a [3]
	and Wilmington Avenue	PM	0.622	B	0.623	B	0.001	0.624	B	0.002	50.0%
6	El Segundo Boulevard	AM	0.463	A	0.463	A	0.000	0.465	A	0.002	0.0%
	and Main Street	PM	0.542	A	0.543	A	0.001	0.543	A	0.001	100.0%
7	El Segundo Boulevard	AM	0.651	B	0.651	B	0.000	0.658	B	0.007	0.0%
	and Avalon Boulevard	PM	0.842	D	0.844	D	0.002	0.849	D	0.007	28.6%
8	El Segundo Boulevard	AM	0.891	D	0.884	D	-0.007	0.888	D	-0.003	n/a [3]
	and Central Avenue	PM	0.892	D	0.892	D	0.000	0.899	D	0.007	0.0%

Table 31a
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan A Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing (2014)					Cumulative (2017)			Project %
			Plus Ambient (2017)		Plus Revised Site Plan A Project (2017)			Plus Related Projects (2017)			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Total	
9	El Segundo Boulevard and Compton Avenue	AM	0.593	A	0.593	A	0.000	0.593	A	0.000	0.0%
		PM	0.549	A	0.549	A	0.000	0.549	A	0.000	0.0%
10	El Segundo Boulevard and Wilmington Avenue	AM	0.679	B	0.676	B	-0.003	0.679	B	0.000	n/a [3]
		PM	0.800	C	0.802	D	0.002	0.806	D	0.006	33.3%
11	135th Street and Avalon Boulevard	AM	0.334	A	0.334	A	0.000	0.339	A	0.005	0.0%
		PM	0.526	A	0.528	A	0.002	0.531	A	0.005	40.0%
12	Sam Littleton Street/Stockwell Street (135th Street) and Central Avenue	AM	0.517	A	0.512	A	-0.005	0.522	A	0.005	n/a [3]
		PM	0.594	A	0.589	A	-0.005	0.601	B	0.007	n/a [3]
15	Rosecrans Avenue and Main Street	AM	0.474	A	0.475	A	0.001	0.484	A	0.010	10.0%
		PM	0.600	A	0.604	B	0.004	0.612	B	0.012	33.3%
16	Rosecrans Avenue and Avalon Boulevard	AM	0.603	B	0.605	B	0.002	0.627	B	0.024	8.3%
		PM	0.793	C	0.797	C	0.004	0.825	D	0.032*	12.5%
17	Rosecrans Avenue and Central Avenue	AM	0.775	C	0.778	C	0.003	0.804	D	0.029*	10.3%
		PM	0.785	C	0.799	C	0.014	0.817	D	0.032*	43.8%
18	Rosecrans Avenue and Wilmington Avenue	AM	0.879	D	0.875	D	-0.004	0.892	D	0.013	-30.8%
		PM	**1.008**	**F**	**1.011**	**F**	**0.003**	**1.023**	**F**	**0.015***	20.0%
19	Compton Boulevard and Central Avenue	AM	0.755	C	0.756	C	0.001	0.764	C	0.009	11.1%
		PM	0.762	C	0.764	C	0.002	0.769	C	0.007	28.6%
20	Alondra Boulevard and Central Avenue	AM	0.723	C	0.724	C	0.001	0.732	C	0.009	11.1%
		PM	0.893	D	0.896	D	0.003	0.900	D	0.007	42.9%
21	Greenleaf Boulevard and Central Avenue [2]	AM	0.464	A	0.472	A	0.008	0.479	A	0.015	53.3%
		PM	0.500	A	0.502	A	0.002	0.503	A	0.003	66.7%
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue [2]	AM	0.843	D	0.848	D	0.005	0.854	D	0.011	45.5%
		PM	0.809	D	0.818	D	0.009	0.828	D	0.019	47.4%
23	Artesia Boulevard/SR-91 Freeway EB	AM	0.792	C	0.792	C	0.000	0.795	C	0.003	0.0%

Table 31a
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan A Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing (2014)					Cumulative (2017)			Project %
			Plus Ambient (2017)		Plus Revised Site Plan A Project (2017)			Plus Related Projects (2017)			
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Total	
	On/Off-Ramps										
	and Central Avenue [2]	PM	0.870	D	0.879	D	0.009	0.885	D	0.015	60.0%

Notes:
[1] Includes proposed Plan A Project and related projects.
[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
[3] Proposed project (Plan A) results in reduction in CMA value (improved intersection operations). No contribution toward cumulative impacts.
"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997.*
*Intersections with resulting Level of Service E or F are shown in **bold**.*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Table 32a
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan A Project Conditions
City of Los Angeles Intersections

Int. No.	Intersection	Peak Hour	Without Project		With Plan A Project		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps and Central Avenue	AM	0.598	A	0.597	A	-0.001
		PM	0.805	D	0.806	D	0.001
2	I-105 Freeway EB On/Off-Ramps and Central Avenue	AM	0.544	A	0.539	A	-0.005
		PM	0.495	A	0.493	A	-0.002
5	El Segundo Boulevard and Figueroa Street	AM	0.466	A	0.466	A	0.000
		PM	0.634	B	0.634	B	0.000
13	Rosecrans Avenue and I-110 Freeway SB On/Off-Ramps	AM	0.756	C	0.758	C	0.002
		PM	0.665	B	0.677	B	0.012
14	Rosecrans Avenue and I-110 Freeway NB Off-Ramp	AM	0.535	A	0.538	A	0.003
		PM	0.520	A	0.529	A	0.009

Notes:
"Without Project" condition consists of Existing plus Ambient Growth plus Related Projects traffic.
"" Indicates significant impact per LADOT Traffic Study Policies and Procedures, June 2013 (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Cumulative (Plan A) Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

As also shown in Table 31a, the anticipated traffic additions resulting from cumulative development in the study area (including traffic generated by the four identified related projects and the Revised Site Plan A project itself) could produce significant cumulative impacts at a total of three intersections located within the City of Compton or County of Los Angeles, including Rosecrans Avenue and Avalon Boulevard, and Rosecrans Avenue and Wilmington Avenue, both of which could be significantly impacted during the PM peak hour only, and the intersection of Rosecrans Avenue and Central Avenue, which is anticipated to be significantly impacted during both peak hours.

Although as noted previously the Revised Site Plan A project by itself is not expected to result in significant impacts at any of the 18 study intersections under the jurisdiction of the City of Compton and/or County of Los Angeles, it will contribute incrementally to each of the three cumulative impacts to some degree. Therefore, the Revised Site Plan A Project's specific "contributions" toward each of the three cumulative impacts were also identified, as a percentage of the total cumulative impact (not cumulative volumes; it is important to make this distinction, as the effects of the incremental traffic resulting from the proposed Plan A project or from the related projects on the *operations* of an intersection are a more definitive assessment of their associated impacts than is the number of trips). As also shown in Table 31a, the Revised Site Plan A project itself is estimated to contribute approximately 12.5 percent toward the total cumulative impact at the intersection of Rosecrans Avenue and Avalon Boulevard, and about 20 percent of the cumulative impact at the intersection of Rosecrans Avenue and Wilmington Avenue, during the PM peak hour (when the Plan A project's significant impacts at both locations occurs), while the Plan A project is estimated to be responsible for just under 44 percent of the total cumulative impact at the intersection of Rosecrans Avenue and Central Avenue (for the highest project-related impact, which also occurs during the PM peak hour; the proposed Plan A project only contributes about 10.3 percent of the total cumulative impact at this intersection during the AM peak hour).

The reduction in vehicular trips (automobile and truck) associated with Revised Site Plan A (as compared to the original Site Plan A) result in elimination of significant cumulative impacts at the intersections of El Segundo Boulevard and Central Avenue and Artesia Boulevard/SR 91 Freeway WB On/Off Ramps and Central Avenue. As the Revised Site Plan A no longer results in cumulative impact at these intersections, no mitigation measures are required.

Supplemental Analysis (Plan A Project) – Shared City of Compton/City of Carson Intersections

As shown in Table 33a, application of the City of Carson's significance criteria indicates that no significant Project-related impacts will occur within its jurisdiction, and as a result, similar to the results identified in Table 32a, no Project-related traffic mitigation measures are warranted.

Table 33a
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan A Project Conditions
City of Carson Intersections

Int.	Intersection	Peak	Without Project		With Revised Site Plan A Project		
			CMA	LOS	CMA	LOS	Impact
21	Greenleaf Boulevard and Central Avenue	AM	0.470	A	0.479	A	0.009
		PM	0.501	A	0.503	A	0.002
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue	AM	0.849	D	0.854	D	0.005
		PM	0.820	D	0.828	D	0.008
23	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps and Central Avenue	AM	0.794	C	0.795	C	0.001
		PM	0.877	D	0.885	D	0.008

Notes:
"Without Project" condition consists of Existing plus Ambient Growth plus Related Projects traffic.
""Indicates significant impact per City of Carson (Los Angeles County CMP) criteria (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Street Segment Traffic Impact Analysis

As shown in Table 35a, each of the street segments analyzed currently operate at acceptable LOS D or better conditions. Therefore, the existing transportation infrastructure provides sufficient capacity to accommodate the current traffic demands in the study area at acceptable operational levels.

The effects of both project-related traffic and anticipated "cumulative" traffic growth (from both annual ambient traffic increases and from the four related projects in the study area) were also examined, and the results of these evaluations are also shown in Table 35a. The Revised Site Plan A Project will not result in any significant impacts to the area street segments under the forecast year 2017 conditions. Therefore, based on the results of this analysis, no significant Project-related impacts will occur on any of the street segments in the project vicinity, and no Project-related street segment mitigation measures are warranted.

Table 35a
Street Traffic Impact Analysis Summary – Revised Site Plan A Project
Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service

Street/ Segment	Existing (2014)							Future (2017)					
	No Project	V/C	LOS	Project Traffic *	With Project	V/C	LOS	Without Project	V/C	LOS	With Project	V/C	LOS
Sam Littleton Street/135th Street													
Stanford Ave. to McKinley Ave. [1]	4,478	0.299	A	55	4,533	0.302	A	4,795	0.320	A	4,850	0.323	A
McKinley Ave. to Corlett Ave. [2]	3,641	0.364	A	55	3,696	0.370	A	3,942	0.394	A	3,997	0.400	A
Corlett Ave. to Central Ave. [2]	3,786	0.379	A	55	3,841	0.384	A	4,093	0.409	A	4,148	0.415	A
McKinley Ave.													
136th St. to 137th St. [2]	677	0.068	A	0	677	0.068	A	978	0.098	A	978	0.098	A
139th St. to Rosecrans Ave. [2]	1,350	0.135	A	449	1,799	0.180	A	2,817	0.282	A	3,266	0.327	A
Central Ave.													
Sam Littleton St. to El Segundo Blvd. [3]	25,529	0.851	D	-15	25,514	0.850	D	26,798	0.893	D	26,783	0.893	D
Compton Blvd. to Rosecrans Ave. [4]	21,613	0.569	A	428	22,041	0.580	A	22,832	0.601	B	23,260	0.612	B
Rosecrans Ave.													
Avalon Blvd. to Stanford Ave. [5]	25,844	0.584	A	693	26,537	0.600	A	28,080	0.635	B	28,733	0.650	B

Notes:
** Net volumes for proposed Plan A Project; includes removal of existing site uses. Adjusted for PCE. Same for both "Existing" and "Future" conditions.*
[1] 2-lane Collector Roadway, assumed design capacity of 15,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[2] 2-lane Local Street, assumed design capacity of 10,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[3] 4-lane undivided Major Highway, assumed design capacity of 30,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 4-lane divided Major Highway, assumed design capacity of 38,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 6-lane undivided Major Highway, assumed design capacity of 44,250 vpd equates to 75% of maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Parking and Access

Parking Requirements and Parking Supply

Automobile Parking

Based on the ITE "warehousing" parking demand fitted curve equation, the 1,154,000 square foot Revised Site Plan A project is expected to exhibit a peak vehicular parking demand of approximately 472 spaces. The Revised Site Plan A development scheme proposes to provide a total of approximately 608 vehicle parking spaces, located primarily within a large surface lot containing a total of approximately 575 spaces near the center of the site, with the remaining spaces provided in a smaller 33-space surface lot located to the south of the primary parking lot. As a result, the proposed Plan A project will provide about 136 spaces more than the anticipated maximum demand of 472 spaces, and as such, no off-site vehicular parking impacts or project-related parking "overflow" onto adjacent commercial streets or parking facilities, or into the adjacent residential neighborhoods resulting from insufficient on-site vehicular parking are expected. Additionally, the provision of the approximately 136 "excess" parking spaces (compared to the anticipated peak demands) is anticipated to allow for the addition of temporary "seasonal" workers during peak seasonal (typically, yearend) shipping periods, without resulting in an on-site parking shortfall. Finally, all automobile parking spaces for the Revised Site Plan A Project will be provided via "standard" sized spaces (nine feet wide, 20 feet long, pursuant to the City's design requirements); no compact vehicle parking spaces are proposed.

Truck Parking/Loading Spaces

Based on the proposed 1,154,000 square foot footprint of the Revised Site Plan A development scheme, the application of the City of Perris truck/trailer parking space ratio would result in a requirement of a total of approximately 231 such spaces. The Revised Site Plan A project will include a total of approximately 544 "container" parking spaces (which will be utilized both for truck parking and for storage of temporarily unused trailers), including approximately 437 such spaces surrounding Building A-1 plus approximately 107 spaces provided in the southern flag lot area located south of Building A-1. As such, the Revised Site Plan A project will provide approximately 323 more truck parking/trailer storage spaces (about 140 percent more) than the number of such spaces that would be required using the City of Perris parking ratios. Further, the 544 "container" parking spaces provided by the Revised Site Plan A project equates to more than 2.6 truck parking/trailer storage spaces for each of the approximately 208 total loading docks proposed (in excess of the actual loading dock truck spaces themselves), as compared to the City of Perris requirements, which equate to only about 1.11 spaces per loading dock. Therefore, the Revised Site Plan A project is expected to provide substantially more than adequate on-site truck parking/trailer storage spaces to accommodate its anticipated demands, and as a result, no off-site parking impacts to the nearby residential or commercial areas are anticipated.

Vehicular Driveway Access and Operations

Passenger vehicle and truck access to the Revised Site Plan A Project would be the same as described for the Site Plan A project. The Revised Site Plan A Project site plan would adequately provide for both passenger vehicle and semi-trailer truck (as well as for smaller single-unit trucks) site access and internal circulation, and no significant issues in this regard are anticipated.

Roadway Improvements

In addition to the development of the on-site facilities for the proposed Plan A Project, a number of modifications to the existing roadway facilities fronting the Project site, including but not limited to dedications, widenings, landscaping, and installation of sidewalks, will also be implemented. The City and County require that development projects within its jurisdiction improve the roadways and other transportation facilities adjacent to their respective sites to the rights-of-way and street widths appropriate to each street's classification, and based on information provided by the City and County, the same roadway improvements will be required of the Revised Site Plan A Project as would be required of the Site Plan A Project.

Revised Site Plan B

Less-Than-Significant with Mitigation Incorporated. The traffic study scope and methodology used in the evaluation of Revised Site Plan B, including study intersections, truck trip generation and distribution characteristics based on the ITE High-cube Warehouse/Distribution Center land use and Fontana *Truck Trip Generation Study (August 2003)*, Passenger Car Equivalency (PCE) conversions, trip adjustments, geographic trip distribution, traffic assignment, baseline traffic counts, related projects and background traffic growth, and CMA methodology, is the same as used in the evaluation of the Site Plan A and Site Plan B Projects. The same traffic signals would be installed under the Revised Site Plan B Project as with the Site Plan B Project. The results of the analysis of traffic associated with the Revised Site Plan B Project are summarized below. The full study of Revised Site Plan B, *Brickyard Commerce Center Traffic Study, December, 2014*, prepared by Hirsch/Green Transportation Consulting, Inc., is contained in Appendix K-2 to this Initial Study.

Construction Traffic

Construction activities associated with Revised Site Plan B would be similar to Site Plans A and B. Accordingly, no significant impacts would be associated with hauling activity, since the activities will occur outside the peak commute traffic periods, when overall traffic volumes on the area roadways are reduced from their peak hour levels. Deliveries and construction worker parking would be accommodated within the Project Site and would not significantly affect surrounding roadways. Construction traffic impacts associated with Revised Site Plan B would be less than significant.

Traffic Generation

The trip generation estimates for the Revised Site Plan B Project were calculated using the same methodologies and assumptions previously described for the Revised Site Plan A Project. Because the Revised Site Plan A and Revised Site Plan B Projects would be the same size (1,154,000 square feet), the number of trips expected to be generated by the Revised Site Plan B Project would be the same as shown in Table 24a (Revised Site Plan A Project Trip Generation Estimates).

Intersection Impacts

Existing Plus Revised Site Plan B Project (Year 2014) Conditions

Table 38b identifies the operations at each of the study intersections before and after the development of the Revised Site Plan B Project, including incremental project-related changes in CMA and/or LOS values. The potential incremental project-related effects to the current traffic

conditions in the study area were then identified by comparing the existing (year 2014) "no project" conditions at each of the 23 study intersections to the anticipated "With Revised Site Plan B Project" conditions. As indicated in Table 38a, the incremental traffic (and its associated effects on the CMA values) resulting from the development of the Revised Site Plan B Project is not expected to result in any changes to the existing (year 2014 "no project") operating conditions (LOS) at any of the 23 study intersections during either the AM or PM peak hours. Based on the significance criteria used to evaluate the Site Plan A and Site Plan B projects, Revised Site Plan B Project impacts (year 2014) would be less than significant.

Table 38b
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Revised Site Plan B Project Conditions

			No Project (2014)		With Revised Site Plan B Project (2014)		
Int.	Intersection	Peak	CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps and Central Avenue [1]	AM	0.598	A	0.597	A	-0.001
		PM	0.797	C	0.797	C	0.000
2	I-105 Freeway EB On/Off-Ramps and Central Avenue [1]	AM	0.545	A	0.539	A	-0.006
		PM	0.498	A	0.496	A	-0.002
3	I-105 Freeway EB On/Off-Ramps and Wilmington Avenue	AM	0.694	B	0.694	B	0.000
		PM	0.634	B	0.640	B	0.006
4	120th Street/119th Street and Wilmington Avenue	AM	0.571	A	0.569	A	-0.002
		PM	0.595	A	0.597	A	0.002
5	El Segundo Boulevard and Figueroa Street [1]	AM	0.472	A	0.472	A	0.000
		PM	0.634	B	0.634	B	0.000
6	El Segundo Boulevard and Main Street	AM	0.444	A	0.444	A	0.000
		PM	0.519	A	0.520	A	0.001
7	El Segundo Boulevard and Avalon Boulevard	AM	0.625	B	0.625	B	0.000
		PM	0.809	D	0.810	D	0.001
8	El Segundo Boulevard and Central Avenue	AM	0.855	D	0.848	D	-0.007
		PM	0.856	D	0.856	D	0.000
9	El Segundo Boulevard and Compton Avenue	AM	0.569	A	0.569	A	0.000
		PM	0.527	A	0.527	A	0.000
10	El Segundo Boulevard and Wilmington Avenue	AM	0.652	B	0.649	B	-0.003
		PM	0.766	C	0.769	C	0.003
11	135th Street and Avalon Boulevard	AM	0.320	A	0.321	A	0.001
		PM	0.504	A	0.505	A	0.001
12	Sam Littleton Street/Stockwell Street (135th Street and Central Avenue	AM	0.496	A	0.505	A	0.009
		PM	0.571	A	0.590	A	0.019
13	Rosecrans Avenue and I-110 Freeway SB On/Off-	AM	0.736	C	0.737	C	0.001

Table 38b
Critical Movement Analysis ("CMA") Summary
Existing (2014) Without and With Revised Site Plan B Project Conditions

Int.	Intersection	Peak	No Project (2014) CMA	No Project (2014) LOS	With Revised Site Plan B Project (2014) CMA	With Revised Site Plan B Project (2014) LOS	Impact
	Ramps [1]	PM	0.644	B	0.655	B	0.011
14	Rosecrans Avenue and I-110 Freeway NB Off-Ramp [1]	AM	0.525	A	0.528	A	0.003
		PM	0.509	A	0.518	A	0.009
15	Rosecrans Avenue and Main Street	AM	0.455	A	0.456	A	0.001
		PM	0.575	A	0.579	A	0.004
16	Rosecrans Avenue and Avalon Boulevard	AM	0.578	A	0.579	A	0.001
		PM	0.761	C	0.766	C	0.005
17	Rosecrans Avenue and Central Avenue	AM	0.743	C	0.733	C	-0.010
		PM	0.752	C	0.764	C	0.012
18	Rosecrans Avenue and Wilmington Avenue	AM	0.844	D	0.841	D	-0.003
		PM	**0.966**	**E**	**0.970**	**E**	**0.004**
19	Compton Boulevard and Central Avenue	AM	0.724	C	0.725	C	0.001
		PM	0.731	C	0.733	C	0.002
20	Alondra Boulevard and Central Avenue	AM	0.695	B	0.696	B	0.001
		PM	0.858	D	0.860	D	0.002
21	Greenleaf Boulevard and Central Avenue [2]	AM	0.445	A	0.453	A	0.008
		PM	0.479	A	0.482	A	0.003
22	Artesia Boulevard (WB)/SR-91 Freeway WB On/Off-Ramps and Central Avenue [2]	AM	0.808	D	0.813	D	0.005
		PM	0.776	C	0.785	C	0.009
23	Artesia Boulevard (EB)/SR-91 Freeway EB On/Off-Ramps and Central Avenue [2]	AM	0.759	C	0.759	C	0.000
		PM	0.834	D	0.842	D	0.008

Notes:
[1]City of Los Angeles intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.
"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997, or LADOT Traffic Study Policies and Procedures, June 2013. Intersections with resulting Level of Service E or F are shown in **bold.***
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Analysis of Future (Year 2017) Traffic Conditions

Revised Plan B Project Intersection Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

As shown in Table 39b (Future (2017) Without and With Revised Site Plan B Project Conditions, City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections),

the incremental traffic changes resulting from the development of the Revised Site Plan B Project are not anticipated to result in any project-specific significant impacts at any of the intersections under the forecast future (year 2017) conditions. Therefore, no project-specific mitigation measures are warranted for any of these 18 study locations.

Revised Plan B Project Intersection Analysis (2017) – City of Los Angeles Intersections

As shown in in Table 40b (CMA Summary Future (2017) Without and With Revised Site Plan B Project Conditions-City of Los Angeles Intersections), the Revised Site Plan B Project will not result in significant impacts at any of the five City of Los Angeles intersections studied under LADOT's "future" analysis scenarios, and as a result, no project-specific mitigation measures are warranted for any of these locations.

As shown in Tables 39b and 40b, the development of the Revised Site Plan B Project will not result in significant Project impacts at any of the 23 study intersections (regardless of their jurisdiction), As such, no project-specific mitigation measures are warranted at any of the 23 study intersections.

Table 39b
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan B Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int. #	Intersection	Peak Hour	Existing Plus Ambient (2017)		Existing Plus Ambient Plus Revised Site Plan B Project (2017)			Cumulative (2017)[1]		Total Impact	Project % of Total Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS		
	I-105 Freeway EB On/Off-Ramps	AM	0.724	C	0.724	C	0.000	0.731	C	0.007	0.0%
3	and Wilmington Avenue	PM	0.662	B	0.667	B	0.005	0.673	B	0.011	45.5%
	120th Street/119th Street	AM	0.595	A	0.593	A	-0.002	0.594	A	-0.001	n/a [3]
4	and Wilmington Avenue	PM	0.622	B	0.624	B	0.002	0.625	B	0.003	66.7%
	El Segundo Boulevard	AM	0.463	A	0.463	A	0.000	0.465	A	0.002	0.0%
6	and Main Street	PM	0.542	A	0.543	A	0.001	0.543	A	0.001	100.0%
	El Segundo Boulevard	AM	0.651	B	0.652	B	0.001	0.659	B	0.008	12.5%
7	and Avalon Boulevard	PM	0.842	D	0.844	D	0.002	0.847	D	0.005	40.0%
	El Segundo Boulevard	AM	0.891	D	0.884	D	-0.007	0.888	D	-0.003	n/a [3]
8	and Central Avenue	PM	0.892	D	0.892	D	0.000	0.899	D	0.007	0.0%
	El Segundo Boulevard	AM	0.593	A	0.593	A	0.000	0.593	A	0.000	0.0%
9	and Compton Avenue	PM	0.549	A	0.549	A	0.000	0.549	A	0.000	0.0%
	El Segundo Boulevard	AM	0.679	B	0.676	B	-0.003	0.679	B	0.000	n/a [3]
10	and Wilmington Avenue	PM	0.800	C	0.802	D	0.002	0.806	D	0.006	33.3%
11	135th Street	AM	0.334	A	0.335	A	0.001	0.339	A	0.005	20.0%

Table 39b
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan B Project Conditions
City of Compton, County of Los Angeles, City of Carson, and Shared Jurisdiction Intersections

Int #	Intersection	Peak Hour	Existing Plus Ambient (2017)		Existing Plus Ambient Plus Revised Site Plan B Project (2017)			Cumulative (2017)[1]		Total Impact	Project % of Total Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS		
	and Avalon Blvd	PM	0.526	A	0.527	A	0.001	0.531	A	0.005	20.0%
	Sam Littleton Street/Stockwell Street (135th Street)	AM	0.517	A	0.525	A	0.008	0.535	A	0.018	44.4%
12	and Central Avenue	PM	0.594	A	0.614	B	0.020	0.627	B	0.033	60.6%
	Rosecrans Avenue	AM	0.474	A	0.475	A	0.001	0.483	A	0.009	11.1%
15	and Main Street	PM	0.600	A	0.603	B	0.003	0.612	B	0.012	25.0%
	Rosecrans Avenue	AM	0.603	B	0.604	B	0.001	0.626	B	0.023	4.3%
16	and Avalon Boulevard	PM	0.793	C	0.797	C	0.004	0.825	D	0.032*	12.5%
	Rosecrans Avenue	AM	0.775	C	0.765	C	-0.010	0.791	C	0.016	n/a [3]
17	and Central Avenue	PM	0.785	C	0.797	C	0.012	0.815	D	0.030*	40.0%
	Rosecrans Avenue	AM	0.879	D	0.878	D	-0.001	0.895	D	0.016	n/a [3]
18	and Wilmington Avenue	PM	**1.008**	**F**	**1.011**	**F**	**0.003**	**1.023**	**F**	0.015*	20.0%
	Compton Boulevard	AM	0.755	C	0.756	C	0.001	0.764	C	0.009	11.1%
19	and Central Avenue	PM	0.762	C	0.764	C	0.002	0.769	C	0.007	28.6%
	Alondra Boulevard	AM	0.723	C	0.724	C	0.001	0.732	C	0.009	11.1%
20	and Central Avenue	PM	0.893	D	0.896	D	0.003	0.900	D	0.007	42.9%
	Greenleaf Boulevard	AM	0.464	A	0.472	A	0.008	0.479	A	0.015	53.3%
21	and Central Avenue [2]	PM	0.500	A	0.502	A	0.002	0.503	A	0.003	66.7%
	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps	AM	0.843	D	0.848	D	0.005	0.854	D	0.011	45.5%
22	and Central Avenue [2]	PM	0.809	D	0.818	D	0.009	0.828	D	0.019	47.4%
	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps	AM	0.792	C	0.792	C	0.000	0.795	C	0.003	0.0%
23	and Central Avenue [2]	PM	0.870	D	0.879	D	0.009	0.885	D	0.015	60.0%

Notes:

[1] Includes ambient traffic growth, proposed Plan B Project and related projects.

[2] Shared City of Compton/City of Carson intersection; all others are City of Compton, Los Angeles County, or Shared Compton/County intersections, unless otherwise noted.

[3] Project (Plan B) results in reduction in CMA value (improved intersection operations). No contribution toward cumulative impacts.

"" Indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997. Intersections with resulting Level of Service E or F are shown in **bold**.*

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Table 40b
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan B Project Conditions
City of Los Angeles Intersections

Int. No.	Intersection	Peak Hour	Without Project		With Revised Site Plan B Project		
			CMA	LOS	CMA	LOS	Impact
1	I-105 Freeway WB On/Off-Ramps	AM	0.598	A	0.597	A	-0.001
	and Central Avenue	PM	0.805	D	0.806	D	0.001
2	I-105 Freeway EB On/Off-Ramps	AM	0.544	A	0.539	A	-0.005
	and Central Avenue	PM	0.495	A	0.492	A	-0.003
5	El Segundo Boulevard	AM	0.466	A	0.466	A	0.000
	and Figueroa Street	PM	0.634	B	0.635	B	0.001
13	Rosecrans Avenue	AM	0.756	C	0.757	C	0.001
	and I-110 Freeway SB On/Off-Ramps	PM	0.665	B	0.676	B	0.011
14	Rosecrans Avenue	AM	0.535	A	0.538	A	0.003
	and I-110 Freeway NB Off-Ramp	PM	0.520	A	0.528	A	0.008

Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Cumulative Impact Analysis (2017) – City of Compton/County of Los Angeles Intersections

As summarized in Table 39b, the anticipated cumulative development traffic additions to these intersections, including the effects of the Revised Site Plan B project, could produce potential significant cumulative impacts at a total of three intersections: Rosecrans Avenue and Avalon Boulevard, Rosecrans Avenue and Central Avenue, and Rosecrans Avenue and Wilmington Avenue, each of which are impacted during the PM peak hour only. Further, although as noted earlier the Revised Site Plan B project itself is not expected to result in significant impacts at any of the study intersections under the forecast future (year 2017) conditions. The Revised Site Plan B project will contribute incrementally to the three cumulative impacts to some degree. Therefore, the magnitudes of the proposed Plan B project's specific contributions toward the total cumulative impacts (again identified as a percentage of the total cumulative impact) were also identified. As also indicated in Table 39a, the Revised Site Plan B project itself is estimated to contribute a little more than 12 percent of the total cumulative PM peak hour impact at the intersection of Rosecrans Avenue and Avalon Boulevard, about 20 percent of the impact at Rosecrans Avenue and Wilmington Avenue, and about 40 percent of the cumulative impact at the intersection of Rosecrans Avenue and Central Avenue.

Supplemental Analysis – Shared City of Compton/City of Carson Intersections

As shown in Table 41b, the addition of the net traffic resulting from the Revised Site Plan B Project is not expected to result in the deterioration of any of the forecast future (2017) "Without Project" conditions at any of the three study intersections shared with the City of Carson beyond those resulting from anticipated ambient traffic growth or traffic generated by related projects, and will not create any new "undesirable" conditions at any of the three intersections. Further, based on the City of Carson's significance criteria, no significant Revised Site Plan B Project-related impacts will occur within that City's jurisdiction, and no project-related traffic mitigation measures are warranted.

Table 41b
Critical Movement Analysis ("CMA") Summary
Future (2017) Without and With Revised Site Plan B Project Conditions
City of Carson Intersections

Int.	Intersection	Peak	Without Project		With Revised Site Plan B Project		
			CMA	LOS	CMA	LOS	Impact
21	Greenleaf Boulevard and Central Avenue	AM	0.470	A	0.479	A	0.009
		PM	0.501	A	0.503	A	0.002
22	Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue	AM	0.849	D	0.854	D	0.005
		PM	0.820	D	0.828	D	0.008
23	Artesia Boulevard/SR-91 Freeway EB On/Off-Ramps and Central Avenue	AM	0.794	C	0.795	C	0.001
		PM	0.877	D	0.885	D	0.008

Notes:
"Without Project" includes ambient growth and related projects traffic.
""Indicates significant impact per City of Carson (Los Angeles County CMP) criteria (if applicable).*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Street Segment Traffic Impact Analysis

As shown in Table 42b, each of the street segments analyzed currently operate at acceptable LOS D or better conditions. Therefore, the existing transportation infrastructure provides sufficient capacity to accommodate the current traffic demands in the study area at acceptable operational levels. Therefore, the Revised Site Plan B Project will not result in significant impacts to any of these facilities, and as such, no Revised Site Plan B Project-related street segment mitigation measures are warranted.

Table 42b
Street Traffic Impact Analysis Summary – Revised Site Plan B Project
Existing (2014) and Future (2017) Average Daily Traffic Volumes and Levels of Service

Street/Segment	Existing (2014)							Future (2017)					
	No Project	V/C	LOS	Project Traffic *	With Project	V/C	LOS	Without Project	V/C	LOS	With Project	V/C	LOS
Sam Littleton Street/135th Street													
Stanford Ave. to McKinley Ave. [1]	4,478	0.299	A	135	4,613	0.308	A	4,795	0.320	A	4,930	0.329	A
McKinley Ave. to Corlett Ave. [2]	3,641	0.364	A	367	4,008	0.401	A	3,942	0.394	A	4,309	0.431	A
Corlett Ave. to Central Ave. [2]	3,786	0.379	A	581	4,367	0.437	A	4,093	0.409	A	4,674	0.467	A

McKinley Ave.													
136th St. to 137th St. [2]	677	0.068	A	232	909	0.091	A	978	0.098	A	1,210	0.121	A
139th St. to Rosecrans Ave. [2]	1,350	0.135	A	660	2,010	0.201	A	2,817	0.282	A	3,477	0.348	A
Central Ave.													
Sam Littleton St. to El Segundo Blvd. [3]	25,529	0.851	D	-16	25,513	0.850	D	26,798	0.893	D	26,782	0.893	D
Compton Blvd. to Rosecrans Ave. [4]	21,613	0.569	A	429	22,042	0.580	A	22,832	0.601	B	23,261	0.612	B
Rosecrans Ave.													
Avalon Blvd. to Stanford Ave. [5]	25,844	0.584	A	565	26,409	0.597	A	28,080	0.635	B	28,645	0.647	B

Notes:
** Net volumes for proposed Plan B Project; includes removal of Project Site 2014 uses. Adjusted for PCE. Same for both "Existing" and "Future" conditions.*
[1] 2-lane Collector Roadway, assumed design capacity of 15,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[2] 2-lane Local Street, assumed design capacity of 10,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[3] 4-lane undivided Major Highway, assumed design capacity of 30,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 4-lane divided Major Highway, assumed design capacity of 38,000 vpd equates to maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
[4] 6-lane undivided Major Highway, assumed design capacity of 44,250 vpd equates to 75% of maximum LOS E value shown in Table 4-2, page C 4-14, Circulation Element, Draft Compton General Plan 2030.
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

Parking and Access

Automobile Parking

Since the Revised Site Plan B project will contain the same warehouse/distribution center facilities as the Revised Site Plan A project, it is expected to exhibit the same type of "per unit area" parking demands, and as such, the amount of automobile parking necessary to meet the anticipated parking needs of the Revised Site Plan B project was determined through the same application of the ITE *Parking Generation* fitted curve equation used to identify the parking needs for the Revised Site Plan A project. Therefore, based on this assumption, the approximately 1,154,000 total square foot Plan B project is estimated to need a total of approximately 472 parking spaces, including approximately 238 spaces for the approximately 582,400 square foot Building B-1, and approximately 234 spaces (rounded up) for the approximately 571,600 square foot Building B-2. The Revised Site Plan B project site will provide a total of approximately 577 parking spaces, approximately 105 spaces more than are expected to be necessary. Individually, Building B-1 will provide a total of approximately 270 automobile parking spaces, or about 32 more than its anticipated demand, while Building B-2 will provide a total of approximately 307 spaces, about 73 spaces in excess of its expected parking demands. Additionally, the amount of automobile parking provided both for the overall Revised Site Plan B project site as well as for each of its individual buildings is expected to be sufficient to accommodate the parking demands associated with a total employment level of between 500 and 600 employees (in two shifts of about 250 to 300 employees each, divided approximately evenly between Buildings B-1 and B-2, or about 125 to 150 employees per shift per building)

without experiencing an on-site parking shortfall, even during shift change periods. As a result, no Revised Site Plan B project-related parking "spillover" onto nearby streets due to insufficient on-site vehicular parking supplies is expected. Further, as with the Revised Site Plan A project, the provision of about 105 "surplus" parking spaces (compared to the anticipated peak demand) will allow for the addition of temporary "seasonal" workers without resulting in an on-site parking shortfall. Finally, like the Revised Site Plan A project, all of the Revised Site Plan B project on-site automobile parking spaces will be "standard" sized spaces (nine feet wide, 20 feet long).

Truck Parking/Loading Spaces

The Revised Site Plan B project will provide a total of approximately 421 "container" parking spaces (used for both truck parking and trailer storage), including approximately 168 such spaces located adjacent to Building B-1 (100 spaces on the west side of the building, comprised of 50 "tandem" spaces, and 68 spaces on the east site), approximately 146 spaces surrounding Building B-2 (71 spaces on the east side and 75 spaces on the west side of the building), plus approximately 107 spaces provided in the southern flag lot area located south of Building B-1. This number of truck/trailer parking and storage spaces is approximately 190 spaces more (about 82 percent more) than the 231 spaces that would be required of the Revised Site Plan B project (as a whole) using the City of Perris parking ratios, and would also exceed the anticipated need for such spaces for the Revised Site Plan B project buildings individually, with approximately 51 "excess" spaces for Building B-1 and approximately 32 "excess" spaces for Building B-2 (not including the 107 "container" parking spaces located in the southern flag lot area of the project site, which are available to both buildings). Further, the 421 total "container" parking spaces provided equates to an overall site parking ratio of nearly 2.12 spaces for each of the approximately 199 total loading docks proposed in the Revised Site Plan B project (88 docks in Building B-1, 111 docks in Building B-2), nearly double the 1.16 spaces per loading dock based on the City of Perris ratios. Individually, Building B-1 will provide approximately 1.91 spaces per loading dock, while Building B-1 will provide about 1.32 spaces per dock (again not including the "flag lot" spaces), again individually exceeding the City of Perris truck/trailer parking space requirements. Therefore, the Revised Site Plan B project will provide adequate on-site truck parking/trailer storage spaces to accommodate its expected demands for such spaces, and no off-site parking impacts in the residential or commercial areas adjacent to the project site are anticipated.

Vehicular Driveway Access and Operations

Passenger vehicle and truck access to the Revised Site Plan B Project would be the same as described for the Site Plan B project. The Revised Site Plan B Project site plan would adequately provide for both passenger vehicle and semi-trailer truck (as well as for smaller single-unit trucks) site access and internal circulation, and no significant issues in this regard are anticipated.

Roadway Improvements

In addition to the development of the on-site facilities for the Revised Site Plan B Project, a number of modifications to the existing roadway facilities fronting the Project site, including but not limited to dedications, widenings, landscaping, and installation of sidewalks, will also be implemented. The City and County require that development projects within their jurisdiction improve the roadways and other transportation facilities adjacent to their respective sites to the rights-of-way and street widths appropriate to each street's classification, and based on information provided by the City and County, the same roadway improvements will be required of the Revised Site Plan B Project as would be required of the Site Plan B Project.

Mitigation Measures

Mitigation Measures MM-TR-8 through MM-TR-11 would address cumulative impacts at the affected intersections that would result from the Revised Site Plan A and Revised Site Plan B projects. The Revised Site Plan A and Revised Site Plan B projects, by themselves, would not result in significant impacts at these intersections.

The need to upgrade/replace signal hardware will be determined, on a case-by-case basis for each intersection mitigation improvement, by the appropriate reviewing agency (City of Compton, County, or other jurisdiction) during the preparation of the construction and signal modification plans for those improvements.

MM-TR-8. *Rosecrans Avenue and Avalon Boulevard – The northbound approach of Avalon Boulevard at Rosecrans Avenue shall be restriped within the existing roadway width to install a new right-turn only lane, in addition to the existing single left-turn lane and two through lanes. This improvement will require that the northbound through lanes on Avalon Boulevard be narrowed slightly from their existing widths (although still providing an acceptable 10-foot width), although no substantial modifications to the northbound lane alignments are necessary. The northbound approach of Avalon Boulevard at this intersection also exhibits an existing bus stop, and as such, signage shall be installed to indicate that buses using the proposed new right-turn lane to access the bus stop will be exempted from the required right turn. The proposed mitigation measure will also include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing). The existing traffic signal at this intersection currently provides exclusive left-turn phasing for east-west travel (Rosecrans Avenue approaches), and the installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase, to further improve the operations of this intersection.*

MM-TR-9. *Rosecrans Avenue and Central Avenue – The potential cumulative impact at this location is also anticipated to occur with the development of either the Revised Site Plan A or Revised Site Plan B projects, although to different degrees.*

Revised Site Plan A

In order to address the impacts associated with the Revised Site Plan A project, which are expected during both the AM and PM peak hours, the northbound approach of Central Avenue at this intersection shall be restriped to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes, while the southbound approach of Central Avenue shall be modified to convert the existing right-turn only lane to a shared through/right-turn lane, in addition to the two through lanes and one left-turn lane that currently exist on this approach. The southbound "receiving" lanes of Central Avenue, south of Rosecrans Avenue, will also be modified to install a new "drop lane" for the new southbound shared through/right-turn lane (extending to approximately 144th Street), which will require the removal of a total of approximately 10 unmetered and unstriped on-street parking spaces along the west side of the street. However, these on-street parking spaces are located adjacent to an existing fast food restaurant (McDonalds) and retail

strip mall, both of which provide substantial off-street parking for their patrons and employees, and as such, the removal of the on-street parking is not expected to result in any significant secondary impacts.

The recommended improvements at this location will also require that the eastern curb line of Central Avenue be widened slightly (variable widening up to approximately two feet) to provide consistent lane widths for northbound travel and to align the northbound approach lanes with the "receiving" lanes on Central Avenue north of Rosecrans Avenue, although these minor roadway widenings can be implemented within the existing rights-of-way on the east side of Central Avenue without significantly reducing the existing sidewalk widths or requiring relocation of the existing bus stop on this approach, although new signage should also be included as part of this improvement to indicate that buses using the proposed new right-turn lane to access the bus stop will be exempted from the required right turn. The improvement will also modify the existing bicycle lanes on both the east and west sides of Central Avenue in order to accommodate the proposed new northbound right-turn only lane and new southbound "drop lane" (while adhering to standard design criteria for intersection approaches exhibiting both bicycle and right-turn lanes or "drop lanes"), although no significant "secondary" bicycle facility impacts are expected. Finally, these recommended intersection improvements will also include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing); the existing traffic signal at this intersection currently provides exclusive left-turn phasing for eastbound-westbound travel, and the installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase, further improving the operations of this intersection.

Revised Site Plan B

The Revised Site Plan B project also results in a significant cumulative impact at this location, although the Revised Site Plan B project impact is expected to occur only during the PM peak hour, due to a slightly different site access configuration and resulting changes to the Revised Site Plan B project traffic patterns travelling through this intersection compared to the Revised Site Plan A project. As such, the Revised Site Plan B project cumulative mitigation is not as extensive, and includes only the implementation of the new northbound right-turn only lane (and its associated roadway widening and northbound "overlap" signal phase), in addition to any necessary traffic signal modifications and/or improvements. The modification to convert the existing southbound right-turn only lane to a shared through/right-turn lane described above for the Revised Site Plan A project mitigation improvement, which is necessary to address the Revised Site Plan A project's AM peak hour impact at this intersection, is not necessary for the Revised Site Plan B project.

MM-TR-10. *Rosecrans Avenue and Wilmington Avenue – To address the potential cumulative impacts at this location, which are again expected to occur with either the Revised Site Plan A or Revised Site Plan B project, the northbound approach of Wilmington Avenue shall be restriped to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes. The*

northbound approach of Wilmington Avenue currently exhibits an approximately 24 foot wide curb lane, which shall be modified to provide the proposed right-turn only lane along with a through lane, and as such, this proposed measure can be implemented within the existing roadway width of Wilmington Avenue without the need for street widenings or additional rights-of-way. There are currently no bicycle lanes present on this segment of Wilmington Avenue, although an existing bus stop is located on the northbound approach of the street just south of Rosecrans Avenue, and as such, new signage shall be installed indicating that buses using the proposed new right-turn lane to access this bus stop are exempt from the required right turn. This measure shall include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing), including the recommended implementation of a new "overlap" phase for the new northbound right-turn lane occurring concurrently with the existing westbound left-turn phase for Rosecrans Avenue traffic..

MM-TR-11. *The City shall either establish a fair share program to collect payments from other development projects that also contribute to cumulative impacts at the affected intersections identified in Mitigation Measures **MM-TR-8** through **MM-TR-10**, and/or reimburse the Project Applicant for costs in excess of their fair share that may be incurred in implementing these improvements. The fair share contribution for the proposed Project is anticipated to range from approximately 12 to 55 percent of the total costs of the various improvements, depending on the Project plan (Site Plan A or Site Plan B) and the location of the proposed improvement, including the two projects within the City of Compton and adjacent to the site of the proposed Brickyard Commerce Center project. Such payments would be used to implement some or all of the three cumulative impact mitigation measures identified as appropriate, and/or to reimburse the Brickyard Commerce Center project applicant for any costs in excess of their required "fair share" contributions that may be incurred in implementing the recommended improvements. The actual costs of implementing Mitigation Measures **MM-TR-8** through **MM-TR-10** and the associated fair share contributions applicable to the Revised Site Plan A and Revised Site Plan B projects shall be determined after review of the improvements and preparation of details plans and costs estimates for each measure. In the interest of ensuring that these intersection improvements are fully implemented as soon as possible, no later than issuance of the Certificate of Occupancy for the Project, the Project Applicant shall fund the balance of the cost of these improvements (beyond the required fair share contribution) and fully implement the recommended measures as a public benefit through the Project's Development Agreement.*

Level of Significance After Mitigation

The results of the "With Cumulative Development Plus Mitigation" analysis are summarized in Table 43a (CMA Analysis Summary Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions) for both the Revised Site Plan A and Revised Site Plan B Project conditions.

As shown in Table 43a, the recommended cumulative impact mitigation measures described earlier will be sufficient to reduce the potential cumulative traffic impacts resulting from all known

ongoing or proposed development in the study area, including either the Revised Site Plan A and Revised Site Plan B development schemes to less-than-significant levels, and as such, no additional roadway or intersection improvements are required.

Table 43a
Critical Movement Analysis ("CMA") Summary
Future (2017) With Cumulative Development Plus Cumulative Mitigation Conditions
(City of Compton/County of Los Angeles Intersections Only)

Int. No.	Intersection	Peak Hour	Existing Plus Ambient Growth Only		With Cumulative Development				With Cumulative Development Plus Cumulative Mitigation		
			CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
Plan A Project											
16	Rosecrans Ave. and Avalon Blvd.	AM	0.603	B	0.627	B	0.024		0.606	B	0.003
		PM	0.793	C	0.825	D	0.032	*	0.778	C	-0.015
17	Rosecrans Ave. and Central Ave.	AM	0.775	C	0.804	D	0.029	*	0.763	C	-0.012
		PM	0.785	C	0.817	D	0.032	*	0.786	C	0.001
18	Rosecrans Ave. and Wilmington Ave.	AM	0.879	D	0.892	D	0.013		0.892	D	0.013
		PM	**1.008**	**F**	**1.023**	**F**	**0.015**	*	**0.973**	**E**	**-0.035**
Plan B Project											
16	Rosecrans Ave. and Avalon Blvd.	AM	0.603	B	0.626	B	0.023		0.605	B	0.002
		PM	0.793	C	0.825	D	0.032	*	0.777	C	-0.016
17	Rosecrans Ave. and Central Ave.	AM	0.775	C	0.791	C	0.016		0.791	C	0.016
		PM	0.785	C	0.815	D	0.030	*	0.784	C	-0.001
18	Rosecrans Ave. and Wilmington Ave.	AM	0.879	D	0.895	D	0.016		0.895	D	0.016
		PM	**1.008**	**F**	**1.023**	**F**	**0.015**	*	**0.973**	**E**	**-0.035**

Notes:
"" indicates significant impact per Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997. Intersections with resulting Level of Service E or F are shown in **bold**.*
Source: Hirsch/Green Transportation Consulting, Inc., 2014.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less-Than-Significant Impact. To address increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Los Angeles County CMP was enacted to provide the analytical basis for transportation decisions through the State Transportation Improvement Program ("STIP") process. A countywide approach has been established by the Metropolitan Transportation Authority ("Metro"), the local CMP agency, to implement the statutory requirements of the CMP, and has identified a network of key roadways and intersections, including all state highways and principal arterials within the County, and has established procedures for monitoring and tracking Level of Service standards throughout the network. The CMP project traffic impact analysis ("TIA") guidelines require detailed analyses of all CMP arterial monitoring intersections where a project could add a total of 50 or more trips (sum of

all intersection approaches) during either peak hour, as well as for all freeway segments where a project could add 150 or more trips in either direction during the peak hours.

Plan A CMP Impacts

CMP Arterial Monitoring Intersection Impacts

The current (2010) CMP identifies a total of four arterial monitoring intersections within approximately three miles of the Project site. Two of the CMP intersections are located within the City of Compton, one is in the City of Lynwood, and the fourth is located in the City of Gardena. These four CMP arterial monitoring intersections are listed below.

- Alameda Street and Compton Boulevard (City of Compton)
- Alameda Street and SR-91 Freeway EB On/Off-Ramps (City of Compton)
- Alameda Street and Imperial Highway (City of Lynwood)
- Artesia Boulevard and Vermont Avenue (City of Gardena)

As shown previously in Table 24, the proposed Plan A Project is not expected to generate a total 50 net trips during the AM peak hour (49 net PCE-adjusted trips), although during the PM peak hour, the proposed Plan A Project is expected to generate a total of 149 net PCE-adjusted trips. Even if all project-related traffic during the AM peak hour were to travel through any or all of the intersections (a highly unlikely event, since as described in more detail later in this section, project traffic is expected to arrive at and depart from the project site from multiple directions, with only portions of its traffic affecting any particular intersection), the Plan A Project would not, and could not, meet the CMP's minimum 50-trip threshold at any of the four nearby CMP arterial monitoring intersections during the AM peak hour, and as such, no detailed CMP arterial monitoring impact analysis is warranted for this time period.

However, during the PM peak hour, the Plan A Project is expected to generate approximately 149 net PCE-adjusted trips, and as such, it is possible that 50 or more project-related trips could travel through one or more of the CMP arterial monitoring locations. Therefore, the potential for Project-related impacts to each of the four CMP locations was evaluated during this time period. A review of the project's anticipated traffic travel patterns and net traffic volumes into, out of, and through the study area, indicates that Project traffic is expected to disperse throughout the area roadway network outside the immediate study vicinity, and that incremental net Project-related traffic additions to any of the CMP monitoring intersections identified previously are expected to be substantially less than the CMP's 50-trip threshold. Specifically, Figure 24 shows that a total of only about 20 net new PCE Project-related trips (both directions) are expected to travel beyond the study area from the study intersection of Rosecrans Avenue and Wilmington Avenue and which could potentially affect the CMP arterial monitoring locations at both Alameda Street and Compton Boulevard, and Alameda Street and the SR-91 Freeway ramps during the PM peak hour (based on east/west project traffic on Rosecrans Avenue; north/south project traffic at Rosecrans Avenue and Wilmington Avenue travels to and from the SR-91 Freeway via Wilmington Avenue, and is not expected to affect either the Alameda Street and Compton Boulevard, or Alameda Street and the SR-91 Freeway ramps CMP arterial monitoring intersections).

Similarly, a total of only about six net PCE-adjusted project-related trips are expected to travel outside the study area during the PM peak hour west of the I-110 Freeway (from the study intersection of Rosecrans Avenue and the I-110 SB On/Off-Ramps), and which could potentially affect the CMP arterial monitoring intersection at Artesia Boulevard and Vermont Avenue. Finally, no measurable project-related traffic is expected to travel to or from the northeast of the study area through the remaining CMP intersection at Alameda Avenue and Imperial Highway during the PM

peak hour, although it is possible that some of the east-west oriented project trips noted earlier at Rosecrans Avenue and Wilmington Avenue could access this CMP location.

These project traffic estimates are considered to be highly conservative, since all project-related traffic traveling into or out of the study area in the vicinity of each of the CMP arterial monitoring locations was assumed to travel through these intersections, although it is likely that project traffic will disperse along other roadways outside the study area, reducing the amount of potential project traffic actually reaching the CMP arterial monitoring locations. However, even using these conservative values, the potential net project-related traffic additions to any of the four CMP intersections in the general study area are expected to be substantially below the CMP's minimum 50-trip threshold for requiring a detailed analysis. Further, even these conservative trip estimates are not expected to result in significant impacts at any of the CMP monitoring locations; the net volumes are simply too small to produce measurable effects. Therefore, based on these evaluations, the net PCE-adjusted project-related trip additions through the CMP intersections nearest the project site will be well below the levels at which a significant impact would be created or anticipated, and no further analyses are warranted.

CMP Freeway Segment Impacts

An examination was also made of the potential for project-related freeway impacts within the project study area. The CMP requires that detailed freeway impact analyses be prepared whenever a project could be anticipated to add 150 or more peak hour trips in any direction to the area freeway system. As shown previously in Table 24, the proposed Plan A Project is expected to generate fewer than 150 total net trips during both the AM and PM peak hours, with maximum directional traffic of 38 PCE-adjusted outbound trips during the AM peak hour and of 111 PCE-adjusted outbound trips during the PM peak hour. Therefore, even if all project traffic were assigned to the area freeways, the project's incremental trip additions would be well below the CMP's 150-trip threshold. However, as shown by the project's general geographic trip distributions in Figures 18 and 19, only about one-quarter to one-third of the Project's total trips are expected to utilize any of the area freeways, further reducing the potential project-related traffic additions to any of the freeways in the project vicinity. Since the proposed Plan A Project will not approach the minimum CMP directional freeway trip thresholds, no significant freeway mainline impacts are expected, and no further analysis is required.

Plan B CMP Impacts

CMP Arterial Monitoring Intersection Impacts

As shown previously in Table 37, the proposed Plan B Project is not expected to generate a total 50 net trips during the AM peak hour, and in fact, results in an anticipated net reduction of approximately 12 PCE-adjusted trips (reduction of 1 inbound, reduction of 11 outbound). Therefore, as with the Plan A Project analyzed earlier in this study, the Plan B Project would not, and could not, meet the CMP's minimum 50-trip threshold at any of the CMP arterial monitoring intersections during this time period, even if all of the anticipated project-related traffic were to travel through each of these intersections. However, during the PM peak hour, the proposed Plan B Project is expected to generate a total of approximately 83 net PCE-adjusted trips, and as such, while unlikely, it is possible that 50 or more of these project-related trips could travel through one or more of the CMP arterial monitoring locations. As a result, the potential Plan B Project-related impacts to each of the CMP intersections were evaluated during this time period.

As with the Plan A Project, the Plan B potential net project-related traffic additions to any of the four CMP intersections in the general study area are expected to be substantially below the CMP's

minimum 50-trip threshold. Further, the Plan B Project's net PCE-adjusted trip additions through the CMP intersections nearest the project site will be well below the levels at which significant impacts would be anticipated, and no further analyses are warranted.

CMP Freeway Segment Impacts

An examination was also made of the potential for Plan B Project-related freeway impacts withinthe project study area. As shown previously in Table 37 (Plan B Project Trip Generation Estimates), the proposed Plan B Project is expected to generate fewer than 150 total net trips during both the AM and PM peak hours, with maximum directional traffic of 65 PCE-adjusted outbound trips during the PM peak hour (Plan B results in reductions in both inbound and outbound trips during the AM peak hour), with only a fraction of these trips expected to utilize any of the area freeways, and as such, the proposed Plan B Project will not approach the minimum CMP directional freeway trip thresholds on any of the freeway segments in the project vicinity. Therefore, no significant Plan B Project-related freeway mainline impacts are expected, and no further analysis is required.

Revised Site Plan A CMP Impacts

Less-Than-Significant Impact. Revised Site Plan A was evaluated in accordance with the same CMP project TIA guidelines as the Site Plan A and B projects, which require detailed analyses of all CMP arterial monitoring intersections where a project could add a total of 50 or more trips (sum of all intersection approaches) during either peak hour, as well as for all freeway segments where a project could add 150 or more trips in either direction during the peak hours.

CMP Arterial Monitoring Intersection Impacts

The Revised Site Plan A project is expected to result in a total net reduction in site-related trips of three PCE-adjusted trips (increase of five net inbound, reduction of eight net outbound), and as such, would not meet the CMP's minimum 50-trip threshold at any of the four CMP arterial monitoring intersections in the study area during the AM peak hour. Therefore, no detailed impact analysis of these locations is warranted for this time period. During the PM peak hour, the Revised Site Plan A project is expected to result in a total of approximately 93 net new PCE-adjusted trips, exceeding the CMP's 50-trip threshold, and as a result, the potential for project-related impacts to each of the four CMP intersections was evaluated during this time period.

A review of the project's anticipated traffic travel patterns and net traffic volumes into, out of, and through the study area indicates that project traffic is expected to disperse throughout the area roadway network outside the immediate study vicinity, and that incremental net project-related traffic additions to any of the CMP monitoring intersections identified previously are expected to be substantially less than the CMP's 50-trip threshold. Specifically, a total of only about 15 net new PCE project-related trips (both directions) are expected to travel beyond the study area from the study intersection of Rosecrans Avenue and Wilmington Avenue and which could potentially affect the CMP arterial monitoring locations at both Alameda Street and Compton Boulevard, and Alameda Street and the SR-91 Freeway ramps during the PM peak hour (based on the east/west project traffic on Rosecrans Avenue; north/south project traffic at Rosecrans Avenue and Wilmington Avenue travels to and from the SR-91 Freeway via Wilmington Avenue, and is not expected to affect either the Alameda Street and Compton Boulevard, or Alameda Street and the SR-91 Freeway ramps CMP arterial monitoring intersections).

Similarly, a total of only about five net PCE-adjusted project-related trips are expected to travel outside the study area during the PM peak hour west of the I-110 Freeway (from the study intersection of Rosecrans Avenue and the I-110 SB On/Off-Ramps), and which could potentially

affect the CMP arterial monitoring intersection at Artesia Boulevard and Vermont Avenue. Finally, no measurable project-related traffic is expected to travel to or from the northeast of the study area through the remaining CMP intersection at Alameda Avenue and Imperial Highway during the PM peak hour, although it is possible that some of the east-west oriented project trips noted earlier at Rosecrans Avenue and Wilmington Avenue could access this CMP location.

It should be noted that these project traffic estimates are considered to be highly conservative, since all project-related traffic traveling into or out of the study area in the vicinity of each of the CMP arterial monitoring locations was assumed to travel through these intersections, although it is likely that project traffic will disperse along other roadways outside the study area, reducing the amount of potential project traffic actually reaching the CMP arterial monitoring locations. However, even using these conservative values, the potential net project-related traffic additions to any of the four CMP intersections in the general study area are expected to be substantially below the CMP's minimum 50-trip threshold for requiring a detailed analysis. Further, even these conservative trip estimates are not expected to result in significant impacts at any of the CMP monitoring locations; the net volumes are simply too small to produce measurable effects. Therefore, based on these evaluations, the net PCE-adjusted project-related trip additions through the CMP intersections nearest the project site will be well below the levels at which a significant impact would be created or anticipated, and no further analyses are warranted.

CMP Freeway Segment Impacts

An examination was also made of the potential for project-related freeway impacts within the project study area. The CMP requires that detailed freeway impact analyses be prepared whenever a project could be anticipated to add 150 or more peak hour trips in any direction to the area freeway system. The Revised Site Plan A project is expected to generate fewer than 150 total net trips during both the AM and PM peak hours, with maximum PCE-adjusted net directional traffic of 20 inbound trips and 73 outbound trips during the PM peak hour, both of which are well below the CMP's 150-trip threshold even if all of this project traffic were assigned to the area freeways. Additionally, only about one-quarter to one-third of the project's total trips are expected to utilize any of the area freeways, further reducing the potential project-related traffic additions to any of the freeways in the project vicinity. As such, no significant freeway mainline impacts are expected, and no further analysis is required.

Revised Site Plan B CMP Impacts

Less-Than-Significant Impact. Revised Site Plan B was evaluated in accordance with the same CMP project TIA guidelines as the Site Plan A and B projects, which require detailed analyses of all CMP arterial monitoring intersections where a project could add a total of 50 or more trips (sum of all intersection approaches) during either peak hour, as well as for all freeway segments where a project could add 150 or more trips in either direction during the peak hours.

CMP Arterial Monitoring Intersection Impacts

The proposed Revised Site Plan B project would result in an anticipated net reduction of approximately three PCE-adjusted trips (increase of five inbound, reduction of eight outbound). Therefore, as with the Revised Site Plan A project, the Revised Site Plan B project would not meet the CMP's minimum 50-trip threshold at any of the CMP arterial monitoring intersections during this time period, even if all of the anticipated project-related traffic were to travel through each of these intersections. However, during the PM peak hour, the Revised Site Plan Plan B project is expected to generate a total of approximately 93 net PCE-adjusted trips, and as such, while unlikely, it is possible that 50 or more of these project-related trips could travel through one or more of the CMP

arterial monitoring locations. As a result, the Revised Site Plan B project-related impacts to each of the CMP intersections were evaluated during this time period.

A review of the Plan B project's anticipated traffic travel patterns and net traffic volumes indicates that project traffic will disperse throughout the area roadway network outside the immediate study vicinity, and that incremental net project-related traffic additions to any of the four subject CMP monitoring intersections are expected to be substantially below the CMP's 50-trip threshold. Only about 15 net new PCE project-related trips (both directions) are expected to travel beyond the study area from the study intersection of Rosecrans Avenue and Wilmington Avenue and which could potentially affect the CMP arterial monitoring locations at Alameda Street and Compton Boulevard, and Alameda Street and the SR-91 Freeway ramps during the PM peak hour (based on east/west project traffic using Rosecrans Avenue). Similarly, a total of only about five net PCE-adjusted project-related trips are expected to travel beyond the study area during the PM peak hour west of the I-110 Freeway (from the study intersection of Rosecrans Avenue and the I-110 SB On/Off-Ramps), and which could potentially affect the CMP arterial monitoring intersection at Artesia Boulevard and Vermont Avenue. Finally, no measurable project-related traffic is expected to travel to or from the northeast of the study area through the remaining CMP intersection at Alameda Avenue and Imperial Highway during PM peak hour, although it is possible that some of the east-west oriented project trips noted earlier at Rosecrans Avenue and Wilmington Avenue could access this CMP location. Therefore, as with the Revised Site Plan A project, the Revised Site Plan B potential net project-related traffic additions to any of the four CMP intersections in the general study area are expected to be substantially below the CMP's minimum 50-trip threshold. Further, the Revised Site Plan B project's net PCE-adjusted trip additions through the CMP intersections nearest the project site will be well below the levels at which significant impacts would be anticipated, and no further analyses are warranted.

CMP Freeway Segment Impacts

An examination was also made of the potential for Revised Site Plan B project-related freeway impacts within the project study area. The CMP requires that detailed freeway impact analyses be prepared whenever a project could be anticipated to add 150 or more peak hour trips in any direction to the area freeway system. The Revised Site Plan B project is expected to generate fewer than 150 total net trips during both the AM and PM peak hours, with maximum net directional traffic of 20 PCE-adjusted inbound and 73 PCE-adjusted outbound trips during the PM peak hour (the net Revised Site Plan B project trips are substantially lower during the AM peak hour, including a net reduction in outbound trips during that time period), with only a fraction of these trips expected to utilize any of the area freeways. As such, the Revised Site Plan B project will not approach the minimum CMP directional freeway trip thresholds on any of the freeway segments in the project vicinity. Therefore, no significant Revised Site Plan B project-related freeway mainline impacts are expected, and no further analysis is required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it were an aviation-related use. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. The maximum building height of the proposed Project would be 53 feet, which would not be tall enough to interfere with air traffic patterns. As such, due to the nature and scope of the Project, development of the Project would not have the potential to result in a change in air traffic patterns at Compton Airport or any other airport in the area. No impact would occur and no mitigation measures are required.

Revised Site Plan A

No Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

Revised Site Plan B

No Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. The Project site does not contain any aviation-related uses, and the Project does not include development of any aviation-related uses. No impacts would occur and no mitigation measures are required.

d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Less-Than-Significant. The Project design does not include any sharp curves, dangerous intersections, or incompatible uses. Vehicular access to the Project site would be provided via entrances on McKinley Avenue, Central Avenue, and Rosecrans Avenue. Two new traffic signals would be provided by the Project at Central Avenue/139th Street and McKinley/Rosecrans that would improve access, circulation, and traffic safety. Although the project's McKinley Avenue "truck-only" driveway will not be signalized, due to the proposed right-turn entry/left-turn exit restrictions and relatively light traffic volumes on McKinley Avenue, no substantial congestion at this driveway is anticipated. Although unlikely, given the nature of the trucking activities expected to be associated with the Project (i.e., primarily local deliveries from the Port of Los Angeles and other local distribution points), it is possible that some truckers may park on residential streets for some period of time before or after deliveries, However, trucks will be provided with sufficient "waiting" areas within the site so that they do not have to park on neighborhood streets if they need to wait for a loading dock door to become available. Similarly, sufficient automobile parking is provided to accommodate the anticipated employment levels, even during shift change periods. In addition, as an operational feature of the Project, information will be provided to truckers that reinforces that no truck parking is provided outside the Project site and in the surrounding area. Therefore, impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan A project. The Project design does not include any sharp curves, dangerous intersections, or incompatible uses. Similar to the Site Plan A project, vehicular access to the Revised Site Plan A Project site would be provided via new entrances on McKinley Avenue, Central Avenue, and Rosecrans Avenue which would be designed to ensure adequate entry and exit circulation and on-site truck movements. Two new traffic signals would be provided by the Project at Central Avenue/139th Street and McKinley/Rosecrans that would improve access, circulation, and traffic safety. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan B project. The Project design does not include any sharp curves, dangerous intersections, or

incompatible uses. Similar to the Site Plan B project, vehicular access to the Project site would be provided via new entrances on McKinley Avenue, Central Avenue, and Rosecrans Avenue which would be designed to ensure adequate entry and exit circulation and on-site truck movements. Two new traffic signals would be provided by the Project at Central Avenue/139th Street and McKinley/Rosecrans that would improve access, circulation, and traffic safety. Impacts would be less than significant and no mitigation measures are required.

e) Result in inadequate emergency access?

Less-Than-Significant Impact. The Project is required to comply with all applicable Fire Department and Public Works Department regulations pertaining to emergency access and evacuation. As discussed in the response to Question 16(a) above, access to the Project site for Site Plans A and B would be provided via entrances on McKinley Avenue, Central Avenue, and Rosecrans Avenue. Site Plan B would provide two additional entrances on Sam Littleton Street. Therefore, impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan A project. The Project is required to comply with all applicable Fire Department and Public Works Department regulations pertaining to emergency access and evacuation. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan B project. The Project is required to comply with all applicable Fire Department and Public Works Department regulations pertaining to emergency access and evacuation. Impacts would be less than significant and no mitigation measures are required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less-Than-Significant With Mitigation Incorporated. Public transit within the study area consists primarily of local-serving bus lines providing multiple stops and convenient localized access to shopping, business, and recreation destinations, although some regional transit opportunities are also present. This bus service is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"), although the City of Gardena and City of Compton also run buses within the project vicinity. However, while the area in general is served by a number of bus lines and other public transit facilities, only four bus lines, Metro Lines 53 and 125, and Compton (Renaissance) Routes 1 and 5, currently provide stops at or within convenient walking distance (generally one-quarter mile) of the project site. While other bus lines operated by Metro, Compton, and other providers do not provide stops located close enough to the Project site to be used directly, they can generally be accessed via connections or transfers from the site-serving lines to provide access between the project site and the larger regional area. A map of the current bus service in the project vicinity is shown in Figure 13 of the Traffic Study (Appendix K to this Initial Study), and the lines serving the Project site are described in the following pages.

Metro Line 53 –This line provides weekday, weekend, and holiday local-stop service between downtown Los Angeles and California State University Dominguez Hills in the City of Carson,

traveling primarily along Central Avenue throughout its route, including past the project site, providing site-serving stops in both directions at both Rosecrans Avenue and 139th Street, and for northbound travel only at Piru Street, and for southbound travel only at Sam Littleton Street. Line 53 also provides stops at the 7th Street/Metro Transit Center in downtown Los Angeles (connecting to the Metro Red and Purple Lines), and at the Metro Avalon Green Line Station near Avalon Boulevard and the Glenn Anderson Freeway about one and one-quarter miles northwest of the project site. Line 53 operates between approximately 4:00 AM and 1:00 AM every day, including weekends and holidays, with typical headways through the study area of approximately 20 to 30 minutes in each direction on weekdays and Saturdays, while Sunday and holiday headways increase to between 30 and 45 minutes in both directions.

Metro Line 125 – This local-stop line provides weekday, weekend, and holiday service between the Plaza El Segundo shopping center, in the City of El Segundo near Sepulveda Boulevard and Rosecrans Avenue on the west and the Metro Norwalk Green Line Station just northeast of the Glenn Anderson (I-105) Freeway/San Gabriel River (I-605) Freeway interchange, travelling primarily along Rosecrans Avenue along its route, including stops for both directions of travel at Central Avenue, at Aprilia Avenue near the project's proposed "flag lot" driveway and access to Rosecrans Avenue, and at Stanford Avenue, just west of McKinley Avenue. Line 125 also provides stops at the Martin Luther King Jr. Transit Center and the Compton Blue Line Station (both near Willowbrook Avenue and Compton Boulevard) and the Rosecrans Transitway Station (at Rosecrans Avenue and the Harbor Freeway) and along its route. Line 125 operates from approximately 4:30 AM to 9:30 PM on weekdays, with typical headways of 15 to 30 minutes in each direction. Saturday service is available between approximately 5:00 AM and 9:30 PM, with headways of about 30 minutes in each direction throughout the day, while Sunday and holiday service for Line 125 is provided between approximately 6:00 AM and 9:00 PM, with typical headways of between 30 to 60 minutes in both directions throughout the day.

Compton Route 1 – This local-serving "shuttle" route is operated by Renaissance Transit for the City of Compton, providing weekday and Saturday service through the City and adjacent areas. Route 1 begins at the Martin Luther King Jr. Transit Center near Willowbrook Avenue and Compton Boulevard, running a clockwise route along Rosecrans Avenue, Wilmington Avenue, Compton Boulevard, Goleta Street, 149th Street, Central Avenue, El Segundo Boulevard, and Wilmington Avenue before returning to the Transit Center along eastbound Rosecrans Avenue. Route 1 provides several convenient stops along Central Avenue at or near the project site, including at Rosecrans Avenue, 139th Street, and Piru Street. Route 1 runs approximately every 30 minutes between its operating hours of approximately 7:30 AM to 3:30 PM.

Compton Route 5 – This line also provides weekday and Saturday local-serving "shuttle" service beginning at the Martin Luther King Jr. Transit Center and travelling in a clockwise direction Compton Boulevard, Long Beach Boulevard, Artesia Boulevard, Walnut Street, Central Avenue (including a project site-serving stop at Rosecrans Avenue), and El Segundo Boulevard, before returning to the Transit Center along Willowbrook Avenue. Route 5 also provides service to the Metro Artesia Blue Line Station near Acacia Avenue and Walnut Street. Route 5 is in service from approximately 7:30 AM to 3:30 PM, with headways of 30 minutes throughout this period.

Transit Impacts

Plan A

As indicated in the earlier discussion of trip generation, no significant use of public transportation by the Plan A Project employees or visitors beyond that already intrinsically included in the ITE trip generation rates was assumed. However, for purposes of assessing the potential project-related

impacts on the area public transit system, it was assumed that up to approximately 10 percent of the total passenger vehicle trips generated by the Plan A Project could instead utilize the available existing public transportation (bus) service in the project vicinity as a regular mode of travel.

Using this approach, the number of project trips that might travel to and from the project site via the existing area public transit service was calculated. Based on the proposed Plan A Project trip generation calculations shown previously in Table 23, it was estimated that approximately 183 of the project's net daily automobile trips, including 11 trips (9 inbound, 2 outbound) during the AM peak hour, and 12 trips (three inbound, nine outbound) during the PM peak hour, could potentially travel to and from the project site via the area's public transit facilities rather than traveling in privately-owned vehicles. Further assuming an average vehicle occupancy ("AVO") of 1.2 persons per vehicle (which is typical of the Southern California region) in order to convert the vehicle trips noted above to "person trips", and assuming that the existing site uses exhibit similar public transit utilizations, the proposed Plan A Project could result in a potential net incremental increase in area transit ridership of approximately 220 persons per day, including 13 persons (11 inbound to the project site, 2 outbound from the project site) during the AM peak hour, and 14 persons (four inbound, 10 outbound) during the PM peak hour, assuming that all project-related transit usage would occur as a result of new bus ridership.

While it is acknowledged that bus utilization in the project vicinity can be heavy during the peak weekday commute periods, this nominal level of new rider demand would likely be divided among the four bus lines providing direct service to the project site, which each currently exhibit headways at the Project Site of generally between 20 and 30 minutes in both directions of travel past the site, resulting in a total of approximately 10 to 15 bus stops per hour during the AM and PM peak hours, and a total of approximately 180 bus stops throughout the day at or near the project site. As a result, the potential project-related increases in ridership on any single bus are expected to be nominal (approximately one to two net new riders per bus, on average). Based on these assumptions, the proposed Plan A Project is not anticipated to result in significant transit-related impacts to any of the existing public transit (bus) facilities serving the project site or larger study area, and no mitigation measures in this regard are warranted.

The location of the project's proposed new access driveway on Rosecrans Avenue (near Building A-2) will, however, conflict with the existing bus stop (Metro Line 125) along the north side of the street just to the east of Aprilia Avenue. Thus, the Project would involve the relocation of the existing bus stop. However, a review of the conditions and other driveway or intersection locations along Rosecrans Avenue in the immediate area indicates that the bus stop could be moved to one of several alternative locations without resulting in additional or excessive walking distances for riders using this stop. The intersection of Rosecrans Avenue and Aprilia Avenue, as well as a driveway serving the existing commercial building at 2501 Rosecrans Avenue, will prevent the relocation of the bus stop immediately to the west of its current location, although it can be relocated to the west of the 2501 Rosecrans Avenue site driveway, approximately 250 feet from its current location, and a little over 200 feet from the existing crosswalk at Aprilia Avenue (compared to approximately 20 feet at its current location). Alternately, the bus stop could be relocated approximately 200 feet to the east of its current location, to a location between the existing easternmost driveway for the laundry/cleaners business immediately adjacent to the Project's Rosecrans Avenue access road, and the westernmost driveway for the existing Rosecrans Crossing shopping center development at 2251 Rosecrans Avenue.

Whether the existing bus stop is relocated to the east or west of its current location, the potential additional distances that existing bus riders would be required to walk will be relatively nominal (between 200 to 250 feet), and are not expected to significantly impact transit accessibility. However, to assure that no significant impacts result from the relocation of the existing bus stop,

Mitigation Measure TR-7 requires the Project Applicant to work with the City of Compton, County of Los Angeles Public Works Department, and Metro to identify an appropriate new location and design for the stop. Further, the relocation of the bus stop will be the responsibility of the Project Applicant, including all design, construction, and installation costs.

Plan B

In order to assess the potential Plan B Project-related impacts on the study area public transit system, it was assumed that up to approximately 10 percent of the passenger vehicle trips generated by the Plan B Project could instead utilize the available public transportation (bus) service in the project vicinity as a regular mode of travel. As such, based on the Plan B Project trip generation calculations shown previously in Table 36, it was estimated that approximately 127 of the Plan B Project's net daily passenger vehicle trips, including seven trips (6 inbound, 1 outbound) during the AM peak hour, and eight trips (two inbound, six outbound) during the PM peak hour, could potentially travel to and from the project site via the area's public transit facilities rather than traveling in privately-owned vehicles. Further assuming an typical AVO of 1.2 persons per vehicle in order to convert the vehicle trips noted above to "person trips", and that the existing site uses exhibit similar public transit utilizations, the Plan B Project could result in a potential net increase in area transit ridership of approximately 152 persons per day, including 8 persons (7 inbound, 1 outbound) during the AM peak hour, and nine persons (two inbound, seven outbound) during the PM peak hour.

This nominal level of new rider demand would likely be divided among the four bus lines providing direct service to the project site, each of which currently exhibit headways at the project site of generally between 20 and 30 minutes in both directions of travel past the site, providing a total of about 10 to 15 bus stops per hour during the AM and PM peak hours, and a total of approximately 180 bus stops throughout the day at or near the project site. As a result, the potential project-related increases in ridership on any single bus are expected to be nominal (approximately one to two net new riders per bus, on average). Therefore, based on the assumptions described above, the proposed Plan B Project is not anticipated to result in significant transit-related impacts to any of the existing public transit (bus) facilities serving the project site or larger study area, and no mitigation measures in this regard are warranted.

Finally, as with the Plan A Project, the Plan B Project will require that the existing bus stop along the north side of the street just to the east of Aprilia Avenue be relocated. However, as described in detail earlier in the discussion of this issue for the Plan A Project, there are several alternative locations where this bus stop could be moved without resulting in additional or excessive walking distances for current riders. As a result, the relocation of the existing bus stop is not expected to result in significant impacts to transit accessibility. However, to assure that no significant impacts result from the relocation of the existing bus stop, as required by Mitigation Measure TR-7, the project applicant shall work with the City of Compton, Los Angeles County Department of Public Works, and Metro to identify an appropriate new location for the stop. The project applicant will be responsible for all design, construction, and installation costs associated with the relocation of this bus stop.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan A project. In evaluating the potential for project-related impacts on the area public transit system, it was assumed that up to approximately 10 percent of the total number of passenger vehicle trips generated by the Revised Site Plan A project could instead

utilize the available existing public transportation (bus) service in the project vicinity as a regular mode of travel.

Based on the Revised Site Plan A project trip generation calculations, approximately 137 of the project's total net daily automobile trips, including eight trips (seven inbound, one outbound) during the AM peak hour, and eight trips (two inbound, six outbound) during the PM peak hour, could potentially travel to and from the project site via the area's public transit facilities rather than traveling in privately-owned vehicles. Assuming an average vehicle occupancy ("AVO") of 1.2 persons per vehicle (which is typical of the Southern California region) in order to convert the vehicle trips noted above to "person trips", and assuming that the existing site uses exhibit similar public transit utilizations, the Revised Site Plan A project could result in a potential net incremental increase in area transit ridership of approximately 164 persons per day, including about 10 persons during each of the peak hours (eight inbound to the project site, two outbound from the project site during the AM peak hour, and three inbound, seven outbound during the PM peak hour), assuming that all project-related transit usage is due to new bus ridership.

This nominal level of new rider demand would likely be divided among the four bus lines providing direct service to the project site, which currently exhibit headways at the project site of generally between 20 and 30 minutes in both directions of travel past the site, resulting in a total of approximately 10 to 15 bus stops per hour during the AM and PM peak hours, and a total of approximately 180 bus stops throughout the day at or near the project site. As a result, the potential project-related increases in ridership on any single bus are expected to be nominal (average of approximately one to two net new riders per bus). Therefore, based on the assumptions described above, the Revised Site Plan A project is not anticipated to result in significant transit-related impacts to any of the existing public transit (bus) facilities serving the project site or larger study area, and no mitigation measures in this regard are warranted.

The Revised Site Plan A project would have the same conflict with the existing bus stop (Metro Line 125) along the north side of the street just to the east of Aprilia Avenue as the Site Plan A project. Mitigation Measure TR-7 would be applicable to the Revised Site Plan A project and would reduce this impact to less than significant.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B and would have similar operational characteristics as the Site Plan B project. In evaluating the potential for project-related impacts on the area public transit system, it was assumed that up to approximately 10 percent of the passenger vehicle trips generated by the Revised Site Plan B project could instead utilize the available public transportation (bus) service in the project vicinity as a regular mode of travel. Based on the Revised Site Plan B project trip generation calculations, approximately 137 of the net Revised Site Plan B project daily passenger vehicle trips, including eight trips (seven inbound, one outbound) during the AM peak hour, and eight trips (two inbound, six outbound) during the PM peak hour, could potentially travel to and from the project site via the area's public transit facilities rather than traveling in privately-owned vehicles. Further assuming an typical AVO of 1.2 persons per vehicle in order to convert the vehicle trips to "person trips", and that the existing site uses exhibit similar public transit utilizations, the Revised Site Plan B project could result in a potential net increase in area transit ridership of approximately 164 persons per day, including approximately 10 persons (eight inbound, two outbound) during the AM peak hour, and approximately 10 persons (three inbound, seven outbound) during the PM peak hour.

This nominal level of new rider demand would likely be divided among the four bus lines providing direct service to the project site, each of which currently exhibit headways at the project site of generally between 20 and 30 minutes in both directions of travel past the site, providing a total of about 10 to 15 bus stops per hour during the AM and PM peak hours, and a total of approximately 180 bus stops throughout the day at or near the project site. As a result, the potential project-related increases in ridership on any single bus are expected to be nominal (approximately one to two net new riders per bus, on average). Therefore, based on the assumptions described above, the Revised Site Plan B project is not anticipated to result in significant transit-related impacts to any of the existing public transit (bus) facilities serving the project site or larger study area, and no mitigation measures in this regard are warranted.

The Revised Site Plan B project would have the same conflict with the existing bus stop (Metro Line 125) along the north side of the street just to the east of Aprilia Avenue as the Site Plan B project. Mitigation Measure TR-7 would be applicable to the Revised Site Plan B project and would reduce this impact to less than significant.

Bicycle Facilities

Plan A

The City of Compton's Zoning Code requires that bicycle parking also be provided by the Project, at a ratio of one bicycle space for every 20-vehicle parking spaces for most commercial developments, including industrial and warehousing uses. Based on the recommended vehicular parking supply of 614 spaces, the Plan A Project will be required to provide a total of approximately 31 bicycle spaces. If the bicycle parking requirement were to be applied against the City's typical warehousing vehicle parking requirement (1 space/850 square feet, resulting in a total of 1,765 required vehicle parking spaces, as described previously), the Plan A Project's potential bicycle parking requirement would increase to approximately 88 spaces. However, this amount of bicycle parking is likely excessive for the type of facility involved, for which bicycle commuting is not expected to be a significant factor, and therefore, bicycle parking for the Project would be based on the estimated 614-space vehicular parking needs (for the Plan A Project), resulting in a requirement of approximately 31 bicycle spaces. The proposed Plan A development scheme would provide a total of 34 bicycle spaces, including 29 bicycle spaces located adjacent to the main parking lot south of Building A-1, and five bicycle spaces located adjacent to Building A-2. Therefore, the Plan A Project will provide sufficient bicycle parking to meet its anticipated parking needs and assumed requirements. Impacts would be less than significant.

Plan B

Based on the anticipated Plan B Project vehicular parking demand of 441 spaces noted earlier, and the City of Compton's bicycle parking ratio of one bicycle space for every 20 vehicle space, the Plan B Project would require a total of approximately 22 bicycle spaces. The Plan B Project will provide a total of approximately 33 bicycle spaces, including 14 bicycle spaces located proximate to the automobile parking lots for both Buildings B-1 and B-2, and five bicycle spaces located adjacent to Building B-3. Therefore, as with the Plan A development scheme, the Plan B Project will provide sufficient bicycle parking to meet both its assumed requirements and anticipated demands and impacts would be less than significant.

Revised Site Plan A

Less-Than-Significant Impact. The City's Zoning Code requires that bicycle parking also be provided by the Revised Site Plan A project, at a ratio of one bicycle space for every 20 vehicle

parking spaces for most commercial developments, including industrial and warehousing uses. Based on the recommended vehicular parking supply of 472 spaces, the Revised Site Plan A project will be required to provide a total of approximately 24 bicycle spaces. Based on the estimated 472-space vehicular parking needs for the Revised Site Plan A project, a requirement of approximately 24 bicycle spaces would result. The Revised Site Plan A development scheme will provide a total of 30 bicycle spaces, all of which are located adjacent to the main parking lot to the south of Building A-1. Therefore, the Revised Site Plan A project would provide approximately six bicycle parking spaces in excess of its assumed requirements. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. The City's Zoning Code requires that bicycle parking also be provided by the Revised Site Plan B project, at a ratio of one bicycle space for every 20 vehicle parking spaces for most commercial developments, including industrial and warehousing uses. Based on the anticipated Revised Site Plan B project vehicular parking demand of 472 spaces noted earlier, and the City of Compton's bicycle parking ratio of one bicycle space for every 20 vehicle space, the Revised Site Plan B project would require a total of approximately 24 bicycle spaces, including 12 spaces each for both Building B-1 and Building B-2. The Revised Site Plan B project will provide a total of approximately 30 bicycle spaces, including 14 spaces for Building B-1 and 16 spaces for Building B-2 (located near the northeast corner of each building). Therefore, the Revised Site Plan B project will provide sufficient bicycle parking to meet both its assumed requirements and anticipated demands. Impacts would be less than significant and no mitigation measures are required.

MM-TR-7. *The Project Applicant shall work with the City of Compton, Los Angeles County Department of Public Works, and Metro to identify an appropriate new location and design for the relocated bus stop on Rosecrans Avenue. Relocation of the bus stop shall be the responsibility of the Project Applicant, including all design, construction, and installation costs.*

17. UTILITIES AND SERVICE SYSTEMS

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less-Than-Significant Impact. Wastewater generated by the Project during construction would be similar to that generated by other projects of similar size and scale, for which no pre-treatment is required. Wastewater is treated by standard (primary, secondary, and tertiary) treatment processes. Any industrial wastewater discharged by the Project must comply with NPDES requirements, as previously discussed in the response to Question 9(a). Improvements associated with the Project would comply with all applicable wastewater treatment requirements of the LARWCQB. Therefore, impacts would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Improvements associated with the Project would comply with all applicable wastewater treatment requirements of the LARWCQB. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Improvements associated with the Project would comply with all applicable wastewater treatment requirements of the LARWCQB. Impacts would be less than significant and no mitigation measures are required.

b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Water

Less-Than-Significant Impact. CEQA Guidelines § 15083.5 requires a Lead Agency to identify water systems to provide water supplies for projects over specified thresholds. Government Code §§ 66437.7, *et seq*. ("SB 221") outlines requirements for projects consisting of residential subdivisions. The Project does not include a residential subdivision and, thus, is not subject to SB 221. Water Code §§ 10910, *et* seq. ("SB 610") requires water supply assessments to evaluate whether water supplies will meet projected water demand for certain projects. Projects subject to requirements under SB 610 include the following: (a) a residential development of more than 500 dwelling units; (b) a shopping center or business employing more than 1,000 persons or having more than 500,000 square feet of floor space; (c) a commercial office building employing more than 1,000 persons or having more than 250,000 square feet; (d) a hotel or motel with more than 500 rooms; (e) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 square feet or 40 acres; (f) a mixed-use project containing any of the foregoing; or (g) any other project that would have a water demand at least equal to a 500 dwelling unit project. The Project would be subject to SB 610 as it exceeds the threshold for industrial facilities greater than 650,000 square feet. Accordingly, a Water Supply Assessment (WSA) was prepared for the Project and is contained in Appendix L to this IS/MND.

The City of Compton Municipal Water District (CMWD) is the anticipated water purveyor for the Project. CMWD provides water service for approximately 80% of the City of Compton. The City's water supply is provided by a combination of wells and deliveries from Metropolitan Water District of Southern California (MWD). The City's 2010 Urban Water Management Plan (UWMP) states,

"[CMWD] has two major sources of water. It currently has access to 5,780 acre-feet of groundwater that is supplied via 7 wells. Water is pumped from these wells, and flows into a grid system, which is then distributed using a gravity fed system via 163 miles of 2 to 24-inch diameter pipes. In addition, MWD supplies approximately 30-60% of the City's water demand. MWD has three active interconnections to the City. The purchased water from MWD augments the water from the wells, via the distribution system, and flows into four 3 million gallon welded steel-plate storage tanks, for a total of 12 million gallons of storage. Any fluctuations in system pressure or flow deficiencies are taken up by these tanks."

Per the UWMP, the overall City water demand in 2010 was approximately 7,111 acre feet per year. Additional data was gathered directly from the City of Compton, which included actual system demand for the years 2010-2013. According to this data, actual system demand in 2010 was 7,111 AFY, and three years later, in 2013, the demand increased by only 21 AFY, to 7,132 AFY. Comparatively, the City's UWMP projects that the 2015 supply will be 9,484 AFY, a 442 AFY increase over the 2010-2015 period. Therefore, the City has another 421 AFY in its budgeted increase over 2010 to allocate in 2014 and 2015. Water use is then projected out to the year 2030, where it is estimated at 8,327 acre-feet per year, an increase of approximately 1,216 acre-feet.

The Project's anticipated water demand can be estimated by applying a consumption factor to the sewage generation rate for warehouses published by the Sanitation Districts of Los Angeles County. The Sanitation District rate is 25 gallons per day per 1,000 square feet of building area. Assuming a maximum building size of 1.5 million square feet (site Plan A) and a conservative consumption rate of 30%,[63] the Project domestic water demand is approximately 54 acre feet per year. The estimated Project irrigation demand is approximately 22 acre-feet per year. The total Project water demand is approximately 76 acre-feet per year, which is approximately 6.3% of the CMWD's projected demand increase through 2030 and approximately 17.2% of the CMWD's projected demand increase through 2015. Since the Brickyard Site is one of the largest undeveloped properties within the City's water service area, the increase in consumption associated with the Project would be within the projected increases in demand set forth in the UWMP and would not require construction of new or expanded water facilities. Impacts related to water supply would be less than significant. The cumulative effects of the Project in conjunction with other cumulative growth in the City of Compton with respect to water supplies was evaluated in the Water Supply Assessment prepared for the Project, which documents the availability of the City's water supplies to serve the cumulative water demand. The City of Compton's combined potable water system's existing and future water supplies during average/normal, single dry and multiple dry water conditions over a 20-year projection will meet the projected water demand associated with the proposed Project, in accordance with California Water Code section 10910 et seq., and other applicable statutes. The City's variety of water supply sources and conservation measures play a key role in its continued ability to provide its residents and businesses with a reliable water supply.[64]

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. The Revised Site Plan A Project's anticipated water demand would be less than the Site Plan A project demand of approximately 76 acre-feet per year, based on applying a consumption factor to the sewage generation rate for warehouses published by the Sanitation Districts of Los Angeles County. The Sanitation District rate is 25 gallons per day per 1,000 square feet of building area. Assuming a maximum building size of 1.154 million square feet (site Plan A) and the conservative consumption rate of 30%, the Revised Site Plan A Project domestic water demand would be is approximately 42 acre feet per year. The estimated Revised Site Plan A Project irrigation demand is approximately 22 acre-feet per year. The total Revised Site Plan A Project water demand would be approximately 64 acre-feet per year, which is approximately 4.9% of the CMWD's projected demand increase through 2030 and approximately 13.2% of the CMWD's projected demand increase through 2015. Since the WSA for the larger Site Plan A project concludes that the City's water supplies would be sufficient to accommodate the Site Plan A project, water supplies would also be sufficient to accommodate the Revised Site Plan A project. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. The Revised Site Plan B Project's anticipated water demand would the

[63] *Consumption rate of 30% means that water consumption is 130% of wastewater generation.*

[64] *Water Supply Assessment for the Compton Brickyard Project, prepared by Kimley-Horn and Associates, November 5, 2014.*

same as the Revised Site Plan A project since the level of development and landscaping would be the same. Impacts would be less than significant and no mitigation measures are required.

Wastewater

Less-Than-Significant Impact. The sewage generation rate for warehouses published by the Sanitation Districts of Los Angeles County is 25 gallons per day per 1,000 square feet of building area. Assuming a maximum building size of 1.5 million square feet (Site Plan A), the Project's projected wastewater generation would be approximately 37,500 gallons per day. Wastewater treatment in the City is provided by the County Sanitation Districts of Los Angeles County (CSDLAC). Wastewater in the City flows to the CSDLAC Joint Water Pollution Control Plant (JWPCP) in Carson for treatment. The CSDLAC JWPCP, which provides both primary and secondary treatment, treats an average daily flow of 280 million gallons per day (mgd), and has capacity to treat 400 mgd. This equals a remaining capacity of 120 mgd of wastewater able to be treated at the CSDLAC JWPCP, which will have sufficient remaining capacity to treat the increase in wastewater generated by the Project.[65] Therefore, the Project will not require or result in the construction of new or expanded wastewater treatment facilities.

The Project site is not presently connected to the existing sanitary sewer system. Based upon record drawings, an existing 8-inch sewer line is located under McKinley Avenue, to the west of the Project site, that runs to the north, then to the east through a residential area and then ties into another 8-inch line in South Central Avenue. Approximately halfway between this residential area, the 8-inch line then ties into a 10-inch line that heads east through another residential area and then discharges into the interceptor sewer.

Two flow monitoring devices were set up to evaluate the existing flows of the 8-inch and 10-inch sewer lines and to determine if they have capacity to accommodate wastewater flows from the Project. One of the flow monitoring devices (FM #1) was set up at the 8-inch line before it turns into the 10-inch line and the other one (FM #2) was set up at the 10-inch line before it discharges into the sewer interceptor. The device was able to pick up usable data for the 8-inch line, however, the device appears to have encountered a clog at the 10-inch line and the data could not be used. Based upon the flow monitor's data, the 8-inch line is flowing at 72% of its total capacity. For the 10-inch line, the estimated sewer flow for the residential area upstream of FM #1 to the data found for the 8-inch line was used to determine the flow at the 10-inch line. Based on this data, it was determined that the 10-inch line is flowing at 58% of capacity.

The Project is proposing to tie into the 8-inch sewer line, upstream of FM #1 on Central Avenue. Based upon the estimated loads for the Project use, which were determined to be 37,500 gallons per day, based on a maximum 1.5 million square feet of industrial development at 25 gallons/1,000 square feet/day, the 8-inch sewer line will be flowing at 87% of its capacity. After the 8-inch sewer line ties into the 10-inch line, it will be flowing at 66% of its capacity with the addition of the Project site.

Based upon the flow monitoring data, flows from the Project would cause a portion of the existing lines to exceed capacity. Accordingly, the lines may not have sufficient capacity to accommodate the Project in accordance with City standards and the Project will upsize the point of connection from 134th Street to the existing 10-inch line in order to provide capacity for the Project's loads.

[65] *Sanitation Districts of Los Angeles County, Joint Water Pollution Control Plant, website: http://www.lacsd.org/wastewater/wwfacilities/jwpcp/default.asp, accessed June 25, 2014.*

With this Project Design Feature, the impacts of the Project related to sewer capacity would be less than significant and no mitigation measures are required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Assuming a maximum building size of 1.154 million square feet (Revised Site Plan A), the Project's projected wastewater generation would be approximately 28,800 gallons per day, less than the Site Plan A project generation of approximately 37,500 gallons per day. With the same Project Design Feature of upgrading existing sewer lines as would be included in the Site Plan A project, the impacts of the Project related to sewer capacity would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Assuming a maximum building size of 1.154 million square feet (Revised Site Plan B), the Project's projected wastewater generation would be approximately 28,800 gallons per day, less than the Site Plan A project generation of approximately 37,500 gallons per day. With the same Project Design Feature of upgrading existing sewer lines as would be included in the Site Plan A project, the impacts of the Project related to sewer capacity would be less than significant and no mitigation measures are required.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less-Than-Significant Impact. Stormwater facilities that serve the Project site are provided by the Los Angeles County Department of Public Works. The peak discharge rate allowable from the Project site has been determined by the County and project runoff will be limited to the County's allowable discharge rate (see Question 9(c) above). Therefore, the Project would not require or result in the construction of new or expanded storm water drainage facilities, aside from the Project's individual connection to the existing County system, which would be located at the intersection of Sam Littleton Street and Central Avenue. Impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan A

Less-Than-Significant Impact. Revised Site Plan A would be located on the same Project site as Site Plan A and Site Plan B. While the Revised Site Plan A Project will increase off-site storm water flows over that generated by existing conditions, the flows will be limited to the allowable discharge rate as defined by LACFD. Control of flows to the storm drain system consistent with the allowable discharge rate will be provided by on-site retention/detention facilities. The Revised Site Plan A Project would not require or result in the construction of new or expanded storm water drainage facilities, aside from the Project's individual connection to the existing County system, which would be located at the intersection of Sam Littleton Street and Central Avenue. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Revised Site Plan B would be located on the same Project site as Site Plan A and Site Plan B. While the Revised Site Plan B Project will increase off-site storm water flows over that generated by existing conditions, the flows will be limited to the allowable

discharge rate as defined by LACFD. Control of flows to the storm drain system consistent with the allowable discharge rate will be provided by on-site retention/detention facilities. The Revised Site Plan B Project would not require or result in the construction of new or expanded storm water drainage facilities, aside from the Project's individual connection to the existing County system, which would be located at the intersection of Sam Littleton Street and Central Avenue. Impacts would be less than significant and no mitigation measures are required.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less-Than-Significant Impact. As discussed in the response to Question 17(b), the projected water demand of the Project would be within the supplies expected to be available to the City of Compton Water Division, based on the most recent Urban Water Management Plan and the WSA prepared for the Project (discussed above). In addition, the Project would be required to comply with the City's water conservation policies, further reducing the Project's water demand. Therefore, the Project would not require new or expanded entitlements. Project impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. As discussed in the response to Question 17(b), the projected water demand of the Revised Site Plan A Project would be within the supplies expected to be available to the City of Compton Water Division. The Revised Site Plan A Project would not require new or expanded entitlements. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. As discussed in the response to Question 17(b), the projected water demand of the Revised Site Plan B Project would be within the supplies expected to be available to the City of Compton Water Division. The Revised Site Plan B Project would not require new or expanded entitlements. Impacts would be less than significant and no mitigation measures are required.

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

Less-Than-Significant Impact. As discussed in the response to Question 17(b) above, wastewater generated by the Project would be conveyed to the CSDLAC JWPCP. The Project is anticipated to generate a net increase of approximately 37,500 gpd of wastewater. This increase represents approximately 0.03 percent of the 120 MGD remaining capacity at the CSDLAC JWPCP. Therefore, the CSDLAC JWPCP has adequate remaining capacity to serve the Project. Impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Wastewater generated by the Revised Site Plan A Project would be conveyed to the CSDLAC JWPCP. The Revised Site Plan A Project is anticipated to generate a net

increase of approximately 28,800 gpd of wastewater. This increase represents approximately 0.02 percent of the 120 MGD remaining capacity at the CSDLAC JWPCP. Therefore, the CSDLAC JWPCP has adequate remaining capacity to serve the Revised Site Plan A Project. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Wastewater generated by the Revised Site Plan B Project would be conveyed to the CSDLAC JWPCP. The Revised Site Plan B Project is anticipated to generate a net increase of approximately 28,800 gpd of wastewater. This increase represents approximately 0.02 percent of the 120 MGD remaining capacity at the CSDLAC JWPCP. Therefore, the CSDLAC JWPCP has adequate remaining capacity to serve the Revised Site Plan B Project. Impacts would be less than significant and no mitigation measures are required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less-Than-Significant With Mitigation Incorporated. The Project could result in an increase in solid waste generation. Solid waste generated in the City of Compton is disposed of at ~~one of two landfills, including the Puente Hills Landfill and~~ the Sunshine Canyon Landfill.

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Specifically, the Act required city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. California cities and counties are required to submit annual reports to the California Integrated Waste Management Board to update the Board on the city's progress toward the AB 939 goals.

Demolition and construction activities associated with development of the Project would generate construction debris that would need to be disposed of at landfills. Construction debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Much of this material would be recycled and salvaged to the maximum extent feasible in accordance with Mitigation Measure MM UT-1 below. Materials not recycled would be disposed of at landfills. By recycling most of the solid waste generated by construction of the Project, short-term construction impacts on landfills would be less than significant.

As shown in Table 44, Existing and Project Estimated Solid Waste Generation, operation of the Project is anticipated to generate a net increase of 7,500 pounds per day of solid waste over existing uses, before recycling activities. As previously discussed, solid waste generated by the Project would be disposed of at ~~the Puente Hills Landfill and/or~~ the Sunshine Canyon Landfill. ~~The Puente Hills Landfill is permitted to intake a maximum of 13,200 tons per day of solid waste and currently accepts an average of 9,662 tons per day.[66,67]~~ The Sunshine Canyon Landfill has a

~~[66] California Integrated Waste Management Board, Solid Waste Information System, Facility Database, Puente Hills Landfill search, website: http://www.ciwmb.ca.gov/SWIS/19-AA-0053/Detail/, July 7, 2014.~~

~~[67] County Sanitation Districts of Los Angeles County, Solid Waste Facilities, Puente Hills Landfill, Puente Hills Landfill Annual Monitoring Report – 2011, Appendix 3, Summary of Waste Received, Disposed, Recycled, or Otherwise Diverted, website: http://www.lacsd.org/about/solid_waste_facilities/puente_hills/default.asp, July 7, 2014.~~

maximum permitted daily intake of 12,100 tons of solid waste per day and accepts an average of approximately 9,000 tons per day.[68,69] Therefore, the ~~Puente Hills Landfill has a remaining capacity of approximately 3,500 tons per day while the~~ Sunshine Canyon Landfill has a remaining capacity of approximately 3,100 tons per day.

Table 44
Project Estimated Solid Waste Generation

Type of Development	Size (sf)	Generation Rate[a]	Total (pounds/day)
Warehouse/ Industrial	1,500,000 sf	5 pounds/1,000 sf/day	7,500
Total Project Solid Waste Generation			**7,500**

[a] *County Sanitation Districts of Los Angeles County, 1992.*
Source (table): EcoTierra Consulting, 2014.

The amount of solid waste generated by the Project would represent approximately 0.5 percent of the remaining capacity at ~~the Puente Hills Landfill and at~~ the Sunshine Canyon Landfill. Therefore, ~~both the Puente Hills Landfill and~~ the Sunshine Canyon Landfill would have sufficient remaining capacity to accommodate the Project's solid waste disposal needs. Further, operations within the City and on the Project site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Therefore, impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan A

Less-Than-Significant With Mitigation Incorporated. Construction and operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. Demolition and construction activities associated with development of the Revised Site Plan A Project would generate construction debris that would be similar in volume to the Site Plan A project. Much of this material would be recycled and salvaged to the maximum extent feasible in accordance with Mitigation Measure MM UT-1. Short-term construction impacts on landfills would be less than significant.

As shown in Table 44a, Revised Site Plan A Project Estimated Solid Waste Generation, operation of the Project is anticipated to generate a net increase of 5,770 pounds per day of solid waste, before reductions from recycling activities. Solid waste generated by the Revised Site Plan A Project would be disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a maximum permitted daily intake of 12,100 tons of solid waste per day and accepts an average of approximately 9,000 tons per day. The Sunshine Canyon Landfill has a remaining capacity of approximately 3,100 tons per day.

[68] *California Integrated Waste Management Board, Solid Waste Information System, Facility Database, Sunshine Canyon Landfill search, website: http://www.ciwmb.ca.gov/SWIS/19-AA-2000/Detail/, July 7, 2014.*

[69] *Sunshine Canyon Landfill, Newsletter-Winter 2012, website: http://sunshinecanyonlandfill.com/home/news_newsletter.html, July 7, 2014.*

Table 44a
Revised Site Plan A Project Estimated Solid Waste Generation

Type of Development	Size (sf)	Generation Rate[a]	Total (pounds/day)
Warehouse/ Industrial	1,154,000 sf	5 pounds/1,000 sf/day	5,770
		Total Project Solid Waste Generation	**5,770**

[a] *County Sanitation Districts of Los Angeles County, 1992.*
Source (table): EcoTierra Consulting, 2014.

The amount of solid waste generated by the Revised Site Plan A Project would represent approximately 0.4 percent of the remaining capacity at the Sunshine Canyon Landfill. Therefore, the Sunshine Canyon Landfill would have sufficient remaining capacity to accommodate the Revised Site Plan A Project's solid waste disposal needs. Further, operations within the City and on the Project site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan B

Less-Than-Significant With Mitigation Incorporated. Construction and operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Demolition and construction activities associated with development of the Revised Site Plan B Project would generate construction debris that would be similar in volume to the Site Plan B project. Much of this material would be recycled and salvaged to the maximum extent feasible in accordance with Mitigation Measure MM UT-1. Short-term construction impacts on landfills would be less than significant.

Operation of the Revised Site Plan B Project would generate the same level of solid waste as the Revised Site Plan A Project, based on the same size and uses. The Sunshine Canyon Landfill would have sufficient remaining capacity to accommodate the Revised Site Plan B Project's solid waste disposal needs. Further, operations within the City and on the Project site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Impacts would be less than significant and no mitigation measures would be required.

MM UT-1. *Construction debris shall be salvaged and recycled to the maximum extent feasible.*

g) Comply with federal, state, and local statues and regulations related to solid waste?

Less-Than-Significant Impact. The construction and operation phases of the Project would be required to adhere to all applicable federal, state, and local statutes and regulations related to solid waste. Project impacts would be less than significant and no mitigation measures would be required.

Revised Site Plan A

Less-Than-Significant Impact. Operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. The construction and operation phases of the Site Plan A Project would be required to adhere to all applicable federal, state, and local statutes and regulations related to solid waste. Impacts would be less than significant and no mitigation measures are required.

Revised Site Plan B

Less-Than-Significant Impact. Operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. The construction and operation phases of the Site Plan B Project would be required to adhere to all applicable federal, state, and local statutes and regulations related to solid waste. Impacts would be less than significant and no mitigation measures are required.

18. MANDATORY FINDINGS OF SIGNIFICANCE

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

No Impact. The Project is located in a developed and populated urban area. There are no candidate, sensitive, or special status species existing on or adjacent to the Project site. Additionally, no vegetation, fish, or wildlife habitat exists on the Project site. Therefore, as discussed in the responses to Questions 4(a) through 4(f), development of the Project would not degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause such species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of rare or endangered plants or animals. Furthermore, there are no structures or artifacts related to California history or prehistory found on the Project site. No impact would occur.

Revised Site Plan A

No Impact. Construction and operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. As discussed in the preceding sections, no impacts would occur in this regard, and no mitigation measures are required.

Revised Site Plan B

No Impact. Construction and operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. As discussed in the preceding sections, no impacts would occur in this regard, and no mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project site, would result in impacts, which are less than significant when viewed separately, but would be significant when viewed together.

The Project, in conjunction with projected cumulative growth, would not violate any air quality standard or contribute substantially to an existing or projected air quality violation as outlined in Response 3(b). Moreover, the Project, in conjunction with projected growth in the Basin, would not violate any air quality standard or contribute substantially to an existing or projected air quality

violation, as it would be consistent with the AQMP and would not hinder the region's ability to meet clean air standards (see Response 3).

There are four related projects in the vicinity of the Project, two of which are located within the same "superblock" as the Project. To the extent that construction schedules for the Project and these two related projects were to overlap, cumulative construction noise impacts could occur. However, these impacts would be temporary and limited to the construction period. Furthermore, both the Project and related projects would be subject to the City's restrictions on construction hours, and would be expected to be subject to the same mitigation measures as identified for the Project, which the City would impose as Conditions of Approval. Accordingly, cumulative construction noise impacts would be less than significant.

As shown in Tables 18 and 19 (see Response 12(a)), the Project, in conjunction with traffic generated by related projects and other cumulative growth, would result in cumulative traffic noise increases over existing conditions. The largest increase, under both Site Plan A and Site Plan B, would occur on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. The cumulative increase would be 2.2 dBA CNEL under Site Plan A and 2.3 dBA CNEL under Site Plan B. These increases would be below the 3 dBA threshold of audibility and, therefore, cumulative traffic noise impacts would be less than significant.

Finally, the analysis of potential traffic impacts, which includes the effect of cumulative traffic growth, concluded that impacts would be less than significant (see Response 16) with implementation of the identified mitigation measures. Remaining impacts associated with the Project would either result in no impacts, be less than significant, or would be mitigated to less than significant levels. In addition, as remaining impacts would, at worst, be mitigated to a less-than-significant level, they would be sufficiently limited so as to preclude any substantial contribution to cumulative effects. Therefore, the Project would not result in impacts that are individually limited, but cumulatively considerable. Impacts would be less than significant.

Revised Site Plan A

Less Than Significant Impact With Mitigation Incorporated. Construction and operations under Revised Site Plan A would be similar to Site Plan A and Site Plan B. As discussed in Response 3(c) above, cumulative air quality would be less than significant. As shown in Tables 19 and 20 (see Response 12(a)), the Project, in conjunction with traffic generated by related projects and other cumulative growth, would result in cumulative traffic noise increases over existing conditions. The largest cumulative increase, under both Site Plan A and Site Plan B, would occur on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. The cumulative increase would be 3.9 dBA CNEL under Site Plan A and 4.0 dBA CNEL under Site Plan B. These cumulative increases would result in future CNELs of 63.5 dBA for Site Plan A and 63.6 dBA on the segment of McKinley Avenue between Rosecrans Avenue and 139th Street. These noise levels would fall within the City's acceptable noise levels by land use for residential, commercial, industrial, and institutional land uses. As described previously, a less than 5 dBA increase is noticeable, but would not be considered significant if total noise levels remain below the City's acceptable noise levels by land use. As such, these increases would be below the 5 dBA threshold and, therefore, cumulative traffic noise impacts would be less than significant. The analysis of potential traffic impacts, which includes the effect of cumulative traffic growth, concluded that impacts would be less than significant (see Response 16) with implementation of the identified mitigation measures. Remaining impacts associated with the Project would either result in no impacts, be less than significant, or would be mitigated to less than significant levels. In addition, as remaining impacts would, at worst, be mitigated to a less-than-significant level, they would be

sufficiently limited so as to preclude any substantial contribution to cumulative effects. Impacts would be less than significant after implementation of the traffic mitigation measures.

Revised Site Plan B

Less Than Significant Impact With Mitigation Incorporated. Construction and operations under Revised Site Plan B would be similar to Site Plan A and Site Plan B. Cumulative air quality and noise impacts would be less than significant. The analysis of potential traffic impacts, which includes the effect of cumulative traffic growth, concluded that impacts would be less than significant (see Response 16) with implementation of the identified mitigation measures. Remaining impacts associated with the Project would either result in no impacts, be less than significant, or would be mitigated to less than significant levels. In addition, as remaining impacts would, at worst, be mitigated to a less-than-significant level, they would be sufficiently limited so as to preclude any substantial contribution to cumulative effects. Impacts would be less than significant after implementation of the traffic mitigation measures.

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

No Impact. As noted in the responses to Questions 1 through 17 above, with implementation of the recommended mitigation measures, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings. No impact would occur.

Revised Site Plan A

No Impact. As noted in the responses to Questions 1 through 17 above, with implementation of the recommended mitigation measures, the Revised Site Plan A Project would not result in any unmitigated significant impacts. Thus, the Revised Site Plan A Project would not have the potential to result in substantial adverse effects on human beings. No impact would occur.

Revised Site Plan B

No Impact. As noted in the responses to Questions 1 through 17 above, with implementation of the recommended mitigation measures, the Revised Site Plan B Project would not result in any unmitigated significant impacts. Thus, the Revised Site Plan B Project would not have the potential to result in substantial adverse effects on human beings. No impact would occur.

19. LEAD AGENCY

City of Compton
Planning and Economic Development Department
Planning Division
205 South Willowbrook Avenue
Compton, CA 90220

Robert Delgadillo, Interim Director of Planning
Teresa Li, Contract Planner

CEQA Consultant

EcoTierra Consulting, Inc.
555 W 5th Street, 31st Floor
Los Angeles, CA 90013
Craig Fajnor, Principal/Project Manager
Jennifer Johnson, Environmental Planner

Traffic Consultant

Hirsch/Green Transportation Consulting, Inc.
13333 Ventura Boulevard, #204
Sherman Oaks, California 91423
Ron Hirsch, Principal
Aaron Green, Principal

Air Quality/Noise Consultant

Pomeroy Environmental Services
25101 The Old Road, Suite 246
Santa Clarita, CA 91381
Brett Pomeroy, President

Historic Consultant

Galvin Preservation Associates
231 California Street
El Segundo, CA 90245
Teresa Grimes, Senior Architectural Historian

Hydrology Consultant

Kimley-Horn and Associates, Inc.
65 The City Drive, # 400
Orange, CA 92868
Jason Marechal, P.E., Senior Engineer

Geology Consultant

GPI Geotechnical Professionals, Inc.
5736 Corporate Avenue
Cypress, CA 90630
Paul R. Schade, G.E., Principal

Hazardous Materials Assessment Consultant

Tetra Tech, Inc.
17885 Von Karman Avenue, Suite 500
Irvine, CA 92614
Steven Grod, Project Manager
Jon Lovegreen, Manager

20. REFERENCES

2012 Air Quality Management Plan.

Assembly Bill 32 (Statewide GHG Reductions.

California CEQA Guidelines, Appendix G.

California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, GIS data, website.

California Department of Conservation, Division of Land Resource Protection, Williamson Act Protection, website.

California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.

California Geological Survey, USGS AASG Website.

California Green Building Standards (CALGreen) Code.

California Integrated Waste Management Board, Solid Waste Information System, Facility Database, website.

California Manual on Uniform Traffic Control Devices for Streets and Highways, 2012 Edition (FHWA's MUTCD 2009 Edition, as amended for use in California.

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard.

City of Compton General Plan, 1991.

City of Compton Fire Department.

City of Compton Municipal Code.

City of Compton Municipal Water District.

City of Compton 2010 Urban Water Management Plan.

City of Compton website.

City of Los Angeles Department of Transportation.

City of Los Angeles CEQA Thresholds Guide, 2006.

Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

FEMA Flood Insurance Rate Map (FIRM), Los Angeles County, California Panel 1795 of 2350, website.

FHWA Noise Barrier Design Handbook, updated July 14, 2011.

Geotechnical Investigation for the Proposed Brickyard Commerce Center, prepared by GPI Geotechnical Professionals, Inc., May 2014.

Groundwater Monitoring Plan, Former Atkinson Brick Company Property, 13633, 13801, and 13805 South Central Avenue, Compton, California 90220, prepared by Tetra Tech, Inc., March 2014.

Historic Resources Report for the Brickyard Commerce Center, 13633 S. Central Avenue, Compton, California, prepared by Galvin Preservation Associates, May 2014.

LADOT Traffic Study Policies and Procedures, June 2013.

Los Angeles County Airport Land Use Commission, Compton Airport Influence Area, May 13, 2003.

Los Angeles County Congestion Management Program.

Los Angeles County Department of Public Works Traffic Impact Analysis Report Guidelines, January 1, 1997.

Los Angeles Region Water Quality Control Board, Basin Plan.

Mobile Source (Diesel Truck) Health Risk Assessment for the Proposed Brickyard Commerce Center prepared by Pomeroy Environmental Services, July 2014.

National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.

NPDES No. CAS000002, State Water Resources Control Board Order No. 2012-0006-DWQ, the "Statewide General Construction Permit".

Parking Generation, 4th Edition, Institute of Transportation Engineers, Washington, D. C., 2010.

Phase I Environmental Site Assessment for the Atkinson Brick Company Property 13633, 13801, and 13805 South Central Avenue Compton, California 90220, prepared by Tetra Tech, Inc., December 2013.

Phase II Subsurface Investigation Atkinson Brick Company Property 13633, 13801, and 13805 South Central Avenue Compton, California 90220, prepared by Tetra Tech, Inc., January 2014.

Pre-Demolition Hazardous Materials Survey for the Atkinson Brickyard, located at 13633 South Central, 13801 South Central, and 1805 South Central, Compton California, prepared by UE Environmental, Inc., November 2013.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on April 4, 2012.

Sanitation Districts of Los Angeles County, Joint Water Pollution Control Plant, website.

SCAG, RTP/SCS Forecast, website.

State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Oil, Gas & Geothermal District Maps, District 1, Map No T03S R13W, website.

State Water Resources Control Board.

Southern California Association of Governments (SCAG).

Sustainable Communities and Climate Protection Act (SB 375).

Traffic Impact Analysis Report for the Proposed Brickyard Commerce Center, 13801, 13805 and 13633 S. Central Avenue, Compton, California, prepared by Hirsch/Green Transportation Consulting, Inc., June 2014 (Revised November 2014).

United States Census, website.

Updated Remedial Action Plan for the Atkinson Brick Company Property 13633, 13801, and 13805 South Central Avenue Compton, California 90220, prepared by Tetra Tech, Inc., February 2014.

U.S. Environmental Protection Agency.

U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website.

Written Correspondence with Captain Leonard McCray, Los Angeles County Sherriff's Department, dated August 29, 2014.

VI. COMMENTS AND RESPONSES

The Draft Initial Study/Proposed Mitigated Negative Declaration (IS/PMND) was released for public comment on December 22, 2014. The comment period ended on January 21, 2015, meeting the 30-day review period required by the California Environmental Quality Act (CEQA). During that time, the Lead Agency received comments on the Draft IS/PMND from four agencies and one individual, in form of comment letters. The following pages include the comment letters and responses to comments raised in each comment letter.

COMMENT LETTER NO. 1

Rick Holland
Acting IGR/CEQA Branch Chief
DEPARTMENT OF TRANSPORTATION
District 7
100 S. Main Street, MS 16
Los Angeles, CA 90012

Dated: January 26, 2015

Response to Comment No. 1-1:

The commenter notes Caltrans' jurisdiction over State highway transportation facilities, including the I-110, I-105, SR-91, and I-710 and notes the potential for increase in heavy duty truck traffic from the Project that could affect these facilities. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The commenter cites the proposed mitigation improvements to the intersection of SR-91 Westbound Off-ramp/Artesia Boulevard and Central Avenue that are presented in the Draft IS for Site Plan A and requests that the improvement be implemented prior to buildout of the Project. The commenter further requests that the mitigation improvements include traffic signal modifications and ADA improvements. The Draft IS identifies an impact during the PM peak hour at this intersection from traffic generated by Site Plan A. As discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. As a result of the reduction in square footage provided in Revised Site Plan A, and the associated approximately 23% reduction in automobile and truck traffic, the previously identified impact at the intersection of SR-91 Westbound Off-ramp/Artesia Boulevard and Central Avenue would be reduced below the significance threshold (see Final IS, Tables 31a and 41b). As such, Mitigation Measure TR-5, as presented in the Draft IS, is no longer required.

Response to Comment No. 1-2:

This commenter requests that an off-ramp queuing analysis to be preformed at the I-110 Northbound off-ramps to Rosecrans Avenue, and I-105 Westbound off-ramp to Central Avenue to determine queuing storage capacity. As discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. Revised Site Plans A and B are expected to result in overall reductions to the site-related traffic on the I-105 WB Off-Ramp at Central Avenue during both the AM and PM peak hours. During the AM peak hour, the I-105 WB Off-Ramp is expected to experience a net reduction in traffic of approximately 14 PCE-adjusted vehicles (increase of 11 autos but a reduction of 25 PCE-adjusted truck trips), while during the PM peak hour, it would experience a net reduction of 17 PCE-adjusted vehicles (increase of 4 autos but reduction of 21 PCE-adjusted truck trips). As a result, project-related impacts on ramp operations and queuing capacity will be nominal or actually slightly improve conditions.

For the I-110 NB Off-Ramp at Rosecrans Avenue, that location could exhibit a net increase of approximately 4 net PCE-adjusted trips during the AM peak hour (increase of 10 autos, but decrease of 6 PCE-adjusted truck trips), and a net increase of approximately 10 PCE-adjusted trips during the PM peak hour (increase of 3 autos, increase of 7 PCE-adjusted truck trips). As such, during the AM peak hour, the slight increase in auto traffic would be nearly offset by the reduction in truck trips, and again, no impacts to the ramp operations or queuing capacity are anticipated. During the PM peak hour, although it is anticipated that the project would result in an overall net increase of 10 PCE-adjusted trips, in actuality, the actual number of new vehicles would be 3 autos (as noted above) and the equivalent of about 2 or 3 semi-trailer trucks over the course of a one-hour period. These relatively nominal increases in traffic at

the off-ramp is not expected to result in any measurable impacts to the ramp operations or queuing capacity, as the ramp itself provides over 1,200 feet of linear single-lane storage, plus approximately 400 additional feet of storage as it widens to provide two lanes as it approaches Rosecrans Avenue. As a result, Revised Site Plan A and Revised Site Plan B are expected to either result in reductions in traffic on the ramps (I-105 WB Off-Ramp at Central Avenue) or result in only minor increases (I-110 NB Off-Ramp at Rosecrans Avenue) that would not affect operations. Therefore, no additional analyses are warranted.

Response to Comment No. 1-3:

The commenter concurs with restricting haul truck activity during off-peak hours (between 9:00 AM and 4:00 PM). The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The commenter further requests that hauling trucks be spaced to minimize truck platoons on the area freeways. It is expected that the limited intensity of the haul activity associated with export of soil from the project site (30 truckloads per hour over a 9 to 15 day period) would not result in tight spacing of haul trips. Nonetheless, site managers will be instructed to space trucks evenly during this activity so as to avoid this effect.

Response to Comment No. 1-4:

The commenter recommends that the Project include a traffic management plan that specifies truck access routes to the Project. This comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The Project includes a Condition of Approval that limits truck movements to truck routes designated in the City's General Plan, including Wilmington Avenue (between the northern City limit and the 91 freeway), Central Avenue (between the project's southern driveway on this street and Rosecrans Avenue), and McKinley Avenue (between the site's access and Rosecrans Avenue).

Response to Comment No. 1-5:

The commenter recommends the provision of secure bicycle storage areas, vanpool preferred parking and incentives for use of public transit to reduce vehicle trips. As discussed in the Draft IS (pages 184 through 187), the Project will not conflict with transit service in the Project area and will meet the City's requirements for bicycle parking. Bicycle facilities will be secured and located within the Project's secured boundaries.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

January 26, 2015

Mr. Robert Delgadillo
City of Compton
Planning and Economic Development Department
205 South Willowbrook Ave
Compton, CA 90220

Re: **Brickyard Commerce Center**
Mitigated Negative Declaration
SCH#2014121073, IGR No: 150109/EA
Vic: LA/ 91 /PM 8.628, LA /110/PM 11.707

Dear Mr. Delgadillo:

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration report for the proposed Brickyard Commerce Retail Center project. The proposed project involves two potential site plan options, Site Plan A and B. Site Plan A consists of a 1.43 million square foot light industrial warehouse/distribution building, and a 70 thousand square foot light industrial building. The warehouse building would provide 208 truck loading doors, 575 auto stalls, and space for 437 shipping containers. Site Plan B consists of a 525,400 square foot light industrial warehouse/distribution building with 88 truck loading doors. Site Plan B also includes a 70,000 square foot building that would provide 111 truck loading doors. A total of 314 storage spaces for shipping containers would be provided in Site Plan B.

As the State agency with jurisdiction over State highway transportation facilities, mainly I-110, I-105, State Route 91, and I-710, we are concerned with potential increase in heavy duty truck traffic volumes directed to them as it might exacerbate existing congestion. Caltrans has the following comments: 1-1

- According to the Traffic Impact Analysis (TIA) prepared, the proposed project is forecast to contribute to cumulative transportation impacts to the intersection at SR-91 Westbound Off-Ramp/Artesia Boulevard and Central Avenue, and the following mitigation improvement is proposed:

  MM-TR-5: "Prior to the issuance of building permits, the applicant shall submit to the City of Compton Director of Public Works/Municipal Utilities and City of Carson a restriping plan for the intersection at Artesia Boulevard/SR-91 Freeway WB On/Off-Ramps and Central Avenue for review and approval. The restriping plan shall include the restriping of the westbound approach to Artesia Boulevard, which also serves the westbound off-ramp for the Artesia (SR-91) Freeway, to add a new right-turn only lane. In addition to the existing left-turn, shared through/left-turn, and shared through/right-turn lanes. Additionally, the curb radius at the northeast corner of the intersection should be increased (to approximately 45 feet), and the existing raised median island on the north leg

#10.

of Central Avenue should be shortened by approximately 40 feet, in order to accommodate the turning characteristics of large semi-trailer trucks." Please coordinate this improvement with Caltrans as it will require an encroachment permit. We request that this improvement be implemented in a timely manner by build-out of the proposed project. Please include traffic signal modifications, and ADA improvements as part of the mitigation improvements. **1-1 cont.**

- The TIA used the Critical Movement Analysis ("CMA") methodology as the basis for the analysis and evaluation of traffic operations at signalized intersections. However, the 2010 "Highway Capacity Manual should be used to analyze state controlled intersections. We are concerned that there may be some impacts to freeway ramp intersections because off-ramp queuing analysis has not been performed. Caltrans requests that a queuing analysis be performed at the I-110 Northbound off-ramps to Rosecrans Avenue, and I-105 Westbound off-ramp to Central Ave to determine whether there is sufficient storage capacity to accommodate projected vehicle queues during peak hours. Mitigation improvements should be required if projected queues are expected to exceed existing storage capacity. **1-2**

- During construction, the Project could include excavation and export or import of up to 30,000 Cubic yards of dirt. It is expected that the haul activities would utilize 14 cubic yard capacity trucks, with peak activity of approximately 30 truckloads (one way) per hour over the course of the working day, over a 9- to 15-day period during the grading/excavation period. We concur with the restriction of haul truck activity to off-peak hours (between the hours of 9:00 AM and 4:00 PM) to eliminate any peak hour impacts. In addition, please space hauling trucks so as to avoid truck platoons on freeways. **1-3**

- Caltrans recommends the project develop a traffic management plan which includes a preferred truck access route. The preferred truck route should reflect the assumed truck distribution in this TIA. To the extent that more trucks follow the same route, truck traffic impact would be concentrated on that route. The preferred truck route should be distributed to truck drivers and monitored on a regular basis. **1-4**

- We also recommend the provision of secure bicycle storage areas, vanpool preferred parking, and incentives for the use of public transit in order to reduce vehicle trips. **1-5**

If you have any questions regarding these comments, please feel free to contact me at (213) 897 – 4230 or project coordinator Elmer Alvarez at (213) 897-6696 or electronically at elmer.alvarez@dot.ca.gov.

Sincerely,

Rick Holland

RICK HOLLAND
Acting IGR/CEQA Branch Chief
Caltrans, District 7

COMMENT LETTER NO. 2

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
21865 Copley Drive
Diamond Bar, CA 91765-4178

Dated: January 20, 2015

Response to Comment No. 2-1:

This comment provides introductory information related to the SCAQMD's role as a commenting agency and notes their comments are meant as guidance for the consideration of the Lead Agency. As this comment does not raise any specific concerns related to the adequacy of the Project's environmental analysis, no further response is necessary.

Response to Comment No. 2-2:

This comment summarizes the project characteristics presented in the Project's published Draft IS/MND. As this comment does not raise any specific concerns related to the adequacy of the Project's environmental analysis, no further response is necessary. However, as discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. This reduction would result in a total of 1,939 unadjusted daily vehicle trips, of which 1,543 would be passenger cars (LDA) and 396 would be trucks. This represents an approximate 23% reduction compared to the trips associated with the original Site Plan A that were disclosed and analyzed in the Draft IS/MND.

Response to Comment No. 2-3:

This comment states the Project's potential mix of automobile and truck traffic if the Institute of Transportation Engineers (ITE) trip rates for automobiles and trucks are utilized. This comment also summarizes the Project's potential truck routes along streets that contain existing sensitive receptors. With respect to the ITE truck trip rates, see Response to Comment 2-9. With respect to project truck routes and potential impacts upon sensitive receptors, the Project's published Draft IS/MND adequately concluded impacts to sensitive receptors would be less than significant (see Response to Comment 2-13).

Response to Comment No. 2-4:

This comment notes the SCAQMD staff concerns related to potential health effects and air quality impacts presented in the Project's published Draft IS/MND. Specifically, the comment summarizes concerns related to the vehicle and truck trip rates, trip lengths, and recommended 1,000 foot buffer between on-site truck activities and nearby sensitive receptors. As noted in the comment, the SCAQMD attached detailed comments related to these and other issues. Response to issues raised by SCAQMD can be found in Responses to Comments 2-6 through 2-18.

Response to Comment No. 2-5:

This comment requests the Lead Agency provides written responses to all comments prior the adoption of the MND by the Lead Agency. This comment also provides contact information for any questions

related to the comments provided. Although not required by CEQA or the CEQA Guidelines, the Lead Agency shall provide the SCAQMD with written responses to all comments prior the adoption of the MND by the Lead Agency. In addition, as required by CEQA Guidelines Section 15073(e), the Lead Agency will notify any public agency which comments on a proposed mitigated negative declaration, of any public hearing to be held on the project for which the document was prepared.

Response to Comment No. 2-6:

This comment states the localized significance threshold (LST) applied for the on-site construction analysis incorrectly interpolated LSTs for the Project's 4-acre daily soil disturbance area, and the commenter suggests the application of the two-acre threshold. As stated in the Draft IS/MND, the CalEEMod User's Guide (Appendix A: Calculation Details for CalEEMod, page 8-9) states the applicable LST should be based on the equipment list in the grading or site preparation phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday. The Draft IS/MND identified (Appendix A) maximum daily grading, site preparation and foundation activities would require the following equipment: one grader (0.5 acres per 8 hour day), two excavators (0.5 acres per 8 hour day each, for a total of 1.0 acre), two scrapers (0.5 acres per 8 hour day each, for a total of 1.0 acre), one rubber tired dozer (0.5 acres per 8 hour day), and two tractors/loaders/backhoes (0.5 acres per 8 hour day each, for a total of 1.0 acre). Based on this equipment fleet and the CalEEMod User's Guide, a maximum of approximately 4.0 acres of soil disturbance area would occur on the worst-case day. Thus, to compare this proposed 4.0-acre activity area to a 2.0-acre threshold as suggested in the comment would not be appropriate and would substantially overstate the Project's impacts in this regard. As such, the Project's LSTs for a 4.0-acre soil disturbance area were correctly calculated based on the SCAQMD's published guidance document for assessing localized construction impacts.[70] Page 2-5 of this guidance document provides clarification for when a proposed project's disturbance area is between the project acreages on the LST mass rate look-up tables. Specifically, page 2-5 states:

"In this situation, the lead agency has two options. The first and easiest option would be to use the sample construction scenario and LSTs for acreage that is smaller than the proposed project. For example, if the proposed project is 2.5 acres, then use the two-acre sample construction scenario and LSTs.

The second option would be to develop LSTs from a ratio of the known LSTs for the smaller and larger acreages. For example, if the proposed project is 3.7 acres, then LSTs for 3.7 acres can be predicted from three and four acre mass rate LST look-up table values by a ratio of the areas. Appendix K contains a methodology for estimating the LSTs by linear regression."

Consistent with the second option in the SCAQMD's published guidance document, the Project's construction LSTs for a 4.0 acre disturbance area were properly estimated through the application of the linear regression methodology. Appendix A to the Project's Draft IS/MND included a linear regression calculation sheet supporting the 4.0 acre LST based on the mass rate lookup tables for 1, 2 and 5 acre sites. Therefore, the Project's air quality construction analysis is consistent with SCAQMD published guidance documentation and the Draft IS/MND correctly concluded that localized construction air quality impacts would be less than significant.

[70] Sample Construction Scenarios for Projects Less than Five Acres in Size, SCAQMD, February 2005, see page 2-5. See also Appendix K – Linear Regression to Sample Construction Scenarios for Projects Less than Five Acres in Size, accessed January 30, 2015..

Response to Comment No. 2-7:

The commenter suggests, similar to Comment 2-6, that project operations should have been compared to LSTs for a 2.0-acre a site, and that project emissions would exceed 2.0-acre operational LSTs. The analysis conservatively applied a 5.0-acre operational LST and the suggestion to apply a 2.0-acre LST would not be appropriate for the Project Site. As discussed in detail in the Draft IS/MND, the primary source of on-site operational emissions would be from motor vehicles traversing the Project Site (more than 99% of on-site operational emissions). As stated in the Draft IS/MND, operational on-site emissions were based on an assumption that each daily on-site vehicle trip (truck and auto) would be 1.2 miles in length. Based on 2,520 daily trips for Site Plan A, this results in a conservative estimate that up to 3,024 miles would be traveled on-site per day. Considering the Project Site is 0.44 miles long from the southern boundary of Rosecrans Avenue to the northern boundary of Sam Littleton Street, this assumption is conservative and likely overstates the on-site vehicle miles traveled on a daily basis. Based on the size of the Project Site, and layout and access plans for on-site vehicular traffic, it would be physically impossible to generate this volume of daily on-site travel on a 2-acre area, as suggested. Specifically, based on a review of the project plans, approximately 17.6 acres of the Project Site would be designated for automobile and container parking areas, and approximately 12.5 acres of the Project Site would be designated for driveways and building adjacent operating space (for loading/unloading activities). Thus, the daily on-site motor vehicle activity (99% of the on-site emissions) would occur over an approximate 30.1-acre area. Therefore, the application of a 5.0-acre threshold for an activity that would actually occur over an approximate 30.1-acre area essentially condenses the area of activity by more than six times than would occur in reality. Even with this conservative threshold application, localized on-site operational emissions would not exceed thresholds. Therefore, the Project's operational LST analysis in the Draft IS/MND was conservative and worst-case, and appropriately concluded that localized operational impacts would be less than significant.

In addition, as discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. This reduction would result in a total of 1,939 unadjusted daily vehicle trips, of which 1,543 would be passenger cars (LDA) and 396 would be trucks. This represents an approximate 23% reduction compared to the trips associated with the original Site Plan A that were disclosed and analyzed in the Draft IS/MND. The air quality and health impacts associated with Revised Site Plans have been studied in detail and are included in Section 3 of the Final IS/MND. As shown therein, air quality and associated health impacts associated with the revised site plans would be less than significant, and impacts would be reduced compared to the less-than-significant impacts disclosed in the Draft IS/MND.

Response to Comment No. 2-8:

The commenter suggests that mitigation should be incorporated into the Final IS/MND as a result of potential new impacts identified in Comments 2-6 and 2-7 above. As detailed in the Responses to Comments 2-6 and 2-7, the Project's LST analyses in the Draft IS/MND were conservative and appropriately concluded that localized air quality impacts would be less than significant. Thus, no mitigation measures, beyond those already identified in the Draft IS/MND, would be necessary. Nevertheless, as detailed in Responses to Comments 2-14 to 2-18 below, the Project Applicant has agreed to voluntarily add several SCAQMD-suggested measures to reduce air quality emissions to the extent feasible.

Response to Comment No. 2-9:

The commenter suggests that the use of truck trip generation rates other than those identified by the Institute of Transportation Engineers ("ITE") represents the use of "non-standard" information. The truck trip rates used in the study were obtained from the City of Fontana Truck Trip Generation Study, which

surveyed and analyzed the both the absolute number of trucks and percentage of total traffic consisting of trucks for a number of warehouse and distribution center-type projects specifically within the Southern California region. Additionally, the Fontana study data provides significant additional details regarding the breakdown of the type of truck trips produced at these facilities (2-axle, 3-axle, 4-axle), along with information related to the directionality of truck trips during both the AM and PM peak hours. The ITE data does not provide such specific details, and in fact, provides only the truck trip rate itself, with no distinction between the type of truck or directionality of the trips. Further, it is important to note that the truck rates from the ITE manual represent nationwide operations of the high-cube warehouse facilities, whereas the Fontana Truck Study information is more directly applicable to the Project, since it was developed specifically from warehouse uses located within the Southern California region. As such, the use of the Fontana truck trip data contained in the traffic study is considered to provide a more accurate assessment of potential truck-related trips and their associated impacts, as compared to the less specific data contained in the ITE manual as recommended by the commenter.

Response to Comment No. 2-10:

This comment suggests the on-road mileage for future employees of project operation (16.6 miles one way) and for delivery trucks moving goods to and from the facility (8.4 miles one-way) could be underestimated. The Project is centrally located in the heavily urbanized greater Los Angeles area, approximately 8 miles north of the ports of Los Angeles and Long Beach and within close proximity to many potential future Project employees. Thus, the Draft IS/MND appropriately utilized the trip lengths for both employees and delivery trucks of industrial warehouse/distribution uses located in urban areas as prescribed in the SCAQMD-recommended California Emissions Estimator Model (CalEEMod 2013.2.2). For these reasons, the analysis provided in the published Draft IS/MND and associated technical studies represents a reasonable estimate of the potential impacts of the Project, including potential air quality impacts. Accordingly, the Lead Agency has appropriately evaluated the Project in the Draft IS/MND.

In addition, as discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. This reduction would result in a total of 1,939 unadjusted daily vehicle trips, of which 1,543 would be passenger cars (LDA) and 396 would be trucks. This represents an approximate 23% reduction compared to the trips associated with the worst-case original Site Plan A disclosed and analyzed in the Draft IS/MND. The air quality and health impacts associated with Revised Site Plans have been studied in detail and are included in Section 3 of the Final IS/MND. As shown therein, air quality and associated health impacts associated with the revised site plans would be less than significant, and impacts would be reduced compared to the less-than-significant impacts disclosed in the Draft IS/MND.

Response to Comment No. 2-11:

The commenter recommends that the Lead Agency utilize a more recent version of the dispersion model (AERMOD) used in the Project HRA. It should be noted that this comment does not state any known deficiencies or errors associated with the AERMOD version used in the original Project HRA, nor does the comment state the model used would have the potential to underestimate the health risks of the Project. In addition, based on a review of the AERMOD update notes, no known glitch fixes or other enhancements have occurred in the model updates that would have the potential to substantively change the outcome of the dispersion modeling conducted for the original Project HRA.[71] Further, it should be noted that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information

[71] http://www.epa.gov/scram001/dispersion_prefrec.htm

requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental analysis. Thus, the dispersion modeling and HRA conducted for the original Site Plan A represents a reasonable estimate of the health risks associated with the original Project. Accordingly, the Lead Agency appropriately evaluated the Project as originally proposed in the published Draft IS/MND.

It should also be noted that the commenter's concerns with regard to the HRA were based on the Lead Agency's determination that the Draft IS/MND analysis for the original Site Plan A "showed almost significant residential impacts for cancer risk." As discussed in the Final IS/MND, Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, were developed in response to concerns regarding the overall size of the Project and associated impacts. Moreover, as suggested in this comment, the HRA and associated dispersion modeling for the Revised Site Plans was conducted using the most recent version of AERMOD (version 14134). As shown in the Final IS/MND and Appendix B-2 to the Final IS/MND, health risk impacts associated with the revised site plans would be less than significant, and impacts would now be reduced well below the residential cancer risk thresholds as compared to the less-than-significant impacts disclosed in the published Draft IS/MND.

Response to Comment No. 2-12:

The commenter suggests that the Project HRA used discrete receptors that were placed randomly, and recommends instead the use of a uniform receptor grid. In the analysis presented in the Draft IS/MND, the discrete receptors were placed in representative and best-fit locations for representing effects on on-site worker receptors based on the building footprints identified in the original project site plans, and effects on adjacent residents by using the locations of the closest off-site residential receptors. Thus, the receptors were not placed randomly and health risks were adequately represented and disclosed for the original Project HRA.

However, as suggested by the commenter, the HRA and associated dispersion modeling conducted for Revised Site Plans A and B included the use of a uniform receptor grid placed over the entire modeling area. As shown in the Final IS/MND and Appendix B-2 to the Final IS/MND, health risk impacts associated with the revised site plans would be less than significant, and impacts would be reduced compared to the less-than-significant health risk impacts disclosed in the Draft IS/MND.

Response to Comment No. 2-13:

This commenter suggests that the original Project HRA potentially underestimated health risks along local streets and arterials along the truck transit routes to and from the closest freeways. The original Project HRA focused on the one-quarter mile vicinity surrounding the Project Site and included worst-case DPM emissions associated with off-site truck travel within 0.25 miles, on-site truck travel, and on-site idling. These emissions calculations did not take credit for existing (Project Site 2014) truck trips, and as a result, potentially overstated DPM emissions by approximately 30%. Based on these conservative DPM emission estimates, the original Project HRA disclosed maximum on- and off-site health risks in the highest impact areas within 0.25 miles of all project truck activity, and corresponding health risks were found to be less than significant. As health risks would not exceed thresholds in the highest impact areas with the maximum DPM exposures possible, then there would be no potential for receptors located more than 0.25 miles from the site's vicinity with significantly less DPM exposures to experience health risks greater than those disclosed, or greater than the significance threshold. Nevertheless, for reference purposes, based upon a review of the original Project HRA Appendix B (see receptor posting graphic), DPM concentrations were identified to be 0.014 $\mu g/m^3$ at off-site receptors along the truck transit route in the vicinity of the intersection Rosecrans Avenue and Central Avenue (the Project's highest off-site truck-traffic corridor). This DPM concentration results cancer risks of approximately 4.46 per million for 70-year residential scenario, 0.88 per million for 40-year worker scenario, and 0.86 per million for 9-year school-age child scenario. All of these exposures would be well under the significance threshold of 10 per million

for receptors fronting the Project's highest off-site truck-traffic corridor, and thus, project-related DPM exposure for all receptors along all local streets and arterials to and from the closest freeways would also be below significance thresholds.

In addition, as suggested by the commenter, the HRA prepared for Revised Site Plans A and B added an exposure calculation for the maximum off-site receptor along the local streets and arterials. As shown in the Final IS/MND and Appendix B-2 to the Final IS/MND, a maximum incremental carcinogenic risk of 3.82 per one million for the 70-year residential scenario would occur for receptors fronting the intersection Rosecrans Avenue and Central Avenue (the Project's highest off-site truck-traffic corridor). As the exposure would be well under the significance threshold of 10 per million for receptors fronting the Project's highest off-site truck-traffic corridor, project-related DPM exposure for all receptors along all local streets and arterials to and from the closest freeways would also be below significance thresholds.

Response to Comment No. 2-14:

The commenter suggests that the Project include additional measures to reduce effects associated with truck idling. The commenter requests that additional information be provided in the Final IS/MND to show how truck queueing will be avoided. The Draft IS/MND included information and analysis (pages 139 through 147) of the vehicular access and circulation on the Project site. This analysis demonstrates that the design of the project driveways, taking into account the prospective location of security gates, and coupled with the addition of a left turn lane and new signalization on Central Avenue, will be sufficient to avoid truck queuing on adjacent streets under normal operating conditions. Nonetheless, the Project applicant has voluntarily agreed to include the following additional measures, although not needed to address significant Project impacts, as Conditions of Approval for the Project:

- Prohibit vehicles from idling in excess of five minutes while on-site;
- Post signs within the Project site informing truck drivers about idling regulations and health effects of diesel particulate matter;
- Post signs requiring truck engines to be turned off when not in use, prohibiting idling in excess of five minutes, and providing telephone numbers for the California Air Resources Board for reporting violations;
- Post signage prohibiting trucks on McKinley Avenue north of 138th Street and on Sam Littleton Street, and on Central Avenue north of the Project driveway.

The commenter's suggestion regarding the location of entry gates is not feasible because of security concerns, as trucks must be cleared prior to entering the Project site. The commenter's suggestion regarding signal synchronization is already included as a project design feature related to the installation of new traffic signals by the Project, which will include synchronization to the satisfaction of the City of Compton and Los Angeles County Department of Public Works. The commenter's suggestion regarding the regulation of off-site idling is infeasible as the Project and Project applicant do not control the operations of trucks when they are not on the Project site.

Response to Comment No. 2-15:

The commenter suggests additional measures to address impacts associated with VOC or NOx emissions that might be significant. As shown in the Final IS/MND, regional and localized emissions associated with the Project would be less than the applicable SCAQMD thresholds and would be less than significant. No mitigation measures are required. Moreover, the measures suggested by the commenter would not be feasible for inclusion in the Project. The Project would be warehouse facility for which future tenants are not known. Accordingly, it is not known whether a fleet of trucks would be operated from the facility, or whether the future tenant would exercise control over the types of trucks that

would serve the Project facilities. The Project Applicant would have no control over the type of trucks that would be used by a future tenant. Accordingly, the suggested measures that would require the use of 2010 compliant trucks, alternative fuel trucks, alternative fuel equipment, and accelerated phase in of non-diesel powered trucks would be infeasible for the Project.

The suggestion of a 1000 foot buffer zone between the project site and surrounding residential uses is based on guidance from CARB's 2005 Air Quality Handbook's "Advisory Recommendations" for Distribution Centers. As the title suggests, the Handbook provides only advisory suggestions, and recognizes that "land use agencies (such as the City of Compton) have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues." Given the site's configuration, proposed building location and the truck driveways' unavoidable proximity to surrounding residential neighborhoods, implementation of the recommended buffer is infeasible. Therefore, in light of the measure's infeasibility, and after carefully weighing: (1) the historic heavy manufacturing use of the site, (2) the significant remediation work that will occur prior to construction, (3) the mitigation measures currently proposed to reduce mobile source impacts, (4) the significant reduction in air quality impacts resulting from the reduction of square footage of Site Plan A identified in the Final IS/MND and (5) the substantial economic and public benefits that would result from approval and development of the Brickyard project, the Lead Agency elects not to mandate the recommended 1000 foot buffer requirement. Moreover, the Draft IS/MND includes a health risk assessment from Project operations that demonstrates that the Project would not exceed thresholds of significance based on the actual locations of sensitive receptors relative to the Project site. Thus, this measure is not required.

The limitations on truck activity would not be feasible as the future tenants of the facility are not known. However, the City would have the authority to revisit the Project's Conditional Use Permit in the event that higher activity at the Project site results in violation of the Project's Conditions of Approval, which relate to impacts on surrounding uses. The suggestion that on-site food options, fueling, truck repair and/or convenience stores on-site would not be feasible since the Project tenants have not been identified, and because of the necessary building footprint(s) size, and the areas that must be set aside to ensure adequate provision of automobile and truck parking and circulation on the Project site. Moreover, food and convenience stores are located immediately adjacent to the Project site that are within walking distance for truckers using the site, while trucks are being loaded or unloaded.

Response to Comment No. 2-16:

The commenter suggests that the Project include electric vehicle charging stations to reduce NOx emissions. Although not required to address a significant impact, the Project applicant has voluntarily agreed to include EV charging stations within the Project, which will be included as a Condition of Approval. The suggested measure regarding electrical hookups at on-site truck stops would not be applicable to the Project.

Response to Comment No. 2-17:

The commenter suggests that the Project include a Compressed Natural Gas (CNG) fueling station to reduce NOx emissions. As noted above, because tenants at the Project site are not known, it is not known and is unlikely that a fleet of trucks would be operated out of the Project site. Accordingly, truck fueling and maintenance facilities would not be included in the Project and this measure would not be applicable to the Project.

Response to Comment No. 2-18:

The commenter suggests additional measures to be included in the Project in the event that Project NOx emissions exceed SCAQMD significance thresholds. As shown in the Final IS/MND, regional and localized emissions associated with the Project would be less than the applicable SCAQMD thresholds

and would be less than significant. No mitigation measures are therefore required. Nonetheless, the Project applicant has voluntarily agreed to include the following additional measures recommended by SCAQMD, although not needed to address significant Project impacts, as Conditions of Approval for the Project:

- While the Project will not include solar panels, as the operating requirements of future tenants of the facility are not known, the structure will be designed to accommodate the installation of solar panels in the future, should tenants require or desire the use of solar energy in future operations at the Project site.
- Use light colored roofing materials and pavements to the extent practicable.
- Limit the use of outdoor lighting to safety and security needs. In addition, the Project will incorporate LED lighting in parking areas as a design feature.

The suggested measures to use Energy Star equipment and appliances, electric or alternatively fueled sweepers, or specific cleaning products would not be feasible as the operational requirements of future tenants of the Project are not known.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
rdelgadillo@comptoncity.org

January 20, 2015

Mr. Robert Delgadillo, Planning Manager
Planning and Economic Development Department
Planning Division
City of Compton
205 South Willowbrook Avenue
Compton, CA 90220

Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Brickyard Commerce Center Project (EA-MND-No. 933)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document. **2-1**

The Lead Agency proposes construction of two site plan options on the total 68.48 gross acre project site. Project construction for either plan would include approximately 146,000 cubic yards of cut and fill that will be balanced on-site. Construction is expected to take approximately 1.5 years to complete starting in 2015. Project operations are then estimated to begin at the end of 2017.

Site Plan Option A (Option A) consists of two buildings totaling 1.5 million square feet of light industrial, warehouse distribution uses: Bldg A-1, a 1.43 million square foot light industrial, warehouse distribution building that includes 208 loading docks and Bldg A-2, a separate 70,000 square foot light industrial building with 11 loading docks. **2-2**

Site Plan Option B (Option B) will have three buildings totaling 1,077,000 square feet including Bldg B-1, a 525,400 square foot light industrial warehouse/distribution building with 88 loading docks; Bldg B-2, a 481,600 square foot light industrial building with 111 loading docks; and Bldg B-3, a 70,000 square foot light industrial building with 11 loading docks.

Based on recommended guidance from the Institute of Transportation Engineers (ITE),[1] the proposed Project's Site Plan Option A could have as many as 2,520 total daily vehicle trips including 960 truck trips operating daily at full-project buildout beginning in year 2017. Estimated vehicle and truck activity for Site Plan Option B could have approximately 1,809 total daily trips including 689 daily truck trips operating at project **2-3**

[1] ITE, 9th Edition, Land Use 152 High-Cube Warehouse/Distribution Center 152, Weekday Weighted Average Truck Trip Generation Rate of 0.64 trip ends per 1,000 square feet.

#10.

buildout also in early 2017. The proposed warehouse logistic center site would operate 24 hours a day, seven days a week. The proposed Project truck routes include South Central, Rosecrans, McKinley and Wilmington Avenues, Avalon Boulevard, and East 120th Street to access the 110, 105, 91 and 710 freeways.[2] The projected truck traffic would pass by sensitive receptors including single- and multi-family residences, schools (Dickison, Mayo and McKinley Elementary Schools; Davis, Whaley, and Willowbrook Middle Schools; Cesar Chavez High School; and the King-Drew Medical Center. **2-3 cont.**

The Lead Agency analyzed project impacts for both Option A and Option B. Based these analyses, the SCAQMD staff has concerns about the assumptions used to estimate project health affects and air quality impacts since the Lead Agency has determined the analyses showed almost significant residential impacts for cancer risk,[3] mostly from project trucks operating from the project site along nearby residential streets.[4] The SCAQMD staff recommends revising the HRA according to SCAQMD staff comments to better account for potential adverse health affect impacts for workers and residences near the project site and sensitive receptors located along the truck routes.

The SCAQMD staff also has concerns about the modeling assumptions used to estimate project operational, localized and health effect impacts. Specifically, the Lead Agency used the Institute of Transportation Engineers Manual (ITE) 1.68 total vehicle trip rate from the for the High Cube Warehouse land use. Along with using the ITE 1.68 overall vehicle trip rate, the SCAQMD staff recommends using the associated ITE 0.64 daily truck trip rate instead of the non-standard truck rate used in the Draft IS/MND. In addition, the operational trip lengths used in the air quality and related analyses should reflect a conservative, worst-case basis since the future occupants are currently unknown. Finally, the SCAQMD staff recommends that all feasible mitigation measures including a 1,000 foot buffer between the on-site truck activities and nearby sensitive receptors be considered and incorporated into the final Project and Final MND to reduce these impacts. Additional details are included in the attachment. **2-4**

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments. **2-5**

[2] Traffic Impact Analysis Report (Revised November 2014), Hirsch/Green Transportation Consulting, Figure 4(b) Proposed Project Geographic Trip Distribution Percentages (Trucks) and an aerial map inspection.

[3] DMND, Mobile Source (Diesel Truck) Health Risk Assessment for the Proposed Brickyard Commerce Center (Warehouse/Distribution Center), Pomeroy Environmental Services (July 2014), Table 3 Project Health Risk Summary, Page 15: (Central Avenue Residences for a 70-Year Exposure have a Maximum Incremental Cancer Risk [MICR] of 9.16 in 1 million with a threshold of >10 in 1 million).

[4] Ibid, Table 3 – Residences located along Central Avenue (9.16 in 1 million), Sam Littleton Street (8.25 in 1 million) and McKinley Avenue (8.38 in 1 million) Residences. The MICR threshold is >10 in 1 million.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JB:GM

LAC141223-15
Control Number

#10.

Air Quality Analysis – Localized Significance Thresholds (LST) Analysis

Construction

1. In the footnotes in Table 7 (Localized On-Site Peak Daily Construction Emissions), the analysis assumed soil disturbance of four-acres per day and interpolated the thresholds presented in the Draft IS/MND from in the SCAQMD Mass Rate LST Lookup Tables (lookup tables).[5] These lookup tables with the associated thresholds of significance were developed for screening purposes and are not meant to be interpolated. Rather, they are to be used to determine if emissions would require further analyses, i.e., performing project-specific modeling for project emissions if the Lead Agency prefers more precise results. Based on the footnote assumption in Table 7, the air quality analysis should be revised in the Final MND using the more conservative two-acre threshold tables. These thresholds values are lower than the values shown in the five-acre threshold tables. If the Lead Agency chooses, dispersion analysis can also be performed comparing the modeled concentrations with the Ambient Air Quality Standards for Criteria Pollutant Thresholds found at the SCAQMD website.[6] Based on the emission estimates in Table 7 compared with the threshold table values for a two-acre site, Project construction localized emissions exceed the two-acre thresholds of significance for construction NOx, PM10 and PM2.5. 2-6

Operations

2. Based on the two-acre LST lookup table thresholds for operations, the proposed Project localized operational impacts would exceed the threshold of significance for PM10. (See comment in the preceding paragraph). 2-7

Mitigation

3. Mitigation pursuant to CEQA Guidelines §15126.4, §15369.5 should therefore be incorporated into the Final MND both in the final analysis and Project itself. 2-8

Air Quality Analysis - Operations

Daily Truck Trip Rate

4. In the Air Quality Impact Analysis, the Lead Agency uses the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE) 1.68 overall trip generation rate (for cars + trucks) based on ITE Land Use 152, High-Cube 2-9

[5] SCAQMD Website for Mass Rate LST Lookup Tables at:http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 .

[6] SCAQMD website for SCAQMD Air Quality Significance Thresholds at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 .

Warehouse Distribution Center. Using the ITE 1.68 trip rate estimates approximately 2,402 total daily vehicles for Option A and 1,809 total daily vehicles for Option B. Although the ITE 1.68 overall trip rate is used for the proposed Project, the Lead Agency does not use the associated ITE 0.64 daily truck trip rate from this same reference to estimate daily truck trips for either Option A or Option B.[7] Rather, the Trip Generation Rates use a 1.337 passenger car daily trip rate and a 0.343 daily truck trip rate.[8] By using the 0.343 daily truck trip rate, trucks are underestimated for Option A at 515 daily truck trips in the Draft IS/MND instead of approximately 960 daily truck trips using the ITE 0.64 trip rate. For Option B, using ITE 0.64 would yield an estimate of 689 daily truck trips instead of 369 daily truck trips estimated in the Draft IS/MND. Using the non-standard trip rate substantially underestimates project truck operational air quality and health affect impacts. **2-9 cont.**

Absent from an occupant-specific traffic study of known tenants, the Final MND should be consistent and therefore use the associated ITE truck trip rate to estimate project daily truck trips in the air quality and associated analyses. Otherwise, project trips and associated emission and health effect impacts could be substantially underestimated.

On-Road Truck Trip Length

5. In the CalEEMod output sheets provided in Draft IS/MND appendices, the modeling used a 16.6 mile one-way truck trip distance for trucks used by people employed by perspective tenants and an 8.4 one-way trip distance was used by trucks not employed by perspective occupants to estimate operational air quality impacts for trucks moving goods for the proposed facility. The Draft IS/MND did not include, however, information that would substantiate the one-way trip lengths used in the air quality analyses including points of origin, destinations and related distances for goods coming to and leaving the proposed Project site. Absent from an occupant-specific analysis with trip-length information, the SCAQMD staff recommends that all applicable analyses be revised in the Final MND using a one-way trip length that more accurately estimates air quality emission and related impacts based on a more conservative estimate. For example, goods delivered outside of the Basin boundary using the 15 Freeway would travel a one-way distance of approximately 70 miles. If the Lead Agency is therefore uncertain of the types of occupants or the trip lengths, the Lead Agency could alternatively limit activities, as a condition of occupancy, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations and other relative analyses including health affects could be substantially underestimated. **2-10**

[7] ITE Manual, High Cube Warehouse Distribution Center (ITE Land Use – 152), 0.64 weighted average Truck Trip Generation Rate (trip ends per 1,000 square feet of gross floor area), Page 267.
[8] 1.337 + 0.343 = 1.68.

#10.

Health Risk Assessment (HRA) Modeling

6. The Lead Agency used AERMOD (version 11103), which was released on April 13, 2011, to prepare the dispersion modeling for the Health Risk Assessment (HRA). Since then, AERMOD has been updated five times, with the most recent AERMOD (version 14134) released on May 14, 2014. Since the most recent version of AERMOD was available at the time of analysis, SCAQMD staff recommends that the Lead Agency revise the HRA analysis using the latest version of AERMOD (version 14134) to better capture project localized impacts in the Final MND. 2-11

7. The HRA analysis for both the resident and worker receptors involved the use of separate discrete receptors placed randomly. The SCAQMD staff recommends that the Lead Agency revise the HRA using a receptor grid over the existing residences and businesses in order to ensure that the maximum impacts to a residential or worker receptor are properly analyzed and accounted for in the Final MND. 2-12

8. The HRA only included on-site truck emissions and emissions along a short segment of local roads, which likely underestimated the health risks to existing residents in the project vicinity. According to the SCAQMD's Guidance for performing a mobile source health risk assessment (http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis), the emissions from the project trucks along local streets and arterials in transit to and from the facility up to the closest freeway need to be analyzed. The SCAQMD staff therefore recommends that the Lead Agency revise the HRA to include the appropriate local roads so that these potential impacts are adequately analyzed in the Final MND. 2-13

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

Mitigation Directed to Reduce Truck Idling

9. Based on Site Plan A, there will be two gates controlling truck access to Building 1. Although those gates are located in the interior of the project site, the SCAQMD staff is concerned that trucks could queue at those gates while waiting to access Building 1. Because these gates are approximately 200-feet from the nearest residential receptors along both South Central and McKinley Avenues, the SCAQMD staff is concerned about the potential adverse health risks associated with the idling truck emissions while queuing. SCAQMD staff therefore recommends that the Lead Agency provide more details in the Final CEQA document regarding how truck queuing will be avoided. The SCAQMD staff also recommends the following additional mitigation measures to prevent the nearby sensitive receptors from exposure to the project's adverse diesel particulate truck emissions: 2-14

    - Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
    - Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.

- Post signs informing truck drivers about the California Air Resources Board diesel idling regulations and the health effects of diesel particulate matter.
- Post signs on the interior and exterior of the project site near the gates, requiring the following:
  - Truck drivers shall turn off engines when not in use;
  - Trucks shall not idle for more than five minutes;
  - Telephone numbers of the California Air Resources Board to report violations.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.

2-14 cont.

Additional Mitigation Directed to Reduce Mobile Source Emissions

10. In additional to the above measures directed to reduce emissions associated with queuing and on-site truck idling, the Lead Agency may determine that project operation emissions for Volatile Organic Compounds (VOC), Oxides of Nitrogen (NOx), or health affect impacts might be significant, primarily from on-road truck activity emissions. Since the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic, the SCAQMD staff therefore recommends the following additional measures be incorporated into the Final MND to reduce exposure to sensitive receptors from adverse project operational air quality and health affect impacts:

    Additional Mitigation Measures:

    - Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
    - Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.[9]
    - Limit the daily number of trucks allowed at each facility to levels analyzed in the Final MND. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
    - On-site equipment should be alternative fueled.
    - Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.

2-15

[9] CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

#10.

- The Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

  At a minimum, require upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the occupant should also be required to accept and use them.

2-15 cont.

Electric Vehicle (EV) Charging Stations

11. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed facility and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.[10] Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

2-16

CNG Fueling Station

12. Should the proposed project generate significant regional NOx operational impacts after revision, the SCAQMD staff recommends that the project pro-actively take measures that could reduce emissions sooner rather than later. The SCAQMD staff therefore recommends that the Lead Agency ensure the availability of alternative fueling facility (e.g., natural gas) to serve the project site prior to operation of any logistics warehousing within the project area.

2-17

[10] http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

Mitigation Measures for Operational Air Quality Impacts (Other)

13. Should the Lead Agency determine through further analyses that the project's regional operational air quality impacts exceed the SCAQMD recommended threshold of significance for NOx, the SCAQMD staff recommends the following on-site area source mitigation measures be incorporated into the proposed Project and Final CEQA document pursuant to CEQA Guidelines §15126.4, §15369.5.

    - Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
    - Use light colored paving and roofing materials.
    - Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
    - Install light colored "cool" roofs and cool pavements.
    - Limit the use of outdoor lighting to only that needed for safety and security purposes.
    - Require use of electric or alternatively fueled sweepers with HEPA filters.
    - Use of water-based or low VOC cleaning products.

2-18

COMMENT LETTER NO. 3

Kevin T. Johnson
Acting Chief, Forestry Division, Preventive Services Bureau
COUNTY OF LOS ANGELES FIRE DEPARTMENT
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Dated: January 12, 2015

Response to Comment No. 3-1:

This comment contains an introductory statement to the comment letter. In addition, the Planning Division of the County Fire Department notes that the project is not part of the response area for the Los Angeles County Fire Department and would not have an impact on the department's emergency responsibilities. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft IS/MND. The Draft IS notes (page 98) that the Project would be served by the Compton Fire Department.

Response to Comment No. 3-2:

The Land Development Unit provides a comment that states the project is within the City of Compton, which has its own fire department and provides contact information for the Land Development Unit. The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Initial Study/Mitigated Negative Declaration. No response is required.

Response to Comment No. 3-3:

The commenter states the Forestry Division's responsibilities and suggests that potential impacts to erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Zone 4, archaeological and cultural resources, and County Oak Tree Ordinance be addressed. The Project's impacts related to erosion control are addressed in the Draft IS on page 57. Impacts in this regard are identified as Less Than Significant. The Project's impacts related to watershed management are addressed in the Draft IS on pages 75 and 76. Impacts in this regard are identified as Less Than Significant with Mitigation Incorporated. The Project's impacts related to rare and endangered species are addressed in the Draft IS on page 52. No impacts in this regard are identified. The Project's impacts related to vegetation are addressed in the Draft IS on pages 52 and 53. No impacts in this regard are identified. The Project's impacts related to wildland fires are addressed in the Draft IS on page 71. No impacts in this regard are identified, as the Project is not located in any high fire hazard zone or area. The Project's impacts related to archaeological and cultural resources are addressed in the Draft IS on pages 53 through 55. Impacts in this regard are identified as Less Than Significant with Mitigation Incorporated. The Project is located in the City of Compton and is not subject to the provisions of the County Oak Tree Ordinance. The Project's impacts related to conflict with local policies and ordinances protecting biological resources, such as a tree preservation policy or ordinance, are addressed in the Draft IS on page 53. No impacts in this regard are identified.

Response to Comment No. 3-4:

The Health Hazardous Materials Division provided a comment stating that it has no objection to the proposed development. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The Draft IS notes (pages 65 through 70) that the Project site is subject to remediation requirements resulting from past activities on the site that are presently being conducted in accordance with a Remedial Action Program (RAP)

approved by the Health Hazardous Materials Division, Site Mitigation Unit (SMU), and subject to the regulatory oversight of the SMU.

#10.

Comment Letter No. 3

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

January 12, 2015

Robert Delgadillo, Planning Manager
City of Compton
Planning Division
205 S. Willowbrook Avenue
Compton, CA 90220

Dear Mr. Delgadillo:

NOTICE OF INTENT TO ADOPT AN INTIAL STUDY AND MITIGATED NEGATIVE DECLARATION, "BRICKYARD COMMERCE CENTER," ENVIRONMENTAL ASSESSMENT MND NO. 933, IT INVOLVES TWO POTENTIAL SITE PLAN OPTIONS, EACH OF WHICH INCLUDES THE CONSTRUCTION OF MULTIPLE LIGHT INDUSTRIAL/WAREHOUSE/DISTRIBUTION BUILDINGS WITH TRUCK LOADING DOORS, 13633, 13801, AND 13805 CENTRAL AVENUE, COMPTON (FFER 201400242)

The Notice of Intent to Adopt an Initial Study and Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION

3-1

1. The subject property is entirely within the City of Compton which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this department.

LAND DEVELOPMENT UNIT

1. The Land Development Unit does not have any comments for this project since the City of Compton has its own Fire Department.

2. If there are any questions regarding the Land Development Unit's response, please contact FPEA Wally Collins at (323) 890-4243 or at Wally.Collins@fire.lacounty.gov.

3-2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

3-3

HEALTH HAZARDOUS MATERIALS DIVISION

1. The Health Hazardous Materials Division is overseeing assessment and mitigation of the subject property and has no objection to the proposed development.

3-4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

COMMENT LETTER NO. 4

Adriana Raza
Customer Service Specialist, Facilities Planning Department
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY
1955 Workman Mill Road
Whittier, CA 90601-1400

Dated: January 15, 2015

Response to Comment No. 4-1:

The commenter provides information regarding ministerial requirements for the Project's connection to the wastewater conveyance and treatment system operated by the County Sanitation Districts, and information regarding the capacity of infrastructure and treatment facilities serving the Project. The comment further states that the Districts will provide treatment capacity consistent with regional growth forecasts. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The information regarding the capacity of the Districts Joint Water Pollution Control Plant and the projected wastewater generation associated with the Project is consistent with the information provided in the Draft Initial Study on pages 189 and 190. The information provided in the comment regarding the capacity of the Compton Creek Extension Trunk Sewer is acknowledged. This information does not identify any impacts related to this facility. No changes to the Initial Study are required.

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

January 15, 2015

Ref File No.: 3204873

Mr. Robert Delgadillo
Planning and Economic
Development Department
City of Compton
205 South Willowbrook Avenue
Compton, CA 90220

Dear Mr. Delgadillo:

Brickyard Commerce Center

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration for the subject project on December 19, 2014. The proposed development is located within the jurisdictional boundaries of District No. 1. We offer the following comments regarding sewerage service:

1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp.

2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Compton Creek Extension Trunk Sewer Section 1, located in Kalsman Avenue just north of 133rd Steet. This 18-inch diameter trunk sewer has a design capacity of 3.4 million gallons per day (mgd) and conveyed a peak flow of 2.2 mgd when last measured in 2013.

3. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.

4. The expected average wastewater flow from the proposed project, 1.5 million square feet of light industrial and warehouse structures, is 37,500 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4-1

#10.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

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

4-1 cont.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde

for:

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: M. Tremblay
J. Ganz

DOC: #3205084.D01

COMMENT LETTER NO. 5

Grace R. Busby and Concerned Community Persons
1202 E. 139th Street
Compton, CA 90222

Dated: January 21, 2015

Response to Comment No. 5-1:

The commenter questions the issuing the Notice of Intent to Adopt an Initial Study and Mitigated Negative declaration prior to scheduling a public hearing. CEQA Guidelines Section 15072(g) requires that a lead agency provide a notice of intent to adopt a mitigated negative declaration that includes, among other things, the "date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice (emphasis added)." When the Notice of Intent was circulated on December 22, 2014, the public hearing for the Project had not been scheduled, and therefore this information could not have been included in the Notice of Intent. Subsequently, a public hearing before the City Planning Commission was scheduled for February 11, 2015, and the Notice of Intent has been updated and included in the Final IS/MND.

Response to Comment No. 5-2:

The commenter questions the issuing the Notice of Intent to Adopt an Initial Study and Mitigated Negative declaration before giving the public an opportunity to review the reason for the City's intent to adopt the Initial Study and MND. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The comment also raises concern to the length of time provided to review the environmental document and expressed difficulties in obtaining a copy of the document from the Planning Department. The IS/MND was provided for public review in accordance with the requirements of CEQA (CEQA Guidelines Section 15073) for a 30-day period from December 22, 2014 to January 21, 2015. The Notice of Intent included the location where the Initial Study was available for public review, and provided a contact name and phone number at the lead agency where questions could be directed. The City also provided a copy of the Initial Study for review at the Compton Public Library. In addition, a public scoping meeting for the Project was held for the community on May 7, 2014.

Response to Comment No. 5-3:

The commenter questions why an initial study was prepared and a Mitigated Negative Declaration proposed. The commenter also notes that the word mitigate has negative implications and that the MND needs to be explained in detail. The analysis of the potential environmental impacts of the Project and the mitigation measures required to address significant environmental effects associated with construction and operation of the Project is contained in the Draft IS/MND, which was prepared for the Project in accordance with the requirements of CEQA and CEQA Guidelines. This document was circulated as required for public review (see Response to Comment No. 5-2). The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the IS/MND. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project.

Response to Comment No. 5-4:

The commenter notes the number of truck loading doors under each Site Plan options and is concerned about the traffic impacts and the potential noise affecting the community and questions whether a start time in the morning and end time in the evening have been considered for the project. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to

approve the Project. The traffic impacts of the Project are addressed in the Draft IS/MND on pages 102 through 183 for Site Plans A and B, and in the Final IS/MND on pages 225 through 248 for Revised Site Plans A and B, which reduced the Project size from the original 1.5 million square foot Site Plan A Project, and were developed in response to concerns regarding the overall size of the Project and associated impacts. With respect to noise, the Draft IS/MND addressed the potential noise impacts of the Project with respect to trucks entering and leaving the facility and operating on the Project site (Draft IS, pages 89 through 93). This analysis demonstrates that the activity associated with the Project would not exceed the applicable thresholds of significance and therefore no mitigation measures, including limitations on operating hours, are warranted.

Response to Comment No. 5-5:

The commenter expresses the understanding that the Project will be responsible for the condition of the streets surrounding the Project site and raises concerns regarding the streets that approach the site. The comment specifically mentions Central Avenue as being in disrepair and requests that slurry not be used to make repairs. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project. The City has determined that the Project would not result in excessive wear and tear on Central Avenue and thus resurfacing or reconstruction of the street is not required. However, the City of Compton and the County of Los Angeles, Department of Public Works have identified that the Project will be required to widen McKinley Avenue and reconstruct the pavement to the satisfaction of the City and the County Department of Public Works in order to accommodate the truck traffic on McKinley Avenue.

Response to Comment No. 5-6:

The commenter questions if a moratorium is required to obtain answers to the community's questions regarding the Project. The comment is acknowledged and will be considered by the City's decisionmakers in determining whether or not to approve the Project.

Comment Letter No. 5

1/21/2015 **#10.**

TO: Robert Delgadillo, Planning Manager
Planning and Economic Development Department

FROM: Grace R. Busby and Concerned Community Persons

SUBJECT: Notice Of Intent To Adopt An Initial Study And Mitigated Negative Declaration As Well As Other Concerns

There are questions listed below that some neighbors and community persons would like to have answered:

1. Why hasn't a public hearing for Environment Assessment MND No. 933 been scheduled prior to the issuing of the "Notice Of Intent To Adopt an Initial Study and Mitigated Negative Declaration?" **5-1**
2. Why has the Planning and Economic Development issued a "Notice To Adopt an Initial Study and Mitigated Negative Declaration" **before** giving the public an opportunity to peruse, study, and/or investigate why the intent to adopt the initial study and MND has been made? The "Notice..."gave the public one month from December 22 to January 21, 2015 to review and comment on the MND at the end of this period comments were ordered to be submitted to the Planning and Economic Department. It has been difficult to obtain from the Planning Department as well as a copy of this study. **5-2**
3. Why has an initial study of environmental impact been prepared for the Brickyard Commerce Center Project and a Mitigated Negative Declaration proposed? The word mitigate has negative implications and MND needs to be explained in comprehensible detail. **5-3**
4. Site Plan A has 208 truck loading doors; Site Plan B-88; and Building B-3 has 12. With such a large number of trucks entering and exiting the property, the traffic could be horrendous. Has the governing body of Compton and the Planning Department considered whether there will be a start time in the morning and cut-off time in the evening so that community persons can be shielded from the effects of constant and possibly deleterious noise which affect the community negatively? **5-4**
5. We have been told that the Brickyard Project will only be responsible for the condition of the streets surrounding the site. We are concerned about the streets the trucks will use to approach the Brickyard Project. As you know some of the streets of Central Avenue are already in poor disrepair and in great need of repair. Will you please **not** use slurry to make these repairs? This community does not need inadequate repairs to add to our economic problems. **5-5**

Do we need a moratorium to have time to obtain answers to our questions? **5-6**

Thank you Mayor Brown for answers and/or explanations to the above questions.

Yours truly,
Grace R. Busby

Grace R. Busby
and Concerned Community Persons

RECEIVED
JAN 21 REC'D
BY:

Grace R. Busby
1202 E. 139th Street
Compton, CA 90222
323.979.8706 310.763.6692 - FAX

cc: Aja Brown, Mayor
City of Compton

VII. MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM PROCEDURES

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Compton Planning and Economic Development Department is the Lead Agency for Brickyard Commerce Center Project.

An Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Project. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of mitigation measures identified for the Project. The required mitigation measures are listed separately and categorized by impact area, with an accompanying identification of the following:

- Monitoring Phase, the phase of the Project during which the mitigation measure must be monitored;
    - Pre-Construction, including the design phase
    - Construction
    - Post-Construction
- The Implementing Party, the agency with the power to implement the mitigation measure;
- The Enforcement Agency, the agency with the power to enforce the mitigation measure, and
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMRP for the Brickyard Commerce Center Project will be in place throughout all phases of the Project. The Applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The applicant shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to Department of Building and Safety shall be at the discretion of the Department of Building and Safety. Generally, each report will be submitted to the Department of Building and Safety in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The Department of Building and Safety in conjunction with the Applicant shall assure that project construction occurs in accordance with the MMRP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed below are all departments of the City of Compton unless otherwise noted.

I. AESTHETICS

MM AE-1. The construction area shall be screened with appropriate material of sufficient height (e.g., temporary fencing with opaque material) to screen views of the construction site.

Monitoring Phase:	Construction
Implementation Party:	Applicant
Enforcement Agency:	Department of Building and Safety, Public Works Department
Monitoring Agency:	Building and Safety Department

MM AE-2. Construction equipment staging areas shall be located at least 150 feet from the existing parcel's western and northern property line, and the eastern boundary of the flag lot to reduce visual impacts of construction equipment, trailers and materials on the adjacent single family residences located to the west and north of the project site, and the senior housing facility located to the east of the flag lot. Staging locations compliant with this distance requirement shall be identified on the Final Development Plans and Grading Plans.

Monitoring Phase:	Construction, Post-Construction
Implementation Party:	Applicant
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

MM AE-3. The use of highly reflective materials, such as mirrored glass, shall be prohibited. Non-reflective building materials shall be used to the maximum extent possible to reduce potential glare impacts. Building materials shall be identified on the Architectural Plans submitted for plan check for the Planning Division's review and approval.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

MM AE-4. All exterior lighting shall be shielded downward and away from adjoining properties and the public right-of-way. A lighting plan shall be submitted for approval by the City of Compton. This lighting plan shall specify lighting type and placement to ensure lighting does not spill over onto adjoining properties.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Department of Building and Safety, Public Works Department
Monitoring Agency:	Department of Building and Safety

MM AE-5. A construction lighting plan must be submitted before the City issues building permits. Construction lighting must be shielded downward and not shine onto adjoining properties and the public right-of-way.

Monitoring Phase:	Pre-Construction, Construction

Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Public Works Department
Monitoring Agency: Building and Safety Department

MM AE-6. The project driveway on McKinley Avenue shall be aligned with 138th Street, and this driveway and the approach within the Project site shall be striped such that existing vehicles will align with 138th Street, and their headlights shall shine directly down 138th Street until those vehicles have exited the Project site. The design of this driveway and the intersection with McKinley Avenue shall be subject to the review and approval of the City of Compton and Los Angeles County Department of Public Works.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Public Works Department
Monitoring Agency: Building and Safety Department

II. AGRICULTURAL RESOURCES

No mitigation measures are required.

III. AIR QUALITY

MM AQ-1. The project shall utilize paints and solvents with a VOC standard of less than 10 g/L, as identified by the SCAQMD, to the extent required to keep VOC emissions below the SCAQMD threshold of 75 pounds per day. These materials may be used in conjunction with other measures, including adjustments to construction schedules, to achieve this performance standard.

Monitoring Phase: Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

IV. BIOLOGICAL RESOURCES

No mitigation measures are required.

V. CULTURAL RESOURCES

MM CR-1. In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius must be temporarily suspended or redirected until an archaeologist is provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. Construction personnel must be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the archaeologist (as appropriate) must prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfies the requirements of Public Resources Code § 21083.2. The archaeologist must complete a report of excavations and findings, and the report must be submitted and kept on file at the South Central Coastal Information Center. After the find is appropriately mitigated, work in the area may resume.

Monitoring Phase: Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

MM CR-2. In the event that subsurface paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius shall be temporarily suspended or redirected until a paleontologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. Construction personnel shall be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the paleontologist, as appropriate, shall prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfies the requirements of Public Resources Code § 21083.2. The paleontologist shall complete a report of excavations and findings, submit the report to the South Central Coastal Information Center, and keep the report on file at the South Central Coastal Information Center. After the find is processed in accordance with the approved research design, work in the area may resume.

Monitoring Phase: Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

MM CR-3. If human remains are unearthed, all earth-disturbing work shall be temporarily suspended until the County coroner makes the necessary findings as to its origin and disposition pursuant to Public Resources Code §5097.98. If the remains are determined to be of Native American descent, all earth-disturbing work shall be suspended until the Native American Heritage Commission (NAHC) is notified and determines how to proceed with the remains.

Monitoring Phase: Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

VI. GEOLOGY AND SOILS

MM GS-1. Before the City issues building and grading permits, the Chief Building Official of the City Building and Safety Department and the Director of Public Works/Municipal Utilities Department shall review and approve the Geotechnical

Study prepared for the Project. The Project shall be designed and constructed in accordance with the recommendations provided in the Geotechnical Study and such additional changes that may be implemented by the Chief Building Official and Director of Public Works/Municipal Utilities.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

VII. GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

VIII. HAZARDS AND HAZARDOUS MATERIALS

No mitigation measures are required.

IX. HYDROLOGY AND WATER QUALITY

MM HY-1. The Project shall implement the following SWPPP BMPs:

- During construction and operation, all waste shall be disposed of in accordance with all applicable laws and regulations. Properly labeled recycling bins shall be utilized for recyclable construction materials including solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials and wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed, regulated disposal site by a licensed waste hauler.
- All leaks, drips and spills occurring during construction shall be cleaned up promptly and in compliance with all applicable laws and regulations to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- If materials spills occur, they should not be hosed down. Dry cleaning methods shall be employed whenever possible.
- Construction dumpsters shall be covered with tarps or plastic sheeting if left uncovered for extended periods. All dumpsters shall be well maintained.
- The project applicant/developer shall conduct street sweeping and truck wheel cleaning to prevent dirt in storm water.
- The project owner/developer shall provide regular sweeping of private streets and parking lots with equipment designed for removal of hydrocarbon compounds.
- The amount of exposed soil shall be limited and erosion control procedures implemented for those areas that must be exposed.
- Grading activities shall be phased so that graded areas are landscaped or otherwise covered, as quickly as possible after completion of activities.
- Appropriate dust suppression techniques, such as watering or tarping, shall be used in areas that must be exposed.
- Sandbags shall be placed at the perimeter of the construction area to control off-site migration of pollutants.

- Construction entrances shall be designed to facilitate removal of debris from vehicles exiting the site, by passive means such as paved/graveled roadbeds, and/or by active means such as truck washing facilities.
- Simple sediment filters, basins, or traps shall be constructed at or near the entrances to the storm drainage system wherever feasible

Monitoring Phase: Construction, Post-Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Public Works Department
Monitoring Agency: Building and Safety Department, Public Works Department

MM HY-2. Prior to the issuance of any grading permit, the Applicant shall submit a Standard Urban Stormwater Mitigation Plan (SUSMP) for review and approval by the City of Public Works/Municipal Utilities Department.

Monitoring Phase: Pre-Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency: Building and Safety Department, Public Works Department

MM HY-3. The Applicant shall maintain all structural or treatment control BMPs identified in the SUSMP for the life of the project.

Monitoring Phase: Post-Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency: Building and Safety Department, Public Works Department

MM HY-4. Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, without limitation, a cabinet, shed, or similar sheltered enclosure; or (2) protected by secondary containment structures such as berms, dikes, or curbs. The enclosures and/or secondary containment structures that would be used shall be approved by the Director of Public Works/Municipal Utilities.

Monitoring Phase: Construction, Post-Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency: Building and Safety Department, Public Works Department

MM HY-5. The Applicant shall obtain a connection permit to the storm drain system from LACFCD based upon a hydrology report and storm drain plan approved by LACFCD artment.

Monitoring Phase:	Pre-Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department, Los Angeles County Fire Department
Monitoring Agency:	Building and Safety Department, Los Angeles County Fire Department

X. LAND USE AND PLANNING

No mitigation measures are required.

XI. MINERAL RESOURCES

No mitigation measures are required.

XII. NOISE

MM NOI-1. Construction activities shall be scheduled so as to operate only the necessary construction equipment at any given time, in order to control noise levels.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department
Monitoring Agency:	Building and Safety Department

MM NOI-2. The applicant or project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department
Monitoring Agency:	Building and Safety Department

MM NOI-3. Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling, staging) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, in order to minimize the propagation of noise from such activities towards these land uses.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department
Monitoring Agency:	Building and Safety Department

MM NOI-4. Solid barriers such as, but not limited to, plywood structures or flexible sound control curtains shall be erected around the western and northern perimeters of the construction site adjacent to residential neighborhoods to minimize the amount of noise during construction on the nearby noise-sensitive uses. Barriers shall be of sufficient height to block the line of sight between the Project site and the adjacent sensitive receptors and shall be capable of reducing noise levels between the source and the receptor by at least 5 dBA.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

MM NOI-5. The Project shall provide a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed at all project site entrances in a location that is readily visible to the public. In addition, a notice containing this information shall be provided by mail to all residents located within 250 feet of the Project site. Complaints shall be responded to within a reasonable time frame (i.e., ordinarily within 24 hours; however, additional response time may be required for complex or other unusual circumstances).

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

MM NOI-6. *The 12-foot high screenwalls provided along McKinley Avenue and Sam Littleton Street shall be designed and constructed to reduce noise levels across the barrier by at least 10 dBA. The design of the walls shall be reviewed by the City of Compton Building Department to verify this level of sound reduction*.

Monitoring Phase: Pre-Construction, Construction, Post-Construction
Implementation Party: Applicant
Enforcement Agency: Building and Safety Department
Monitoring Agency: Building and Safety Department

XIII. POPULATION AND HOUSING

No mitigation measures are required.

XIV. PUBLIC SERVICES

MM PS-1. Before building permits are issued, the applicant shall consult with LASD on design features and security plans that would potentially minimize increased demand for police protection services.

Monitoring Phase:	Pre-Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department, Los Angeles Sherriff Department
Monitoring Agency:	Building and Safety Department, Los Angeles Sherriff Department

MM PS-2. Before building permits are issued, the applicant shall pay the required School Fees. This condition does not limit the applicant's ability to appeal or protest the payment of these fees to the school districts(s).

Monitoring Phase:	Pre-Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department
Monitoring Agency:	Building and Safety Department

XV. RECREATION

No mitigation measures are required.

XVI. TRANSPORTATION/TRAFFIC

Note: Mitigation Measures TR-1 through TR-6 were applicable only to the original Site Plan A and Site Plan B Projects and not the Revised Site Plan A and Site Plan B Projects.

MM TR-7. The Project Applicant shall work with the City of Compton, Los Angeles County Department of Public Works, and Metro to identify an appropriate new location and design for the relocated bus stop on Rosecrans Avenue. Relocation of the bus stop shall be the responsibility of the Project Applicant, including all design, construction, and installation costs.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department, County of Los Angeles Public Works Department, Metro
Monitoring Agency:	Building and Safety Department, County of Los Angeles Public Works Department, Metro

Mitigation Measures MM-TR-8 through MM-TR-11 would address cumulative impacts at the affected intersections that would result from the Revised Site Plan A and Revised Site Plan B projects. The Revised Site Plan A and Revised Site Plan B projects, by themselves, would not result in significant impacts at these intersections.

The need to upgrade/replace signal hardware will be determined, on a case-by-case basis for each intersection mitigation improvement, by the appropriate reviewing agency (City of Compton, County, or other jurisdiction) during the preparation of the construction and signal modification plans for those improvements.

MM TR-8. Rosecrans Avenue and Avalon Boulevard – The northbound approach of Avalon Boulevard at Rosecrans Avenue shall be restriped within the existing roadway width to install a new right-turn only lane, in addition to the existing single left-turn lane and two through lanes. This improvement will require that the northbound through lanes on Avalon Boulevard be narrowed slightly from their existing widths (although still providing an acceptable 10-foot width), although no substantial modifications to the northbound lane alignments are necessary. The northbound approach of Avalon Boulevard at this intersection also exhibits an existing bus stop, and as such, signage shall be installed to indicate that buses using the proposed new right-turn lane to access the bus stop will be exempted from the required right turn. The proposed mitigation measure will also include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing). The existing traffic signal at this intersection currently provides exclusive left-turn phasing for east-west travel (Rosecrans Avenue approaches), and the installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase, to further improve the operations of this intersection.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department, County of Los Angeles Public Works Department
Monitoring Agency:	Public Works Department, County of Los Angeles Public Works Department, Building and Safety Department

MM TR-9. Rosecrans Avenue and Central Avenue – The potential cumulative impact at this location is also anticipated to occur with the development of either the Revised Site Plan A or Revised Site Plan B projects, although to different degrees.

Revised Site Plan A

In order to address the impacts associated with the Revised Site Plan A project, which are expected during both the AM and PM peak hours, the northbound approach of Central Avenue at this intersection shall be restriped to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes, while the southbound approach of Central Avenue shall be modified to convert the existing right-turn only lane to a shared through/right-turn lane, in addition to the two through lanes and one left-turn lane that currently exist on this approach. The southbound "receiving" lanes of Central Avenue, south of Rosecrans Avenue, will also be modified to install a new "drop lane" for the new southbound

shared through/right-turn lane (extending to approximately 144th Street), which will require the removal of a total of approximately 10 unmetered and unstriped on-street parking spaces along the west side of the street. However, these on-street parking spaces are located adjacent to an existing fast food restaurant (McDonalds) and retail strip mall, both of which provide substantial off-street parking for their patrons and employees, and as such, the removal of the on-street parking is not expected to result in any significant secondary impacts.

The recommended improvements at this location will also require that the eastern curb line of Central Avenue be widened slightly (variable widening up to approximately two feet) to provide consistent lane widths for northbound travel and to align the northbound approach lanes with the "receiving" lanes on Central Avenue north of Rosecrans Avenue, although these minor roadway widenings can be implemented within the existing rights-of-way on the east side of Central Avenue without significantly reducing the existing sidewalk widths or requiring relocation of the existing bus stop on this approach, although new signage should also be included as part of this improvement to indicate that buses using the proposed new right-turn lane to access the bus stop will be exempted from the required right turn. The improvement will also modify the existing bicycle lanes on both the east and west sides of Central Avenue in order to accommodate the proposed new northbound right-turn only lane and new southbound "drop lane" (while adhering to standard design criteria for intersection approaches exhibiting both bicycle and right-turn lanes or "drop lanes"), although no significant "secondary" bicycle facility impacts are expected. Finally, these recommended intersection improvements will also include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing); the existing traffic signal at this intersection currently provides exclusive left-turn phasing for eastbound-westbound travel, and the installation of the new northbound right-turn only lane shall include an "overlap" phase with the westbound left-turn phase, further improving the operations of this intersection.

Revised Site Plan B

The Revised Site Plan B project also results in a significant cumulative impact at this location, although the Revised Site Plan B project impact is expected to occur only during the PM peak hour, due to a slightly different site access configuration and resulting changes to the Revised Site Plan B project traffic patterns travelling through this intersection compared to the Revised Site Plan A project. As such, the Revised Site Plan B project cumulative mitigation is not as extensive, and includes only the implementation of the new northbound right-turn only lane (and its associated roadway widening and northbound "overlap" signal phase), in addition to any necessary traffic signal modifications and/or improvements. The modification to convert the existing southbound right-turn only lane to a shared through/right-turn lane described above for the Revised Site Plan A project mitigation improvement, which is necessary to address the Revised Site Plan A project's AM peak hour impact at this intersection, is not necessary for the Revised Site Plan B project.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Public Works Department, County of Los Angeles Public Works Department
Monitoring Agency: Public Works Department, County of Los Angeles Public Works Department, Building and Safety Department

MM TR-10. Rosecrans Avenue and Wilmington Avenue – To address the potential cumulative impacts at this location, which are again expected to occur with either the Revised Site Plan A or Revised Site Plan B project, the northbound approach of Wilmington Avenue shall be restriped to provide a new right-turn only lane, in addition to one left-turn lane and two through lanes. The northbound approach of Wilmington Avenue currently exhibits an approximately 24 foot wide curb lane, which shall be modified to provide the proposed right-turn only lane along with a through lane, and as such, this proposed measure can be implemented within the existing roadway width of Wilmington Avenue without the need for street widenings or additional rights-of-way. There are currently no bicycle lanes present on this segment of Wilmington Avenue, although an existing bus stop is located on the northbound approach of the street just south of Rosecrans Avenue, and as such, new signage shall be installed indicating that buses using the proposed new right-turn lane to access this bus stop are exempt from the required right turn. This measure shall include any necessary improvements to the traffic signal hardware (relocation of detector loops, new signal heads) and software (signal timing, signal phasing), including the recommended implementation of a new "overlap" phase for the new northbound right-turn lane occurring concurrently with the existing westbound left-turn phase for Rosecrans Avenue traffic..

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Public Works Department, County of Los Angeles Public Works Department
Monitoring Agency: Public Works Department, County of Los Angeles Public Works Department, Building and Safety Department

MM-TR-11. The City shall either establish a fair share program to collect payments from other development projects that also contribute to cumulative impacts at the affected intersections identified in Mitigation Measures **MM-TR-8** through **MM-TR-10**, and/or reimburse the Project Applicant for costs in excess of their fair share that may be incurred in implementing these improvements. The fair share contribution for the proposed Project is anticipated to range from approximately 12 to 55 percent of the total costs of the various improvements, depending on the Project plan (Site Plan A or Site Plan B) and the location of the proposed improvement, including the two projects within the City of Compton and adjacent to the site of the proposed Brickyard Commerce Center project. Such payments would be used to implement some or all of the three cumulative impact mitigation measures identified as appropriate, and/or to reimburse the Brickyard Commerce Center project applicant for any costs in excess of their required "fair share" contributions that may be incurred in implementing the recommended improvements. The actual costs of implementing Mitigation Measures **MM-TR-8**

through **MM-TR-10** and the associated fair share contributions applicable to the Revised Site Plan A and Revised Site Plan B projects shall be determined after review of the improvements and preparation of details plans and costs estimates for each measure. In the interest of ensuring that these intersection improvements are fully implemented as soon as possible, no later than issuance of the Certificate of Occupancy for the Project, the Project Applicant shall fund the balance of the cost of these improvements (beyond the required fair share contribution) and fully implement the recommended measures as a public benefit through the Project's Development Agreement.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department, County of Los Angeles Public Works Department
Monitoring Agency:	Public Works Department, County of Los Angeles Public Works Department, Building and Safety Department

XVII. UTILITIES AND SERVICE SYSTEMS

MM UT-1. Construction debris shall be salvaged and recycled to the maximum extent feasible.

Monitoring Phase:	Construction
Implementation Party:	Applicant
Enforcement Agency:	Building and Safety Department
Monitoring Agency:	Building and Safety Department

RESOLUTION SIGN-OFF FORM

DEPARTMENT: **Planning**

RESOLUTION TITLE: **AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF COMPTON AMENDING CHAPTER 30 (ZONING CODE) OF THE COMPTON MUNICIPAL CODE BY DELETING SECTION 30-21.11.C AND ADDING SECTION 30-21.12 TO ESTABLISH REGULATIONS FOR A MODIFIED PARKING REQUIREMENT (First Reading)**

Robert Delgadillo — **1/21/2015 8:12:48 AM**
DEPARTMENT MANAGER'S SIGNATURE — DATE

REVIEW / APPROVAL

Ruth Rugley — **2/9/2015 5:49:13 PM**
CITY ATTORNEY — DATE

Stephen Ajobiewe — **1/22/2015 4:42:59 PM**
CITY CONTROLLER — DATE

Johnny Ford — **1/21/2015 11:06:24 PM**
CITY MANAGER — DATE

Use when:	
Public Works:	When contracting for Engineering Services.
City Attorney:	When contracting for legal services; contracts that require City Attorney's review.
Controller/Budget Officer:	Amending Budget; appropriating and/or transferring funds; adding and/or deleting positions; any resolution having account numbers.
Asst. City Manager/OAS:	All personnel actions.