

# CHAPTER 4 Environmental Analysis

## 4.0 INTRODUCTION TO THE ANALYSIS

This chapter of the project environmental impact report (EIR) presents an analysis of environmental factors that may be directly or indirectly affected by the Palm/Industrial Distribution Center Project (proposed project). This chapter describes comments received during the scoping period and how they have been incorporated into the EIR, defines the scope of the EIR pursuant to the California Environmental Quality Act of 1970 (CEQA) Guidelines, and outlines the organizational content of the EIR.

### 4.0.1 Comments Received on the Notice of Preparation

During the 30-day public review period for the notice of preparation (NOP), which began on August 3, 2007, and ended on September 4, 2007, four comment letters were received. These include letters from: South Coast Air Quality Management District (SCAQMD), Public Utilities Commission, Department of Toxic Substances Control (DTSC), and Native American Heritage Commission (NAHC). A scoping meeting was held on August 15, 2007, and no members of the public attended. The NOP and comment letters are included in Appendix A (Notice of Preparation and Responses to the NOP) of this EIR.

### 4.0.2 Scope of the EIR

#### ■ CEQA Methodological Requirements

Section 15151 of the CEQA Guidelines describes standards for the preparation of an adequate EIR. Specifically, the standards under Section 15151 are listed below.

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes into account environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive; rather, the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

In practice, the above points indicate that EIR preparers should adopt a reasonable methodology upon which to estimate impacts. This approach means making reasonable assumptions using the best information available. In some cases, typically when information is limited or where there are possible variations in project characteristics, EIR preparers will employ a reasonable “worst-expected-case

analysis” in order to capture the largest expected potential change from existing baseline conditions that may result from implementation of a proposed project.

### 4.0.3 Format of the Environmental Analysis

Each environmental resource section of this chapter (Chapter 4) contains the following headings and related discussions.

An EIR must describe the physical conditions and environmental resources within the project site and in the project vicinity, and evaluate all potential effects on those physical conditions and resources (see CEQA Guidelines Section 15125):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

Furthermore, CEQA Guidelines Section 15126.2(a) explains that:

In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

The project site was reported to have been vacant until the construction Camp Ono, a U.S. Army installation that operated during World War II. Camp Ono served multiple purposes, including as a depot, manufacturing facility, munitions storage, and prisoner of war camp. The project site itself was reportedly used for tent manufacturing. The environmental setting used for purposes of this EIR considers the current state of the property as a baseline for comparison of new conditions that would result from implementation of the proposed project, including, but not necessarily limited to: increased vehicle trip generation (and related noise and air quality impacts), demand for services and utilities, a change in the visual quality or character of the area, and other potential environmental effects. As measured against the existing environmental setting, impacts from the proposed project include the net new effects of development, as well as the temporary impacts associated with construction activities.

### ■ Environmental Setting

According to Section 15125 of the CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project to provide the “baseline condition” against which project-related impacts are compared. The baseline condition is generally the physical condition that exists when the NOP is published. For purposes of this EIR analysis, the baseline condition, if determined by the month of issuance of the NOP, would be August 2007. However, because of the delay in publication of this Draft EIR, baseline conditions were updated to reflect conditions existing in September 2010, the date of recommencement of preparation of the public review Draft EIR. The exception to this baseline is the analysis for Traffic, which utilizes 2007 traffic counts.

Updated traffic counts were taken in September 2010, which showed a reduction in traffic volumes compared to the data collected in May 2007. This may be an artificial reflection of the downturn in the economy, and traffic may return to “normal” conditions upon economic improvement. In any event, for purposes of providing the most conservative analysis, the data from 2007 are used as the baseline for an analysis of project impacts. It should also be noted that for cumulative conditions, the estimates for the 2030 condition provided in the December 2007 traffic study are higher than the volumes calculated in the SANBAG study (see Appendix L2), providing further evidence that the December 2007 traffic study represents a more conservative analysis for CEQA purposes.

## ■ Regulatory Framework

The Regulatory Framework provides a summary of regulations, plans, policies, and laws that are relevant to each environmental issue area. The City’s General Plan goals and strategies are listed in the individual technical sections (Sections 4.1 through 4.14) only if they are used in determining the level of significance of an environmental impact.

## ■ Project Impacts and Mitigation Measures

This section is further divided into the following subsections, as described below.

### ***Analytic Method***

This subsection identifies the methodology used to analyze potential environmental impacts.

### ***Thresholds of Significance***

Thresholds of significance are criteria used to determine whether potential environmental effects are significant. The thresholds of significance used in this EIR are primarily based upon Appendix G of the 2011 CEQA Guidelines. This subsection defines the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment. Some thresholds (such as air quality, traffic, and noise) are quantitative, while others, such as visual quality, are qualitative. The thresholds are intended to assist the reader in understanding how and why the EIR reaches a conclusion that an impact is significant or less than significant.

Thresholds of significance are provided both in the “Thresholds of Significance” section and immediately before the relevant impact analysis for ease of correlation.

### ***Effects Not Found to Be Significant***

Certain impacts are determined to be “Effects Not Found to Be Significant” under Section 15128 of the CEQA Guidelines. This section of the CEQA Guidelines requires that an EIR contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, were not discussed in detail in the EIR.

## Impacts and Mitigation Measures

This subsection describes the potential environmental impacts of the proposed project and, based on the thresholds of significance, determines whether the environmental impacts would be considered significant or less than significant. Each impact is summarized in an “impact statement” that is separately numbered, followed by a more detailed discussion of the potential impacts and the significance of each impact before mitigation. This format is designed to assist the reader in quickly identifying the subject of the impact analyses, as well as for use in Table 2-1 (Summary of Environmental Effects and Project Requirements/Mitigation Measures), which forms the basis of the Mitigation Monitoring and Reporting Program (MMRP). Impact numbers and statements are not provided for “Effects Not Found to Be Significant.” This subsection also discusses feasible mitigation measures (MMs) that may be implemented to reduce significant environmental impacts.

The MMRP for the proposed project, which includes the MMs, obligates the City to monitor implementation of the MMs. The MMRP would be reviewed by the City in conjunction with their consideration of the proposed project and certification of the Final EIR. Following the description of MMs, the subsection concludes with a statement regarding whether the impact, after implementation of the MMs and/or compliance with existing local, state, and federal laws and regulations would remain significant or be reduced to a less-than-significant level.

The EIR uses the following terms to describe the level of significance of impacts identified during the course of the environmental analysis:

- **Significant and Unavoidable Impact (SU)**—Impact that exceeds the defined threshold(s) of significance and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and/or PRs and/or implementation of feasible mitigation measures.
- **Potentially Significant Impact (PS)**—Impact that exceeds the defined threshold(s) of significance, but either can be eliminated to a less-than-significant level through implementation of feasible mitigation measures or, where no feasible mitigation measures exist, the impact would be significant and unavoidable.
- **Less-Than-Significant Impact (LTS)**—Impact that does not exceed the defined threshold(s) of significance or can be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and/or PRs and/or implementation of feasible mitigation measures.

A “significant effect” is defined by Section 15382 of the CEQA Guidelines as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment ... [but] may be considered in determining whether the physical change is significant.”

The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the proposed project. As required by Section 15126.2(a) of the CEQA Guidelines, direct, indirect, short-term, long-term, on-site, and/or off-site impacts are addressed, as

appropriate, for each environmental issue analyzed. It is the physical properties (including location) of this development proposal that could result in effects to environmental resources; consequently, the analysis focuses on the proposed physical properties of development, rather than the policy framework that is designed to facilitate the development.

The primary focus of the analysis is the physical development that is proposed.

## ■ Cumulative Impacts

A cumulative impact analysis is only provided for those thresholds that result in a less-than-significant or significant and unavoidable impact. A cumulative impact analysis is not provided for effects found not to be significant, which result in no project-related impacts.

CEQA requires that an EIR discuss cumulative impacts to determine whether they are significant. If the cumulative impact is significant, or if the project impact is significant, the project's incremental effect must be analyzed to determine if the effects are cumulatively considerable. According to Section 15065(a)(3) of the CEQA Guidelines, this determination is based on an assessment of the project's incremental effects viewed in combination with the effects of past, current, and probable future projects. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion is guided by the standards of practicality and reasonableness.

A significant cumulative impact does not necessarily mean that the project-related contribution to that impact is also significant. Instead, under CEQA, a project-related contribution to a significant cumulative impact is only significant if the contribution is cumulatively considerable.

The geographic scope of the cumulative impact analysis varies depending upon the specific environmental issue area being analyzed. In addition to describing the geographic scope of analysis, where appropriate, each section designates the cumulative context within the designated geographic area. The cumulative context could be a list of past, present, and probable future projects producing related or cumulative impacts and/or a summary of projections contained in one (or more) adopted general plans or related planning documents designed to evaluate regional or area-wide conditions.

## ■ References

This section includes, but is not limited to, those sources relied upon for each environmental topic area analyzed in this document (Sections 4.1 through 4.13), as well as other sections of the EIR. Reference materials also include the appendices to this EIR.

