CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

MITIGATED NEGATIVE DECLARATION

Bridge Point South Bay VII

Case Number: ENV-2020-5488-MND

Project Location: 1351, 1355, and 1361 West Sepulveda Boulevard, Los Angeles, California, 90501

Community Plan Area: Harbor Gateway

Council District: 15 – Buscaino

Project Description:

The Bridge Point South Bay VII Project proposes to redevelop a 7.36 net acre site with a 174,211 square foot warehouse building, with 163 parking spaces and landscape improvements. The building would be a single level with mezzanine and would reach a maximum height of 44 feet. The building would include 164,567 square feet of warehouse space and 9,644 square feet of ancillary office space, with a floor area ratio (FAR) of 0.543:1. The project will involve approximately 52,179 cubic yards of earthwork, with 10 cubic yards of imported soil materials, removal of 141 existing on-site trees, and reabandonment of three (3) oil wells. This project would remove and replace former/inactive land uses, including the Mulligan Family Fun Center and a concrete batch plant. Requested entitlements from the City of Los Angeles include a Site Plan Review, pursuant to L.A.M.C Section 16.05, along with any other necessary actions such as tree removal, demolition, grading, excavation, and building permits. Required approvals from other agencies include a N.P.D.E.S. General Construction Permit from the Los Angeles Regional Water Quality Control Board, and an Oil Well Reabandonment Permit from the California Department of Conservation, Geologic Energy Management Division.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	Michael Baker International	Bridge 1355 Sepulveda, LLC

DATE PREPARED:

March 2021

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

An application for the proposed Bridge Point South Bay VII Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.) as implemented by the City of Los Angeles ("City"). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project, with the incorporation of appropriate mitigation measures, will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Bridge Point South Bay VII**
ENVIRONMENTAL CASE NO.	ENV-2020-5488-EAF
RELATED CASES	DIR-2020-5486-SPR

PROJECT LOCATION	**1351, 1355, and 1361 West Sepulveda Boulevard**
COMMUNITY PLAN AREA	Harbor Gateway
GENERAL PLAN DESIGNATION	Light Manufacturing and Heavy Manufacturing
ZONING	M2-1VL, M3-1VL, MR2-1VL
COUNCIL DISTRICT	15 – Buscaino

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Connie Chauv
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APPLICANT	Bridge 1355 Sepulveda, LLC
ADDRESS	11100 Santa Monica Boulevard, Suite 700 Los Angeles, CA 90025
PHONE NUMBER	Representative: Heather Crossner, 213-425-2309

2.1 PROJECT DESCRIPTION

The Bridge Point South Bay VII Project proposes to redevelop a 7.36 net acre site with a 174,211 square foot warehouse building, with 163 parking spaces and landscape improvements. The building would be a single level with mezzanine and would reach a maximum height of 44 feet, below the maximum permitted 45 foot height. The building would include 164,567 square feet of warehouse space and 9,644 square feet of ancillary office space. This represents a floor area ratio (FAR) of 0.543:1, below the maximum FAR of 1.5:1. There would be a total of 21 dock high doors for trucks on the west side of the building, adjacent to existing industrial uses. The proposed project's warehouse building may be used for either standard warehousing or last-mile delivery and would not be designed or operated as a cold storage facility or high cube warehouse. The project includes the demolition of existing site improvements associated with a former amusement center and concrete batch plant. Site preparation would include approximately 52,179 cubic yards of earthwork, with 10 cubic yards of imported soil materials. While up to 141 existing trees on-site would need to be removed to grade the site, and replaced with 111 new trees, good faith efforts would be made to preserve 10 existing on-site trees within the project's proposed landscape areas. Preservation will depend on the health of the trees, location of their root systems, and construction/grading constraints of development activities. No protected trees would be removed. Three former oil wells beneath the footprint of the proposed warehouse building would be re-abandoned under the oversight of the California Geologic Energy Management Division ("CalGEM").

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The project site is located in the City of Los Angeles at the southern edge of the City's Harbor Gateway Community Plan area at 1351, 1355, and 1361 West Sepulveda Boulevard, roughly mid-way between Western Avenue (SR 213) and Normandie Avenue. It is located on the northern side of Sepulveda Boulevard.

The site is 7.36 net acres and includes the former Mulligan Family Fun Center and a former concrete batch plant. The site is comprised of three parcels, which are all zoned industrial and designated for industrial uses under the General Plan. It is located within a fully urbanized area, with a complete street and utility network, sidewalks, overhead power lines, and a mixture of land uses. Industrial zones are located to the west, north, and southeast of the project site. Sepulveda Boulevard runs along the south of the project site, which is a major east-west street, with six lanes, designated a Boulevard II roadway. Directly across Sepulveda Boulevard from the project site is an oil well facility. To the east and west of this oil well facility are the rear lots of single-family homes. Immediately to the east of the project site is a 6-story multi-family residential development. Also located to the east of the project site are developed commercial sites containing food services and retail businesses.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED
(e.g. permits, financing approval, or participation agreement)

- Los Angeles Regional Water Quality Control Board – National Pollutant Discharge Elimination System Construction General Permit
- California Department of Conservation, Geologic Energy Management Division (CalGEM) – Oil Well Reabandonment Permit

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below 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
- ☐ Agriculture & Forestry Resources
- ☒ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☒ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ 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 on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially 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 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 adequately 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.

CONNIE CHAUV	CITY PLANNER
PRINTED NAME	**TITLE**
Connie Chauv	4/8/2021
SIGNATURE	**DATE**

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 that 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: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than 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 "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must 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 sources 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 whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Bridge Point South Bay VII Project proposes to redevelop a 7.36 net acre site with a 174,211 square foot warehouse building, with 163 parking spaces for passenger vehicles and landscape improvements. The building would reach a maximum height of 44 feet in one level with mezzanine and would include 164,567 square feet of warehouse space and 9,644 square feet of ancillary office space. This represents a floor area ratio (FAR) of 0.543:1, below the maximum FAR of 1.5:1. The office space would be located within 4,686 square feet of ground level and 4,958 square feet of mezzanine space. A total of 21 dock high doors for trucks would be located on the west side of the building adjacent to existing industrial uses. The proposed project's warehouse building may be used for either standard warehousing or last-mile delivery and would not be designed or operated as a cold storage facility or high cube warehouse. The project includes the demolition of existing site improvements associated with a former amusement center and concrete batch plant. Site preparation would include approximately 52,179 cubic yards of earthwork, with 10 cubic yards of imported soil materials. While up to 141 existing trees on-site would need to be removed to grade the site, and replaced with 111 new trees, good faith efforts would be made to preserve 10 existing on-site trees within the project's proposed landscape areas. Preservation will depend on the health of the trees, location of their root systems, and construction/grading constraints of development activities. No protected trees would be removed. Three former oil wells beneath the footprint of the proposed warehouse building would be re-abandoned under the oversight of the California Geologic Energy Management Division ("CalGEM").

Requested entitlements include a Site Plan Review, pursuant to L.A.M.C Section 16.05, along with any other necessary actions such as tree removal, demolition, grading, excavation, and building permits. No street trees are proposed for removal, and there are no protected trees on-site.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The project site is located in the City of Los Angeles, in Southern California, as shown in Figure 1 – Regional Location Map. It is at the southern edge of the City's Harbor Gateway Community Plan Area, at 1351, 1355, and 1361 West Sepulveda Boulevard, roughly mid-way between Western Avenue (SR 213) and Normandie Avenue. It is on the northern side of Sepulveda Boulevard, as shown in Figure 2 – Project Vicinity Map. The project site has 511 feet of frontage along Sepulveda Boulevard, with a depth ranging from 490 feet on the western side to 674 feet on the eastern side. Views along this segment of Sepulveda Boulevard are provided in Figure 3.

The site is identified as a State Enterprise Zone for the Harbor Gateway Area and is subject to Construction Site Review by the State Department of Conservation, Division of Oil, Gas and Geothermal Resources (now "CalGEM") due to the presence of abandoned oil wells on-site.

3.2.2 Existing Conditions

With a total net land area of 7.36 acres (7.6 acres before required dedications), the relatively flat project site consists of three land parcels, formerly occupied by the Mulligan Family Fun Center, a commercial recreation facility with a miniature golf course, arcade building and a motorized cart course, and separately includes a former concrete batch plant (not part of the Fun Center). The closed Mulligan Family Fun Center and surface parking lot surrounds an enclosed concrete batch plant structure, which is a remnant of a former/closed business on a separate parcel within the project site. Over the last hundred years, portions of the site have supported a variety of land uses, including oil production, residential, industrial, concrete distribution, office space and the Mulligan Family Fun Center. Six oil wells were installed between 1924 and 1925. Five of the six wells were abandoned and plugged by 1930 and the last oil well was abandoned and plugged in 1965, which was the end of their oil production use.

All three parcels are zoned industrial and designated for industrial uses under the General Plan.

The largest parcel (APN 7347-018-078/1351 Sepulveda) that is a horseshoe shape, covering 5.01 acres, is designated in the City's General Plan Land Use Map as Light Manufacturing and Heavy Manufacturing, and in the Harbor Gateway Community Plan as Light Industrial. It is zoned M2-1VL (Light Industrial, Height District 1VL) and M3-1VL (Heavy Industrial, Height District 1VL).

The smallest parcel (APN 7347-018-003/1361 Sepulveda), covering 0.8 acres, is designated in the City's General Plan Land Use Map as Light Manufacturing and in the Community Plan as Light Industrial. It is zoned MR2-1VL (Restricted Light Industrial, Height District 1VL).

The eastern parcel (APN 7347-018-085/No address), covering 1.58 acres, is also designated in the General Plan Land Use Map as Heavy Manufacturing and in the Community Plan as Heavy Industrial, and is zoned M3-1VL (Heavy Industrial, Height District 1VL). Buildings and structures in Height District 1VL are limited to a maximum height of 45 feet, with further restrictions depending on proximity to residential land uses.

Views of the project site along the Sepulveda Boulevard frontage are shown in Figure 4.

3.2.3 Surrounding Land Uses

The project site is located within a fully urbanized area, with a complete street and utility network, sidewalks, overhead power lines and a mixture of land uses. Sepulveda Boulevard, which borders the southern edge of the site, is a major east-west street, with six lanes, designated a Boulevard II roadway. A bus stop for Torrance Transit Line 7 is

located along the site frontage. Other major streets in this area include Western Avenue (SR 213), a four-lane road running north/south to the west, and Normandie Avenue, a four-lane road, running north/south, located to the east. Industrial uses are adjacent to the north and west. The site is also located within the Torrance oilfield, a City-designated methane hazard zone.

The project is located within an industrial area that is surrounded to the west and north by industrial zones, and to the southeast by industrial zones. The property is bordered to the south by Sepulveda Avenue, a Boulevard II roadway, and to the south of Sepulveda Boulevard directly across from the site is an oil well facility in the R1-1XL-O zone. To the east and west of the oil well facility along Sepulveda Boulevard are the rear lots of single-family homes in the R1-1XL-O zone. Immediately east of the subject site is a property that is zoned (T)(Q)C2-2D zone, which was rezoned from M3-1VL to allow for construction of a 6-story multi-family residential development which has been completed. Developed commercial sites containing food services and retail businesses are also located immediately to the east.

The local land use pattern is shown in Figure 5 – Aerial View of Site and Surroundings. Views of land uses on the opposite side of Sepulveda Boulevard are shown in Figure 6 – Views of Opposite Side of Sepulveda Boulevard.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Bridge Point South Bay VII Project is a proposal to redevelop 7.36 net acres of land located in the City's Harbor Gateway Community Plan with a new, up to 44 feet high concrete warehouse building, with 174,211 square feet of total floor area and 21 dock high doors for convenient loading/uploading of trucks on a daily basis. All loading and unloading would occur entirely indoors, and the truck court would be on the west side of the building facing adjacent neighboring industrial uses. Warehouse space would occupy 164,567 square feet, with 9,644 square feet of ancillary office space. The office space would be located within 4,686 square feet of ground level and 4,958 square feet of mezzanine space. A total of 29,449 square feet of landscaping would be provided on site, including around the site perimeter and in the parking area along Sepulveda Boulevard. Additional landscaping is provided along Sepulveda Boulevard within the area required for dedication to the City. This represents approximately 9.18 percent of the total site area. Illustrations of the proposed site plan are provided in Figures 7 and 8.

All existing site improvements associated with the vacant former family amusement center and concrete batch plant site would be demolished, prior to site preparation and construction of the proposed warehouse. Total earthwork to re-contour the site for the proposed building pad and drainage patterns would total approximately 52,179 cubic yards. All grading is expected to be balanced on site; however, import of 10 cubic yards may be required.

The warehouse would be built as a “core and shell” structure, leaving subsequent interior improvements to be made by future tenants that lease space in the building. Water, sewer, storm drainage and electrical services would be provided via connections to local existing facilities. A natural gas connection is not planned to the warehouse. The project’s use would be warehouse and distribution, potentially including temporary storage, assembly, and packaging, and may include last-mile delivery. Warehouse activities would occur seven days a week, 24 hours per day, however activities would be almost entirely indoors within an enclosed building.

The warehouse building, site plan and operations have all been designed to minimize noise to adjacent uses. The truck loading bays are located at the western side of the building facing an adjacent industrial use. The truck dock would be inset into the building, with the southern end of the building extending west along the edge of the loading area, thus screening and buffering view of the truck activities from Sepulveda Boulevard. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse building, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels. Trucks would enter through one driveway off of Sepulveda Boulevard on the west side of the Property, away from the apartment building to the east, and in line with the oil well facility to the south. The truck loading area would be gated off for security purposes, which would also provide a visual and noise screen.

On the eastern side of the property, the building would be set back 60 feet from the property line and will include a 12 foot landscaped area on the eastern property boundary with a row of trees, all of which will further buffer the project from the adjacent site. Trucks will not utilize the eastern driveway, and the eastern side of the building will have no truck or employee access (with only emergency fire access doors as required), further limiting activity on the eastern side. The eastern side will be limited to car parking only, which represents a significant reduction in activity in this area compared to the Mulligan’s Family Fun entertainment center that previously operated at this location.

The public-facing frontage of the site has been designed to be visually appealing and pedestrian friendly. The project includes an outdoor employee break area that is approximately 8,000 square feet with seating in a landscaped setting at the front of the building, which both provides a buffer to set back the building from Sepulveda Boulevard, and provides a landscaped site frontage with numerous shade trees. There will be pedestrian connections within this landscape area from the street to the proposed employee office area, thereby providing easy access for building employees to the public sidewalk. The building’s ancillary office area will feature high-end materials and design, adding new modern architecture to Sepulveda Boulevard. This project is consistent with the existing City land use plan and zoning designations.

3.3.2 Design and Architecture

Architectural elevations and distinctive features are shown in Figures 9 through 11.

At a maximum building height of 44 feet, the proposed warehouse building would be consistent with the City's zoning standards, which establishes a height limit across the project site of 45 feet. The warehouse would be comprised of concrete walls, built as a tilt-up structure, with a varied roofline. The architecture of the building has been scaled for pedestrian experience. All four sides of the building's facade incorporate varying reveals, texture and paint changes to minimize the overall scale of the building and emphasize a human scale experience. The design includes concrete panel in multiple paint colors, horizontal line patterns, clear/light gray low-reflective glazing, plus accents provided by anodized awnings, mullions and fins. Canopies are incorporated throughout the façade in varying sizes to reflect the more human scale of a residential project.

3.3.3 Open Space and Landscaping

More than 91 percent of the site would be covered with landscaping covering 29,449 square feet, including 111 new on-site trees, with a variety of canopy style and shade trees along the eastern boundary and within the southern area along Sepulveda Boulevard. Along the eastern boundary that abuts a six-story apartment complex, the landscape buffer would be 12 feet wide, with more than 30 new trees.

An approximately 8,000 square foot landscaped break area for employees would be provided outside the main building entry area, in the southwestern part of the site. This outdoor amenity space would include lunch/seating areas in the form of two permanent, weatherproof picnic tables covered by a trellis providing shade during all seasons of the year. Shade trees and a variety of groundcover and shrubs would provide a green and relaxed environment for employees. The project would also provide convenient and shaded pedestrian connections between the building's main building entry and the public sidewalk, so that employees could easily walk from the building to nearby commercial destinations and the Torrance Transit bus stop on Sepulveda Boulevard.

An enhanced pedestrian environment would also be provided along Sepulveda Boulevard. The Sepulveda Boulevard frontage would be improved with eleven new street trees providing shade, in addition to a number of new shade trees on-site along the property line. These trees, along with the 8,000 square foot landscaped area along Sepulveda Boulevard, would create an enhanced visual environment for pedestrians, bikers, and drivers along Sepulveda Boulevard.

The proposed landscape plan is illustrated in Figure 12.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project will be provided via two full access driveways on Sepulveda Boulevard that are generally in the same location as the two existing driveways, with the eastern driveway slightly shifted to line up with Halldale Avenue to the south. No new curb cuts are proposed. A total of 163 surface level vehicular parking spaces are proposed along the western, eastern and southern sides of the site. Trucks will enter and exit the site from the western driveway, which will be a separate access point from cars to provide a safe separation for both pedestrians and auto vehicles. Auto entry will be provided from the eastern driveway. Truck parking would be available in front

of the dock high doors on the west side of the warehouse. Trash bins would be located just inside the gate on the west side of the building.

3.3.5 Lighting

Outdoor lighting is proposed consisting of building-mounted security lighting, and pole lights to provide sufficient illumination for the parking and drive areas where the building-mounted fixtures do not provide sufficient lighting levels. New lighting is described further in the Aesthetics section of this Initial Study. No illuminated signs are proposed. The pole lighting along the eastern side parking area would be a maximum of 12 feet in height and would be directed downward and shielded to avoid impacting the multifamily residential uses to the east. The pole lighting along the western and southern side parking areas that border neighboring industrial uses and Sepulveda Boulevard respectively, would have a maximum height of 30 feet and would be similarly directed downward and shielded. No pole lighting is proposed along the northern project boundary.

3.3.6 Site Security

The project will include on-site security personnel and/or security cameras. Electronically or manually controlled security gates are proposed at the southwestern entry drive and at the northern drive aisle before entering the truck court. Additionally, the proposed project would include outdoor lighting fixtures to provide minimum safe illumination levels for employees who are active after daylight hours. There would be no outside storage that would attract intruders.

3.3.7 Sustainability Features

The warehouse structure would be designed to meet or exceed the City's building code standards for building energy efficiency, water conservation, waste disposal, and lighting systems, as set forth in the most currently adopted editions of the California Green Building Code Standards and Title 24, Part 6 of the California Code of Regulations. Examples of sustainability features to be provided include:

- 17 car parking spaces will have electric vehicle (EV) chargers;
- 32 car parking spaces will be EV-ready, meaning that electrical conduits will be installed from an electrical room on site to the parking space;
- 8 parking spaces will be designated for "clean air" vehicles
- All truck loading docks will be EV-ready; and
- Designated bicycle parking areas will be provided, including 19 outdoor spaces for short term parking and a locked indoor area for long-term parking of 19 bicycles.

3.3.8 Anticipated Construction Schedule

Construction activities and tentative scheduling would consist of:

Phase	Start	End	Duration
Demolition/Crushing	April 2021	May 2021	4 weeks
Oil Well Reabandonment	May 2021	July 2021	6 weeks
Grading	July 2021	August 2021	4 weeks

Phase	Start	End	Duration
Building Construction	August 2021	July 2022	11 months
Paving	June 2022	July 2022	Overlap with final 4 weeks of building construction
Architectural Coating	May 2022	July 2022	Overlap with final 8 weeks of building construction

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Initial Study will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

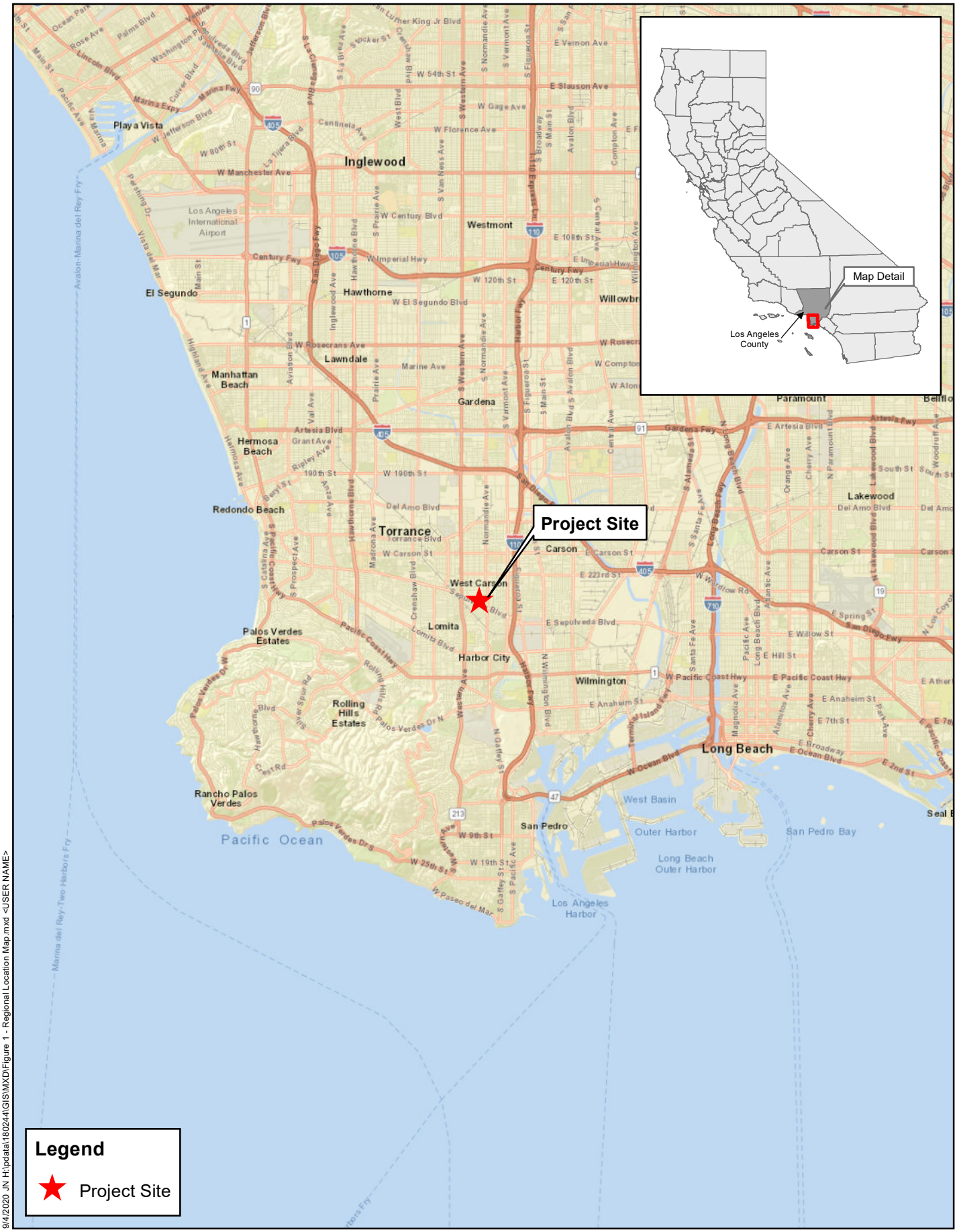
- Pursuant to LAMC Section 16.05, a Site Plan Review for a project that results in an increase of 50,000 gross square feet or more of nonresidential floor area
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary sidewalk/lane closure permits, grading permits, excavation permits, foundation permits, building permits, and lot tie to connect the three lots.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies potential responsible agencies that have been identified for the Project.

- Los Angeles Regional Water Quality Control Board -- National Pollutant Discharge Elimination System Construction General Permit

- California Department of Conservation, Geologic Energy Management Division (CalGEM) – Oil Well Reabandonment Permit



9/4/2020 JN H:\pdata\180244\GIS\MXD\Figure 1 - Regional Location Map.mxd <USER NAME>

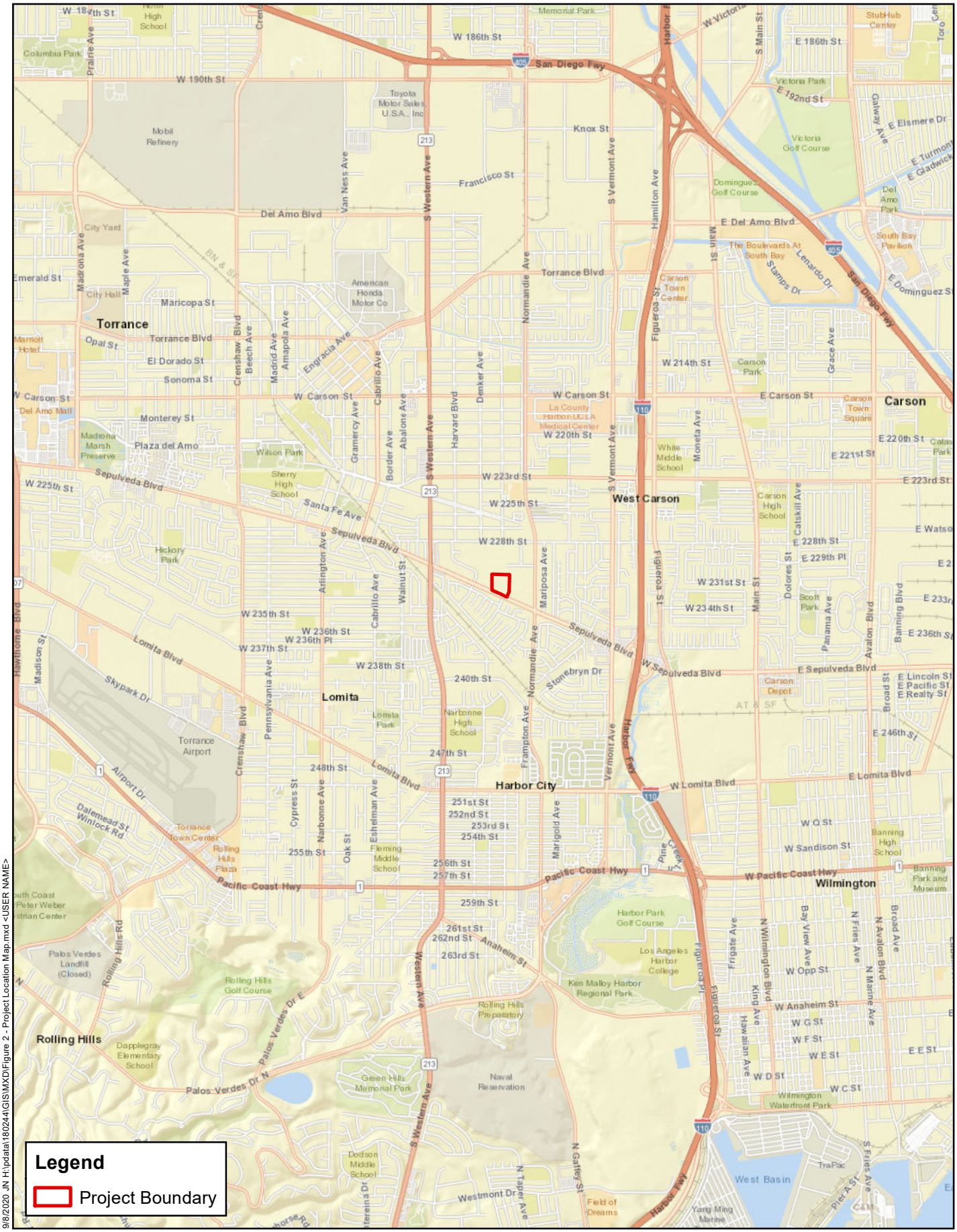
Michael Baker INTERNATIONAL

0 1.5 3 Miles

Source: County of Los Angeles, ArcGIS Online

Regional Location Map

Figure 1



9/8/2020 JN H:\pdata\180244\GIS\MXD\Figure 2 - Project Location Map.mxd <USER NAME>

Michael Baker INTERNATIONAL

0 2,000 4,000 Feet

Source: County of Los Angeles, ArcGIS Online

Project Vicinity Map

Figure 2

Looking West

Looking East

Michael Baker INTERNATIONAL

Source: Michael Baker International

Views Along Sepulveda Boulevard

Figure 3

View east

View west

Entrance to the former amusement center

Former concrete batch plant area

9/4/2020 JN H:\pdata\160244\GIS\MXD\Figure Template-11x17.mxd

Michael Baker INTERNATIONAL

Source: Michale Baker International, Photos taken 09-07-2020

Views of Site Frontage

Figure 4

9/8/2020 JN: H:\pdata\180244\GIS\MXD\Figure 7 - Aerial View of Site and Surroundings.mxd <USER.NAME>

Michael Baker INTERNATIONAL

0 200 400 Feet

Source: County of Los Angeles, Nearmap Imagery 2020

Aerial View of Site and Surroundings

Figure 5

Single pump jack near oil field entrance

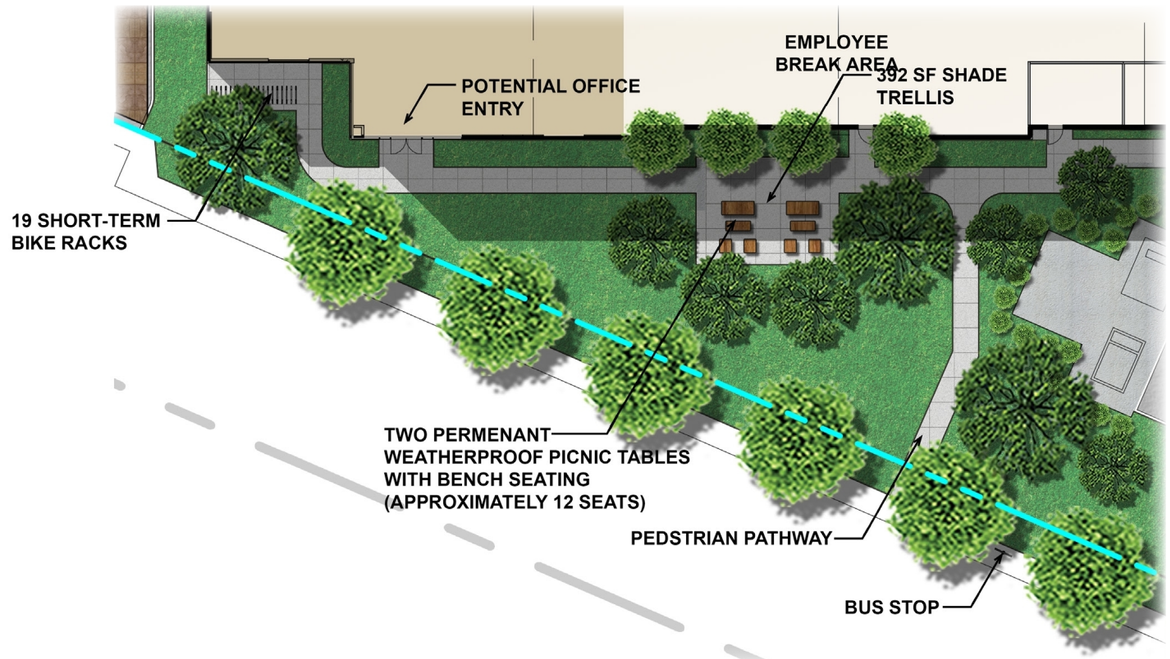
Block wall provides hard edge to separate oil field and single family homes beyond from the street

Michael Baker INTERNATIONAL

Views of Opposite Side of Sepulveda Boulevard

Source: Michael Baker International, Photos taken 09-07-2020

Figure 6



ENLARGED OPEN SPACE AREA - 8,000 SF ±

PROJECT INFORMATION					02.12.2021
GROSS SITE AREA	7.60 AC	331,026 SF			
NET SITE AREA	7.36 AC	320,752 SF			
NET FAR		54.3%			
MAX FAR		150.0%			
ZONE:			MR2-1VL	M2-1VL	M3-1VL
SETBACKS(BLDG):					
	STREET FRONT SETBACK (SEPULVEDA)		15'	NONE	NONE
	INT/REAR SETBACK		NONE	NONE	NONE
BUILDING AREA			174,211 SF		
FOOTPRINT			169,253 SF		
	WAREHOUSE		164,567		
	OFFICE		4,686		
MEZZANINE			4,958		
	OFFICE		4,958		
	PARKING REQUIRED (8'-6"X 18')		71		
	WH @ 1/500 SF 1st 10K SF		20		
	WH @ 1/5,000 SF >10K SF		31		
	OFFICE @ 1/500 SF		20		
			PROVIDED	REQUIRED	
PARKING PROVIDED			163	71	
	STANDARD	8'-6"X 18'	100	35	
	ADA VAN ACCESSIBLE	17'X 18'	1	1	
	ADA STD ACCESSIBLE	14'X18'	5	2	
	EVCS(INSTALLED)	8'-6"X 18'	17	5	
	EVCS(FUTURE)	8'-6"X 18'	32	22	
	CLEAN AIR	8'-6"X 18'	8	6	
	EV CHARGING	**49 STALLS**	30% OF PROVIDED PARKING		
	EV (FUTURE ONLY)	**32 STALLS**	20% OF PROVIDED PARKING		
	EVCS	31 STALLS			
	EVCS AMBULATORY	1 STALL			
	EV (INSTALLED)	**17 STALLS**	10% OF PROVIDED PARKING		
	EVCS	15 STALLS			
	EVCS VAN ACCESSIBLE	1 STALL			
	EVCS STD ACCESSIBLE	1 STALL			
	SHORT-TERM BICYCLE PARKING		19		
	LONG-TERM BICYCLE PARKING		19		
NET	LANDSCAPE REQUIRED		NONE		
NET	LANDSCAPE PROVIDED		9.18%	29,449 SF	

Michael Baker INTERNATIONAL

Source: Herdman Architecture and Design, February, 2021

Site Plan

Figure 7

EXISTING INDUSTRIAL

EXISTING INDUSTRIAL

EXISTING INDUSTRIAL

MULTI-FAMILY RESIDENTIAL (in Commercial Zone)

EXISTING INDUSTRIAL

EXISTING RESIDENTIAL

EXISTING OILFIELD

EXISTING COMMERCIAL

PROPOSED BUILDING
174,211 S.F.

3HR RATED WALL

21 DOCK-HI DOORS

GATE

RAMP

DRIVE THRU DOOR

POTENTIAL OFFICE

POTENTIAL OFFICE

19 INDOOR LONG-TERM BIKE RACKS

10 SHORT-TERM BIKE RACKS

12' LANDSCAPE BUFFER

135'

347'

474'

66'

40'

60'

Sepulveda Blvd

SEPULVEDA BLVD

2/16/2021, JN H:\data\180244\GIS\MXD\Figure 4 - Site Plan and Surrounding Land Uses.mxd

Michael Baker INTERNATIONAL

Source: Herdman Architecture and Design, February 2021

Site Plan and Surrounding Land Uses

Figure 8

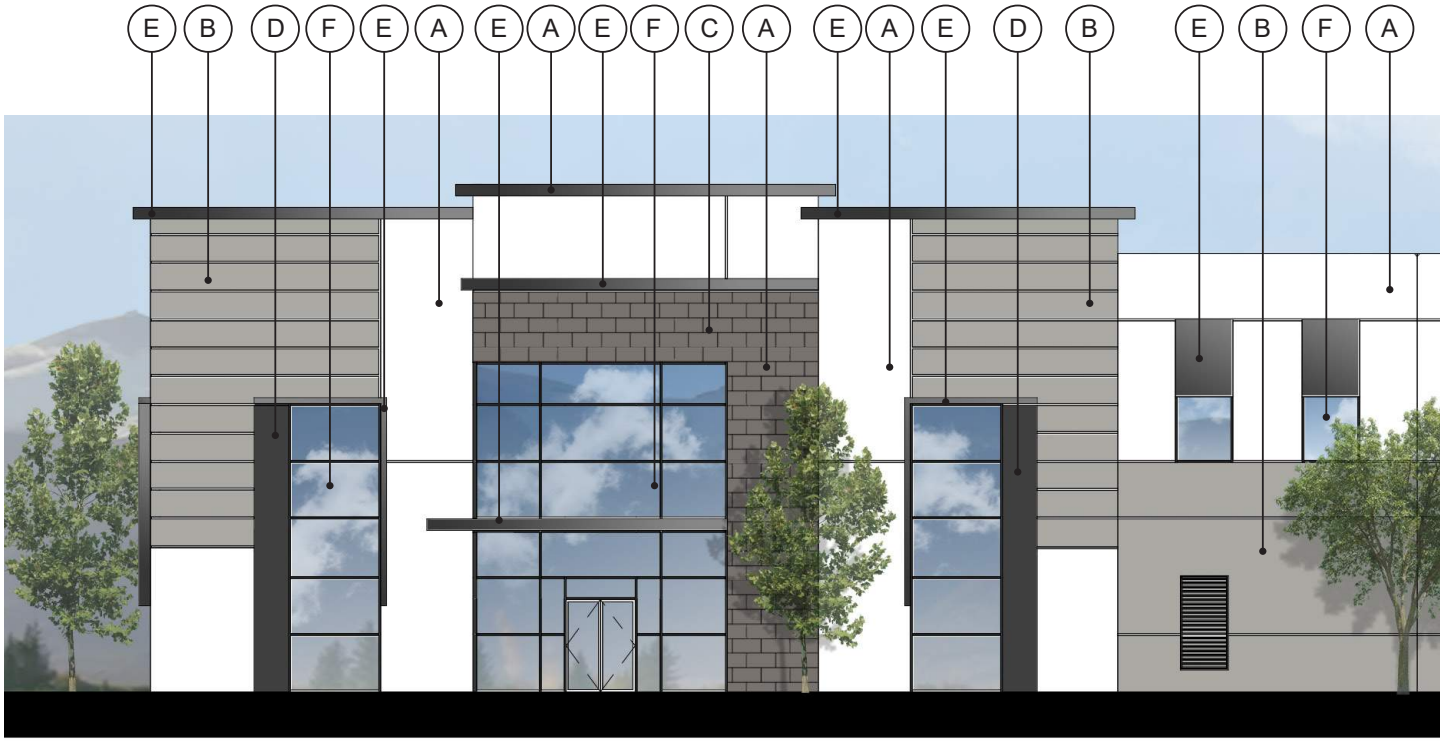
WEST ELEVATION

SOUTH ELEVATION

NORTH ELEVATION

EAST ELEVATION

NOTE: TREES DO NOT REPRESENT PROPOSED LANDSCAPING, IN ORDER TO SHOW THE BUILDING ARCHITECTURE.
PROPOSED LANDSCAPING IS SHOWN ON A SEPARATE SHEET.



ENLARGED VIEW @ SOUTH ELEVATION

A. PAINTED CONCRETE PANEL
SW 7005:
PURE WHITE

B. PAINTED CONCRETE PANEL
SW 7650:
ELLIE GRAY

C. PAINTED CONCRETE PANEL W/FORMLINER
SW 7019:
GAUNTLET GRAY

D. PAINTED CONCRETE PANEL
SW 7069:
IRON ORE

E. DARK BRONZE ANODIZED FINS/ AWNINGS/ CAPS

F. CLEAR/ LIGHT GRAY REFLECTIVE GLAZING WITH DARK BRONZE ANODIZED MULLIONS

NOTE: TREES DO NOT REPRESENT PROPOSED LANDSCAPING, IN ORDER TO SHOW THE BUILDING ARCHITECTURE. PROPOSED LANDSCAPING IS SHOWN ON A SEPARATE SHEET.

Michael Baker INTERNATIONAL

Source: Herdman Architecture and Design, November 2020

Building Materials and Colors

Figure 10

VIEW OF SOUTHWEST OFFICE CORNER

WHITE PAINT

LIGHT GRAY PAINT

DARK GRAY PAINT

CLEAR/ LIGHT GRAY REFLECTIVE GLAZING

DARK BRONZE ANODIZED CANOPIES & METAL ACCENTS

NOTE: TREES DO NOT REPRESENT PROPOSED LANDSCAPING, IN ORDER TO SHOW THE BUILDING ARCHITECTURE. PROPOSED LANDSCAPING IS SHOWN ON A SEPARATE SHEET.

Michael Baker INTERNATIONAL

Source: Herdman Architecture and Design, November 2020

Southwest Corner Building Articulations

Figure 11

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Chilopsis linearis Desert Willow	24" Box	8	L	Multi
	Chitalpa tashkentensis Chitalpa	24" Box	21	L	Standard
	Quercus agrifolia Coast Live Oak	24" Box	6	M	Multi
	Rhus lancea African Sumac	24" Box	17	L	Standard
	Tristania conferta Brisbane Box	24" Box	59	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	257	M	
	Cassia phyllodenia Silverleaf Cassia	5 Gal	200	L	
	Dianella tasmanica Dianella	5 Gal	99	M	
	Dietes bicolor Fortnight Lily	5 Gal	119	M	
	Ligustrum j. 'Texanum Texas Privet	5 Gal	236	M	
	Rhaphiolepis i. 'Clara' Indian Hawthorn	5 Gal	157	M	Hedge
	Westringia f. 'Grey Box Dwarf Coast Rosemary	5 Gal	137	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Carissa m. 'Green Carpet' Prostrate Natal Plum	1 Gal	36" O.C.	M	
	Hemerocallis hybridus-Yellow Yellow Day Lily	1 Gal	24" O.C.	M	
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	

Street Trees

Note: Good faith efforts will be made to preserve up to 10 existing on-site trees; preservation will depend on health of the trees, location of their root systems, and construction/grading constraints of development activities.

N

0 15' 30' 60'

Michael Baker INTERNATIONAL

Source: Hunter Landscape, November 2020

Landscape Plan

Figure 12

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No Impact. A significant impact would occur if the Proposed Project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The project locale is a fully urbanized setting along Sepulveda Boulevard, a major roadway that is not designated as a scenic route or corridor of any kind. There is a mixture of building forms, parking lots, overhead utility lines, signs and ornamental landscaping that dominate the local

visual character along Sepulveda Boulevard and around and beyond the project site. There are no focal points or panoramic views of scenic vistas in this area. There are no conditions that represent the attributes of a scenic corridor as defined in the Open Space Element of the General Plan.

The proposed building would have a maximum building height of 44 feet, which is less than the 45 feet limit established in the City's zoning code. The majority of the structure would be set back 135 feet from most of the western boundary, and one portion of the building would be 71 feet from the western boundary closest to Sepulveda Boulevard. Along the eastern property line, the building would be setback 60 feet and include a 12-foot-wide landscaped area with a row of trees to buffer the project from the adjacent site, which consists of a six story apartment complex. The building would be setback a minimum of 15 feet from the new property line along Sepulveda Boulevard (after dedication), to a maximum of 185 feet near the eastern drive aisle. These setbacks meet or exceed the City's standard for a minimum 15 foot front yard in the MR2 Zone, which applies only to the smallest central parcel. The balance of the project site is in the M2 and M3 zones, which have no requirement for front yards. Additional trees would be planted throughout the project site, including within a landscaped employee break area provided along the Sepulveda Boulevard frontage. The new trees to be planted on the site would replace existing mature trees and would reduce the current distant view obstruction that occurs with the existing trees. Project implementation would not obstruct any views of unique scenic vistas or focal points. Therefore, impacts related to scenic vistas would be less than significant. As such, the Proposed Project would not affect any scenic vistas and there would be no impact.

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

No Impact. A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway. There are no State or County designated or eligible scenic highways near the Project Site (Caltrans 2019). The City of Los Angeles' General Plan Mobility Element (Citywide General Plan Circulation System Maps) indicates that no State-designated scenic highways are located near the project site. Therefore, no impacts related to a State-designated scenic highway would occur.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact would occur if the proposed project would conflict with applicable zoning and other regulations governing scenic quality.

The project site is located in a fully urbanized setting, comprised of a mixture of mostly low-rise building forms, paved automobile parking areas, overhead utility lines, ornamental landscaping, walls, signs and streets. There are low-rise industrial and commercial buildings adjacent to the project site on the west, north and east. A six-story apartment complex is located along most of the eastern edge of the project site. On the opposite side of Sepulveda Boulevard is an oil field that is mostly obscured from view by a block wall and fencing. Tops of single family homes are

visible above block walls and beyond the oil field and to the east and west along Sepulveda. Please refer to Figures 3, 4 and 6, in Section 3 – Project Description, for views of the current visual conditions in the project area.

The Proposed Project site currently consists of a mixture of numerous ornamental trees, obscured buildings, vehicle parking areas, a 2-3 stories tall metal structure surrounded by a vacant lot, and a thin landscape strip along the site frontage that shows signs of deterioration due to lack of maintenance. This condition would be replaced with an improved modern warehouse building separated from Sepulveda Boulevard by extensive landscaping and shade trees. Vehicle parking and drive areas would also be provided on site. All site improvements would be consistent with the City's zoning and development standards. Proposed design features are noted below.

At a maximum building height of 44 feet, the proposed warehouse building would be consistent with the City's zoning standards, which establish a height limit across the project site of 45 feet. The warehouse would be comprised of concrete walls, built as a tilt-up structure. The architecture of the building has been scaled for pedestrian experience. All four sides of the building's facade incorporate varying reveals, texture and paint changes to minimize the overall scale of the building and emphasize a human scale experience. The design includes concrete panel in multiple paint colors, horizontal line patterns, clear/light gray non-reflective glazing, plus accents provided by anodized awnings, mullions and fins. Canopies are incorporated throughout the façade in varying sizes picking up the more human scale of a residential project. Please refer to Figures 9-11, for illustrations of proposed building elevations and architectural features.

The existing industrial zoning does not establish requirements for rear or side yards or a minimum level of landscape coverage. The Proposed Project includes landscaping throughout the site, including along the Sepulveda Boulevard frontage and around the site perimeter. A total of 29,449 square feet of landscaping is proposed, representing 9.18 percent of the entire site area. A landscaped area is proposed along the Sepulveda Boulevard frontage where an outdoor employee "break area" would be located, including seating, walkways, and shaded areas. Landscaping along the street frontage would be a minimum of 28 feet deep, with greater depths at the driveway entrances and in the employee break area. Additional landscaping would be provided along Sepulveda Boulevard within the area required for dedication to the City. At the eastern boundary, a 12-foot-wide landscape buffer with a row of more than 30 new trees would be provided. In total, the project would include a variety of 111 trees, including shade trees, to provide a softened landscaped view of the site and visual buffer from surrounding properties. Please refer to Figure 12 for additional landscaping details.

The building would be set back 60 feet from the eastern property line. The building would be set back a minimum of 40 feet from the rear (northern) property line, which abuts a site developed with an industrial building. Most of the western side of the warehouse, where the truck bays would be located, would be set back 135 feet from the western property line, which abuts land developed with low-rise industrial buildings. Closer to Sepulveda, the building extends farther west, 71 feet from the western boundary, to serve as a visual and noise buffer between the truck dock area and Sepulveda. Due to the angular aspect of the south property line along Sepulveda Boulevard, the warehouse building would have a varying setback from that the Sepulveda Boulevard

frontage, with a minimum of 15 feet near the main drive entrance at the southwest corner, to a maximum of 185 feet near the eastern drive aisle. These setbacks meet or exceed the City's standard for a minimum 15 foot front yard in the MR2 Zone, which applies only to the smallest central parcel. The balance of the project site is in the M2 and M3 zones, which have no requirement for front yards.

The project would comply with all City of Los Angeles tree regulations. A complete tree inventory was conducted at the project site, which determined that there are 141 total trees within the site and along the street frontage (see Appendix C). The highest numbers of tree species include Canary Island pines (42), Indian laurel fig (13) and 56 queen palms. There are no trees that are classified as a protected species, as defined in Section 17.02 of the Los Angeles Municipal Code and Ordinance No. 177,404. Specifically, there are no Southern California black walnuts, no oak trees, no California bay laurels, or any western sycamores. Removal of the existing trees, therefore, would not require any City approvals. All of the existing trees are ornamental species planted as part of the former Mulligan's family fun center as part of the design character for that land use. Removal of existing trees, as proposed, would not involve impacts to trees that are recognized as a scenic resource. The Proposed Project includes removal of up to 141 trees in order to grade the site, and planting 111 new trees, distributed around the site perimeter and concentrated within the employee break area along Sepulveda Boulevard. As there are no protected trees, there would be no net loss of protected trees, and no street trees would be removed.

The proposed project would include design features and landscaping improvements to enhance the visual quality of the area. The proposed project would create a modern industrial development site with enhanced architectural and landscape treatments that would integrate well into the local visual environment. The project is consistent with all zoning regulations and would not conflict with applicable zoning and other regulations governing scenic quality; therefore, the project impacts would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirrorlike materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include street lights, vehicle headlights, and interior and exterior building illumination.

Existing outdoor lighting sources in the project vicinity include streetlights, commercial signs, parking lot pole-mounted lighting fixtures and building-mounted security lighting fixtures. There are no operating lighting sources within the project site. The commercial sites located to the east are the most illuminated sites in this area and have the most lighting on a nightly basis.

Outdoor lighting is proposed consisting of building-mounted security lighting, and pole lights along the site perimeter, to provide sufficient illumination for the parking and drive area where the building-mounted fixtures do not provide sufficient lighting levels. As noted on the lighting plan submitted with the project application materials, all pole lighting will be equipped with back shields to prevent light spillage onto adjacent properties. No illuminated signs are proposed. The pole lighting along the eastern side parking area would be a maximum of 12 feet in height and shielded and directed downward to avoid impacting the multifamily residential uses to the east. The pole lighting along the western and southern side parking areas that border neighboring industrial uses and Sepulveda Boulevard respectively, would have a maximum height of 30 feet and would be similarly shielded and directed downward. No pole lighting is proposed along the northern Project boundary. The project would include limited commercial glass expanses to limit glare and would use low glare and non-reflective glazing to provide daylight for building users. Glazing materials would be clear or light gray. The proposed project does not include any elements or features that would create substantial new sources of glare.

With minimal night lighting sources that would be designed to confine illumination on-site and non-reflective walls and glazing surfaces, the Proposed Project would not result in adverse light or glare impacts and would not adversely affect day or nighttime views in this area. Impacts would be less than significant.

II. AGRICULTURE AND FORESTRY 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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with 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))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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. A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that are used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. The project site is not located within any FMMP designation map and therefore does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2020). Therefore, the project would not convert Farmland to non-agricultural use, and no impact would occur.

The project site is currently developed with vacant buildings, extensive pavement, landscaping, and a miniature golf course. No farmland, agricultural uses, or related operations occur within the project site or surrounding area.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The project site is zoned MR2-1VL, M2-1VL, and M3-1VL and has a General Plan Land Use Designation of Heavy Manufacturing and Light Manufacturing. Restricted Light Industrial Zones (MR2), Light Industrial Zones (M2), and Heavy Industrial Zones (M3) are intended for a variety of industrial and manufacturing uses, including warehouses. The project site has been developed with a variety of commercial, industrial, and residential land uses since approximately 1924 and is located in a fully developed area comprised of a mix of residential, commercial, and industrial land uses and a full array of urban infrastructure. The proposed project would have no impact involving a conflict with zoning for agricultural use. This property is not encumbered by a Williamson Act contract or any other sort of deed or land use restrictions intended to preserve or foster agricultural uses; therefore, there would be no impact involving a conflict with such land restrictions.

c. Conflict with 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. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. The project site does not contain any forest land, timberland, or timberland zoned Timberland Production as defined by the regulatory code sections noted above; it has been in use as a commercial recreation center, concrete batch plant, and several other land uses for decades, and there are no forest or timber resources on or near the site. As noted above, the subject property is zoned MR2-1VL, M2-1VL, and M3-1VL, which are intended

to foster and control development of a range of manufacturing and industrial uses and has no applicability to any kind of forest land or timberland. All surrounding land is fully developed with industrial, residential, commercial and oilfield land uses; there is no forest or timberland on or near the project site. Therefore, there would be no impact involving a conflict with zoning for forest land or timberland.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. The project site has been previously disturbed and developed with a variety of commercial, residential, and industrial land uses and does not contain any forestland. All surrounding land is fully developed with industrial, residential, commercial and oilfield land uses; there is no forest or timberland on or near the project site. Therefore, the project would not cause the conversion of forest land to non-forest use, and no impact would occur.

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. A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. The project site does not contain farmland, forestland, or timberland. The site is located in an urbanized area and does not contain any agricultural uses, Farmland, forest land, or timberland resources. As a result, the proposed warehouse/distribution project would not cause the conversion of Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. 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?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The following analysis addresses the impact thresholds by summarizing the Air Quality, Energy, and Health Risk Assessment Impact Analysis (the "Air Quality Analysis") prepared for the proposed project by Vista Environmental in February 2021. This report can be found in this IS/MND as Appendix A.

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

Less Than Significant Impact With Mitigation Incorporated. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2016 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. 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 in the City of Los Angeles, within the South Coast Air Basin (SCAB), which is bound by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and by the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded; in 2015, the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) were exceeded

on one or more days in the SCAB for ozone (O_3), inhalable particulates (particulate matter $\leq$ 10 microns, PM_{10}), and ultra-fine particulates (particulate matter $\leq$ 2.5 microns, $PM_{2.5}$) at most monitoring locations. The nearest local monitoring stations to the Project Site that measure particulate matter (Long Beach monitoring station (measures PM_{10}), located 4.8 miles southeast of the project site, and the Compton monitoring station (measures $PM_{2.5}$), located 8.6 miles northeast of the project site) exceeded PM_{10} and $PM_{2.5}$ CAAQS on multiple days in 2016, 2017, and 2018. The Long Beach monitoring station did not register any exceedances during these years for O_3 or NO_2. Further, no areas of the SCAB exceeded federal or state standards for nitrogen dioxide (NO_2), sulfur dioxide (SO_2), carbon monoxide (CO), sulfates, or lead (Pb). Because of the violations of the CAAQS, the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP) by regional air pollution control districts such as SCAQMD. The current AQMP for the SCAB was adopted by SCAG in 2016. This AQMP analyses air quality on a regional level and identifies region-wide attenuation methods to achieve pollutant levels consistent with air quality standards. These region-wide attenuation methods include regulatory control measures (e.g., NO_x emissions from stationary sources), incentive-based programs to encourage advanced deployment of newer clean technologies, documenting co-benefits from climate / GHG reduction programs, and reductions in federal sources (such as aircraft, locomotives, and ocean-going vessels).

The purpose of this analysis is to discuss project consistency with the assumptions and objectives of the AQMP and discuss whether the project would obstruct implementation of the AQMP, therefore interfering with the region's ability to comply with federal and state air quality standards.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP," (SCAQMD 1993). For the purpose of this analysis, the proposed project is considered to be a "significant project", but it does not require a general plan amendment or zone change, as the proposed warehouse/distribution facility with ancillary office use is consistent with the project site's land use designation of the General Plan, as well as the zoning identified in the Los Angeles Municipal Code. Strict consistency with all aspects of the plan is usually not required. Rather, a project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

- Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated below.

Criterion 1 – Increase in the Frequency or Severity of Violations

For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in **Tables III-1 and III-2**. Criteria air pollutant and localized pollutant emissions created by the

proposed project have been calculated through use of the California Emissions Estimator Model (CalEEMod) Version 2016.3.2, which is a computer model published by the SCAQMD for estimating air pollutant emissions. The methodology and assumptions made when calculating project emissions is further discussed in response to Threshold III-b, below.

TABLE III-1
SCAQMD REGIONAL CRITERIA POLLUTANT EMISSIONS THRESHOLD OF SIGNIFICANCE

Activity	Pollutant Emissions (pounds/day)						
	VOC	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$	Lead
Construction	75	100	550	150	150	55	3
Operation	55	55	550	150	150	55	3

Source: Source: Vista Environmental, February 2021.

Table III-2 shows the SCAQMD local air quality thresholds for NO_2, PM_{10} and $PM_{2.5}$ for construction and operational activities.

TABLE III-2
SCAQMD LOCAL AIR QUALITY THRESHOLDS OF SIGNIFICANCE

Activity	Allowable Emissions (pounds/day)[1]			
	NOx	CO	PM_{10}	$PM_{2.5}$
Construction	91	664	5	3
Operation	91	664	1	1

Notes:
The nearest offsite sensitive receptors are multi-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25 meter threshold, one acre of disturbance and air quality monitoring conditions in Southwest Coastal Los Angeles County.
Source: Vista Environmental, February 2021—see Section 7.2 for additional explanation of the methodology.

Construction activities would generate a variety of air pollutant emissions, including exhaust from combustion-powered machinery (such as excavators, graders, cranes, and pavers), trucks and passenger vehicles, fugitive dust from demolition, grading and construction activities, and release of VOCs associated with painting and coatings applied to the warehouse building and in the laying of asphalt in parking and drive areas. A quantitative analysis of construction period emissions was prepared, based on the construction phases presented in the Project Description of this IS/MND and the range of construction equipment and durations provided in Table I of the air quality report prepared for this project. For purposes of this analysis, it is assumed that construction activities would begin in April 2021 and would end in May 2022, with a total of 330 active construction days.

Based on the air quality modeling analysis contained in the air quality report prepared for this project and summarized in **Table III-3** later in this section, short-term regional construction air emissions would not result in significant impacts based on SCAQMD thresholds of significance. However, the short-term construction period emissions would exceed SCAQMD's Local Significance Thresholds (LST) for particulate matter during the demolition (PM_{10},) and grading (PM_{10} and $PM_{2.5}$) activities of the project, as identified in **Table III-4**. Mitigation Measures III-1 and III-2 have been provided to reduce the localized PM_{10} and $PM_{2.5}$ concentrations to less than significant levels. Therefore, the project would result in a less than significant impact on regional

and local air quality, with implementation of Mitigation Measures III-1 and III-2, as is further discussed later in this section.

Mitigation Measures: The following mitigation measure would be required during project construction.

MM III-1: The contractor shall:

- Water a minimum of three times daily to control dust during ground-disturbing activities,
- Apply chemical soil stabilizers on inactive areas (i.e., disturbed areas within the site that are unused for four consecutive days) during grading operations,
- Suspend grading operations when wind speeds exceed 25 miles per hour,
- At least once a day during ground-disturbing activities, operate PM10-efficient street sweepers or roadway-washing trucks on adjacent roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving or bringing materials, and
- Schedule construction activities in accordance with specific SCAQMD directives.

MM III-2: All off-road diesel-powered equipment (non-street legal), that is greater than 50 horsepower that is used onsite during construction of the project shall meet USEPA Tier 4 off-road emission standards. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, then the permittee or its contractor shall comply with an off-road equipment plan approved by the City prior to the issuance of grading permits. The off-road equipment plan must demonstrate that the off-road equipment used on-site to construct the project would reduce construction emissions to below SCAQMD standards.

The ongoing operation of the proposed project would generate air pollutant emissions that are less than significant on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance identified in **Table III-1**, above. The analysis for long-term regional and local air quality impacts (as indicated in **Table III-6** and **Table III-7**, below) show that the project's operational pollutant concentrations would not exceed air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Thus, based on the information provided above, the proposed project would not result in an increase in the frequency or severity of existing air quality violations, would not contribute to new violations, or delay timely attainment of air quality standards or interim emissions reductions identified in the AQMP. In short, the project would be consistent with the first AQMP consistency criterion.

Criterion 2 – Exceed Assumptions in the AQMP

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the

AQMP. The AQMP is developed through use of the planning forecasts provided in the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Federal Transportation Improvement Program (FTIP). The RTP/SCS is a major planning document for the regional transportation and land use network within Southern California. The RTP/SCS is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to align their local general plans with these regional plans, and this includes participating in the growth forecasts developed for the RTP/SCS to reflect the land use assumptions in the local general plans. For the proposed project, the City of Los Angeles General Plan's Land Use Plan defines the long range land use assumptions that are represented in the AQMP.

The project site is currently designated as Light and Heavy Manufacturing in both the General Plan and the Los Angeles Zoning Code. The proposed warehouse/distribution facility and ancillary office use are allowed uses in the Manufacturing land use designation. As such, the proposed project is consistent with the current land use designation and would not conflict with AQMP assumptions for regional growth and is found to be consistent with the AQMP for the second criterion.

It is noted that the proposed project would not conflict with the main emissions reduction strategies of the AQMP, with regard to the AQMPs regulatory control measures (e.g., NO_x emissions from stationary sources), incentive-based programs to encourage advanced deployment of newer clean technologies, documentation of co-benefits from climate and GHG reduction programs, and reductions in federal sources (such as aircraft, locomotives, and ocean-going vessels). All of those strategies are outside of the scope of this project. The proposed project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. The proposed project is also subject to the City's Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. Therefore, based on the above analysis, the proposed project would not result in an inconsistency with or impede implementation of the SCAQMD AQMP and project impacts would be less than significant, with implementation of Mitigation Measures III-1 and III-2.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant With Mitigation Incorporated. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards for criteria pollutants of concern. Specifically, as stated above, the SCAB is a non-attainment area for ozone and $PM_{2.5}$ (per the USEPA) and for ozone, PM_{10}, and $PM_{2.5}$ (per the California Air Resources Board (CARB)).

Construction -Related Emissions

The construction activities for the proposed project are anticipated to include demolition of the existing Mulligan Family Fun Center; re-abandoning existing oil wells on the project site; grading

of the 7.40-acre project site; building construction of the warehouse, paving of the onsite parking, vehicle circulation and, truck loading areas, and application of architectural coatings. The construction emissions have been analyzed for both regional and local air quality impacts, as discussed in the following sections. The criteria air pollutant emissions created by the proposed project and presented in the following sections have been calculated through use of the CalEEMod Version 2016.3.2, which is a computer model published by the SCAQMD for estimating air pollutant emissions. This includes exhaust emissions from construction crew vehicles, dump trucks, bulldozers and other combustion-powered equipment, particulate matter generated during demolition, grading, and other ground disturbing activities, and gaseous compounds generated during application of paints and coatings to the warehouse structure and from asphalt and concrete paving. The input parameters utilized in this analysis, specifically the construction phasing, duration, and activity levels, are detailed in the air quality report prepared for this project. The proposed project's anticipated construction timeline is provided in the Project Description of this IS/MND. Further, the analysis assumes compliance with SCAQMD rules, including Rule 403 controlling emissions of fugitive dust, Rules 1108 and 1108.1, which control VOC content in asphalt, Rule 1113, which controls VOC content in paints and solvents, and Rule 1143, which controls the VOC content in paint thinners.

The worst-case summer or winter daily construction-related criteria pollutant emissions from the proposed project for each phase of construction activities are shown below in **Table III-3**. Since it is possible that building construction, paving, and architectural coating activities could occur concurrently towards the end of the building construction phase, Error! Reference source not found.**Table III-3** also shows the regional pollutant emissions from building construction in 2021, as well as combined regional criteria pollutant emissions from building construction (in 2022), paving, and architectural coating phases of construction.

TABLE III-3
CONSTRUCTION-RELATED REGIONAL CRITERIA POLLUTANT EMISSIONS

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO_2	PM10	PM2.5
Demolition						
Onsite	3.17	31.44	21.57	0.04	7.86	2.40
Offsite	0.34	8.55	2.67	0.03	0.74	0.22
Total	**3.50**	**39.99**	**24.23**	**0.06**	**8.60**	**2.62**
Oil-Wells Reabandonment						
Onsite	1.83	15.87	10.87	0.04	0.58	0.54
Offsite	0.10	0.82	0.81	0.00	0.22	0.06
Total	**1.92**	**16.69**	**11.67**	**0.04**	**0.80**	**0.60**
Grading						
Onsite	2.29	24.74	15.86	0.03	7.71	4.43
Offsite	0.09	0.63	0.76	0.00	0.21	0.06
Total	**2.38**	**25.37**	**16.61**	**0.03**	**7.92**	**4.49**
Building Construction (year 2021)						
Onsite	1.90	17.43	16.58	0.03	0.96	0.90
Offsite	0.63	4.31	5.27	0.02	1.45	0.40
Total	**2.53**	**21.74**	**21.84**	**0.05**	**2.41**	**1.30**
Combined Building Construction (year 2022), Paving and Architectural Coatings						
Onsite	44.14	28.14	32.76	0.05	1.46	1.36
Offsite	0.75	4.18	5.99	0.02	1.86	0.51
Total	**44.90**	**32.32**	**38.74**	**0.07**	**3.31**	**1.88**
Maximum Daily Construction Emissions	**44.90**	**39.99**	**38.74**	**0.07**	**8.60**	**4.49**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
1. Onsite emissions are from equipment not operated on public roads, while offsite emissions are from vehicles operating on public roads.

Source: Vista Environmental, February 2021

As shown in **Table III-3,** above, the combined phase of building construction (in 2022), paving, and architectural coatings would generate the highest levels of VOCs, CO, and SO_2 emissions of any of the individual construction phases. Oil well reabandonment would generate the greatest levels of NO_x and PM_{10} emissions because of the concurrent use of an electrical drilling rig, a concrete mixer, and a mud pump. For example, the oil well reabandonment phase would involve reabandoning three existing oil wells that have previously been abandoned, but not to current standards. The abandonment phase is anticipated to take up to six weeks, with the reabandonment of the three wells occurring concurrently. The onsite equipment utilized during the reabandonment of one well would consist of a concrete mixer truck and an 800-horsepower generator that would power an electrical drill rig, a separator, and a mud pump. In addition, one well would generate six vendor truck trips for fuel, two for water, and two for delivery/pickup of equipment, for a total of 12 vendor truck trips per week or an average of 2.4 vendor trips per weekday. Other equipment used during construction phases would include haul trucks, dozers, and excavators during demolition; graders, loaders and backhoes during grading; a crane, generator, and several loaders during building construction; pavers and rollers during paving; and one air compressor during the architectural coating phase. Worker vehicles would also be present on-site during all construction phases. **Table III-3** shows that when considering the maximum daily construction emissions, none of the analyzed criteria pollutants would exceed the regional emissions thresholds during either demolition, oil well reabandonment, site preparation, grading, construction, or the combined building construction, paving and architectural coatings phases. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project.

The local air quality emissions from construction were analyzed through utilizing the methodology described in *Localized Significance Threshold Methodology* (LST Methodology), prepared by SCAQMD, revised October 2009. The LST Methodology found the primary criteria pollutant emissions of concern are NO_x, CO, PM_{10}, and $PM_{2.5}$. The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of a project site and distance to the nearest sensitive receptors. The Look-Up Tables include site acreage sizes of 1-acre, 2-acres and 5-acres. The Project Site is located in Monitoring Area 3, which covers the Southwest Coastal LA County. The 1-acre project site values in the Look-Up Tables were utilized in this analysis, since the LST Methodology details the site acreage should be based on the maximum number of acres disturbed on the peak day of construction that is calculated on the construction equipment list utilized in the CalEEMod model, where crawler tractors, graders, and rubber tired dozers are all assumed to disturb 0.5-acre in an 8-hour day and scrapers are assumed to disturb 1.0-acre in an 8-hour day. Further, using the 1-acre project site values is considered a conservative method, since the threshold of significance is lower as compared with an analysis that interpolates the 2-acre and the 5-acre project site values for a 7.40-acre project site.

Table III-4 shows the onsite emissions generated by CalEEMod for the different construction phases and the calculated localized emissions thresholds that are discussed earlier in this section. Since it is possible that building construction (in year 2022), paving, and architectural coating activities may occur concurrently towards the end of the building construction phase, **Table III-4Error! Reference source not found.** also shows the combined local criteria pollutant emissions from these concurrent construction activities.

TABLE III-4
CONSTRUCTION RELATED LOCAL CRITERIA POLLUTANT EMISSIONS – PRIOR TO MITIGATION

Phase	Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Demolition	32.51	21.90	7.95	2.42
Oil Wells Abandonment	15.97	10.97	0.61	0.54
Grading	24.81	15.95	7.74	4.44
Building Construction (year 2021)	17.97	17.23	1.14	0.95
Combined Building Construction (year 2022), Paving and Architectural Coatings	30.51	33.79	1.84	1.57
Maximum Daily Construction Emissions	**30.51**	**33.79**	**7.95**	**4.44**
SCAQMD Local Construction Thresholds[2]	**91**	**664**	**5**	**3**
Exceeds Threshold?	No	No	Yes	Yes

Notes:

1. *The nearest sensitive receptors to the project site are multi-family homes located adjacent to the east side of the Project Site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25 meter threshold. Thresholds are based on a 1-acre disturbance area and air quality monitoring conditions in Southwest Coastal Los Angeles County*

Source: Vista Environmental, February 2021. See Section 7.2 of the Vista Environmental report for additional explanation of methodology.

The data provided in **Table III-4** show that the only exceedance of the localized thresholds would be from PM_{10} during both demolition and grading activities and from $PM_{2.5}$ during grading activities. This would be considered a significant impact.

Mitigation Measures MM III-1 and MM III-2 have been included to reduce the local PM_{10} and $PM_{2.5}$ localized emissions to less than significant levels. Specifically, MM III-1 requires that the contractor water all disturbed areas a minimum of 3 times per day, apply chemical stabilizers on inactive areas, suspend grading activities when wind speeds exceed 25 miles per hour, utilize street sweepers at least once per day on adjacent roadways to remove any dirt dropped by construction vehicles, and schedule construction activities in accordance with specific SCAQMD directives. Mitigation Measure III-2 requires that all off-road diesel-powered equipment (non-street legal), that is greater than 50 horsepower that are used onsite during construction of the project meet USEPA Tier 4 off-road emission standards. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, then the permittee or its contractor shall comply with an off-road equipment plan approved by the City prior to the issuance of grading permits. The off-road equipment plan must demonstrate that the off-road equipment used to on-site to construct the project would reduce construction emissions to below SCAQMD standards.

The mitigated emissions shown in Appendix A of the Air Quality Analysis (see Appendix A of this IS/MND) accounts for implementation of Mitigation Measures MM III-1 and MM III-2 and a summary of the CalEEMod model results are shown in **Table III-5**, below.

TABLE III-5
MITIGATED CONSTRUCTION-RELATED LOCAL CRITERIA POLLUTANT EMISSIONS

Phase	Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Demolition	3.07	23.61	2.99	0.52
Oil Wells Abandonment	2.22	17.97	0.09	0.07
Grading	6.85	17.60	3.34	1.86
Building Construction (year 2021)	7.82	18.13	0.57	0.42
Combined Building Construction (year 2022), Paving and Architectural Coatings	19.08	34.70	1.19	0.96
Maximum Daily Construction Emissions	**19.08**	**34.70**	**3.34**	**1.86**
SCAQMD Local Construction Thresholds[1]	**91**	**664**	**5**	**3**
Exceeds Threshold?	No	No	No	No

Notes:

1. The nearest sensitive receptors to the project site are multi-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25 meter threshold.

Source: Vista Environmental, February 2021. See Section 7.2 of the Vista Environmental report for additional explanation of methodology.

Table III-5 shows that with implementation of Mitigation Measures MM III-1 and MM III-2, none of the analyzed criteria pollutants would exceed the local emissions thresholds during either the demolition or grading phases or the combined building construction, paving, and architectural coatings phases. Therefore, with implementation of Mitigation Measures MM III-1 and MM III-2, a less than significant local air quality impact would occur from construction of the proposed project.

Operational Emissions

Operations-Related Regional Air Quality Impacts

The on-going operation of the proposed project would result in a long-term increase in air quality emissions. This increase in emissions would result from vehicle trips associated with the project (mobile sources); emissions resulting from energy usage (energy sources); emissions from on-site mobile equipment powered by combustion engines (off-road equipment); and the on-site use of consumer products, architectural coatings, and landscaping equipment (area sources). The primary source of project-related emissions is attributed to the increase in exhaust emissions from the project's trucks and passenger vehicles and through operational emissions from the ongoing daily activities by the warehouse/distribution businesses occupying the project site. As noted in the Project Description, the proposed warehouse/distribution facility with ancillary office uses would operate 24 hours a day, 7 days a week. Warehouse operations would include arrivals and departures of trucks and passenger vehicles, activities at 21 truck loading bays, and occasional site maintenance and trash pick-up. Total traffic generation for this analysis is based on the estimated daily trip generation of 1,095 daily vehicle trips (973 trips for non-trucks (e.g., automobiles) and 122 truck trips. Daily vehicle trips associated with the project was calculated using the City of Los Angeles' VMT calculator version 1.3. It is noted that the VMT Calculator determined that the project would result in 1,095 daily vehicle trips; however, this value does not include credits, such as application of required bike parking per the Los Angeles Municipal Code.

With the VMT credit, the project is calculated as having 1,088 daily vehicle trips; however, 1,095 daily vehicle trips is used for this analysis and credit is not taken for the bicycle parking in order to provide a conservative analysis. Further, a credit is available to account for the existing uses on the project site; however, this credit is not taken in order to provide a conservative analysis. Lastly, the trip generation estimate used in this analysis (1,095 daily vehicle trips including 122 truck trips) is greater than a trip generation estimate calculated using land use codes provided in the Institute for Transportation Engineers (ITE) Trip Generation Manual (10th edition). If applicable ITE land use codes were to be applied, Project trip generation would be 908 daily trips with 101 truck trips.[2] Therefore, the project's estimated daily trip generation, as analyzed in this section, represents a conservative analysis of air quality impacts. These daily vehicle trip estimates are detailed in Section 17, Traffic, of this IS/MND. No indoor activities, outdoor storage or other outdoor activities are proposed that could produce air emissions as a by-product.

The following discussion provides an analysis of potential long-term air quality impacts due to regional air quality and local air quality impacts with the on-going operations of the proposed project. The operations-related regional criteria air quality impacts created by the proposed project were analyzed by Vista Environmental using the CalEEMod model using the mobile source, area source, and energy source emissions detailed above. The complete list of input parameters used in this CalEEMod analysis is provided in the air quality report prepared for this Project.

TABLE III-6
OPERATIONAL REGIONAL CRITERIA POLLUTANT EMISSIONS

	Pollutant Emissions (pounds/day)					
Activity	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Area Sources	3.93	0.00	0.04	0.00	0.00	0.00
Energy Usage	0.00	0.04	0.03	0.00	0.00	0.00
Mobile Sources	2.40	27.24	27.62	0.16	9.84	2.76
Off-Road Equipment	0.45	4.22	4.62	0.01	0.28	0.26
Total Emissions	**6.78**	**31.50**	**32.30**	**0.17**	**10.12**	**3.02**
SCQAMD Operational Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Notes:

1. *Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.*
2. *Energy usage consists of emissions from natural gas usage.*
3. *Mobile sources consist of emissions from vehicles and road dust.*
4. *Off-road equipment consists of emissions from forklifts utilized inside the warehouse building which have been conservatively analyzed as CNG-powered, instead of electric-powered.*

Source: Vista Environmental, February 2021.

[2] The *ITE Trip Generation Manual, 10th Edition* provides a rate for warehousing (ITE Land Use Code 150) which would be suitable for a standard warehouse facility. However, to provide flexibility for a potential tenant to use the facility as a last-mile delivery warehouse, the study instead utilizes the rate for a high cube parcel hub warehouse (ITE Land Use Code 156). While the Project would not be a high cube facility, the trip generation rate for a high cube warehouse is higher than for typical warehouses. Thus, the ITE-based trip generation estimate for a high cube parcel hub warehouse yields a greater daily vehicle trip generation rate (and results in a more conservative analysis).

The data provided in **Table III-6Error! Reference source not found.** show that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the proposed project.

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (also referred to as "*Friant Ranch*"), the California Supreme Court held that when an EIR concluded that when a project would have significant impacts to air quality impacts, an EIR should "make a reasonable effort to substantively connect a project's air quality impacts to likely health consequences."

As shown in **Table III-6** above, and unlike the project at issue in the *Friant Ranch* case, the Project's emissions of criteria pollutants would not exceed the SCAQMD's thresholds and would not have a significant air quality impact. Therefore, it is not necessary to connect this small Project's air quality impacts to likely health impacts. However, for informational purposes this analysis considers the Court's direction as follows:

- The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

Although it has been determined that the Project would not result in significant air quality impacts, this analysis details the specific health risks created from each criteria pollutant described above and identified in **Table III-1**. In addition, the specific health risks created from diesel particulate matter are detailed in response to Threshold III-c., below. As such, this analysis meets the part 1 requirements of the Friant Ranch Case.

- The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it states "The Court of Appeal identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of possible adverse health effects. The County could have, for example, identified the Project's impact on the days of nonattainment per year."

Table III-6, above, shows that the primary source of operational air emissions would be created from mobile source emissions, which would be generated throughout the Air Basin and would result in a less than significant impact to air quality. If there were a significant impact, any adverse health impacts created from the proposed project should be assessed on a basin-wide level. As discussed above, the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) were exceeded on one or more days in the SCAB for ozone (O_2), inhalable particulates (PM_{10}), and ultra-fine particulates ($PM_{2.5}$) at most monitoring locations. Thus, the SCAB is in non-attainment for these pollutants. As VOC and NOx are ozone precursors, they have been considered as non-attainment pollutants as well. **Table III-7** shows the Project's daily contribution to these pollutants in the SCAB. Total emissions of these pollutants were obtained from the 2016 AQMP. Since the 2016 AQMP did not calculate total PM_{10} emissions, the total PM_{10} emissions were obtained from *The California Almanac of Emissions and Air Quality 2013 Edition,* prepared by CARB.

TABLE III-7
THE PROJECT'S DAILY CONTRIBUTION TO CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN

	Pollutant Emissions (pounds/day)					
Emissions Source	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Project Emissions[1]	6.78	31.50	32.30	0.17	10.12	3.02
Total Emissions in Air Basin[2]	1,000,000	1,044,000	4,246,000	36,000	322,000	132,000
Project's Percent of Air Emissions	**0.0007%**	**0.0030%**	**0.0008%**	**0.00047%**	**0.0031%**	**0.0023%**
SCQAMD Operational Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
1. *From the Project's total operational emissions shown above in **Table III-6**.*
2. *VOC, NOx, CO, SO_2 and PM2.5 from 2016 AQMP and PM10 from the California Almanac of Emissions and Air Quality 2013 Edition.*

Source: Vista Environmental, February 2021.

As shown in **Table III-7**, the Project would increase daily criteria pollutant emissions by as much as 0.0031 percent for PM_{10} in the South Coast Air Basin. Due to these nominal increases in the Air Basin-wide criteria pollutant emissions, no increases in days of non-attainment are anticipated to occur from operation of the proposed project. As such, this analysis meets the part 2 requirements of the Friant Ranch Case and therefore no further analysis is required. Accordingly, operation of the project is not anticipated to result in a quantitative increase in premature deaths, asthma in children, days children will miss school, asthma-related emergency room visits, or an increase in acute bronchitis among children due to the criteria pollutants created by the proposed project. Impacts would be less than significant.

Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The proposed project has been analyzed for the potential local CO emission impacts from project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following paragraphs analyze the vehicular CO emissions and local impacts from on-site operations.

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the state and federal CO standards of 20 parts per million (ppm) over one hour or 9 ppm over eight hours.

At the time of development of the 1993 Handbook, the Air Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot

analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. Since the nearby intersections to the proposed project are much smaller and carry less traffic than what was analyzed by the SCAQMD, no local CO hotspots are anticipated to be created from the proposed project and no CO hotspot modeling was performed. Therefore, a less-than-significant long-term air quality impact due to CO concentrations would occur with the ongoing use of the proposed project.

Project-related air emissions from onsite sources such as architectural coatings, landscaping equipment, and onsite usage of forklifts and street sweeping machinery could potentially create emissions that exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from onsite operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the methodology described above in the local construction emissions section. **Table III-8** shows the on-site emissions from the CalEEMod model prepared by Vista Environmental, which includes area sources, energy usage, on-site vehicle emissions (mobile sources), and off-road equipment (such as the use of compressed natural gas (CNG) forklifts, and the calculated local emissions thresholds. Natural gas consumption (shown as energy usage in **Table III-8**) associated with appliance use on the project site is not anticipated as part of the proposed project; however, this energy usage is included in the analysis of operations-related emissions in order to provide a conservative analysis, and accounts for potential limited natural gas usage by a future tenant.

TABLE III-8
OPERATIONS-RELATED LOCAL CRITERIA POLLUTANT EMISSIONS

Onsite Emission Source	Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Area Sources	0.00	0.04	0.00	0.00
Energy Usage	0.04	0.03	0.00	0.00
Mobile Sources[1]	0.59	0.60	0.21	0.06
Off-Road Equipment[2]	4.22	4.62	0.28	0.26
Total Emissions	**4.85**	**5.28**	**0.49**	**0.32**
SCAQMD Local Operational Thresholds[3]	**91**	**664**	**1**	**1**
Exceeds Threshold?	No	No	No	No

Notes:
1. *Mobile sources based on 2.2 percent of the gross vehicular emissions, which was calculated based on the percentage of vehicle trips occurring within a quarter mile of the project site (i.e., from CalEEMod, 52% of trips are C-W that are 16.6 miles in length [1.5% of trip within ¼ mile]; 36% of trips are C-NW that are 6.9 miles in length [3.6% of trip within ¼ mile]; and 11% of trips are truck trips that are 40 miles in length [0.6% of trip within ¼ mile]).*
2. *Off-road equipment consists of emissions from forklifts used inside the building, which have been conservatively analyzed as CNG-powered instead of electric-powered.*
3. *The nearest sensitive receptors to the Project Site are site are multi-family homes located adjacent to the east side of the Project Site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25=meter threshold.*

Source: Vista Environmental, February 2021

The project-generated emission levels shown in **Table III-8** indicate that the fully developed and operational Project would not exceed the local NOx, CO, PM_{10} and $PM_{2.5}$ LST thresholds of significance discussed above. Therefore, the proposed project would create a less-than-significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

SCAQMD Thresholds Address Project and Cumulative Impacts

As stated above, SCAB is in nonattainment for ozone, PM_{10}, and $PM_{2.5}$, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (elderly, children, and the sick. The regional analysis detailed above found that the Project would not exceed the SCAQMD regional significance thresholds for VOC and NO_x (ozone precursors), PM_{10}, and $PM_{2.5}$. It is not practical or feasible to attempt a region-wide quantitative assessment of all potential new pollution sources, at any given point in time, to determine the precise quantitative contribution of an individual land use project as an element of the total combined emissions from hundreds of proposed new development, infrastructure, community facilities, etc. that are occurring throughout the air basin. Therefore, the SCAQMD thresholds were established as indicators of a cumulatively considerable contribution to an existing or potential violation of health-based air quality standards.[3] In accordance with SCAQMD methodology, projects that do not exceed SCAQMD's recommended significance thresholds or can be mitigated to less-than-significant levels at a project level do not contribute a cumulatively considerable level of emissions on a regional basis. As discussed above, with implementation of Mitigation Measures III-1 and III-2, the Project's emissions would be below all SCAQMD regional thresholds for the non-attainment pollutants; therefore, the project would not result in a cumulatively considerable contribution of these pollutant emissions within the SCAB either during construction or operation of the Project. Therefore, impacts would be less than significant, with mitigation incorporated.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact With Mitigation Incorporated. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations, have been calculated for both construction and operations and are detailed in **Tables III-4 and III-8** above. These tables show that the proposed project emissions are below the SCAQMD LST thresholds for operation of the project, but not for construction of the project. Emissions of PM_{10} during both demolition and grading activities and $PM_{2.5}$ during grading activities would result in an exceedance of the localized thresholds and would result in a significant impact. Mitigation Measures MM III-1 and MM III-2 have been provided which would reduce local air quality impacts from construction to less than significant levels. While on-going operations of the project may expose sensitive

[3] SCAQMD "uses the same significance thresholds for project specific and cumulative impacts." "Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same." SCAQMD, 2003, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, p. D-3. Available here: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2

receptors to pollutant concentrations of CO emissions from project-generated vehicle trips and air quality impacts of on-site operations, no local CO hotspots are anticipated at nearby intersections (as described above) and the total daily emissions from project operation would not exceed local thresholds identified in **Table III-8**. Therefore, local impacts resulting from construction-related and operation-related Project emissions would be less than significant, with mitigation incorporated.

Toxic Air Contaminants and Health Risk Impacts

In addition to the above-described criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. TACs is a term that is defined under the California Clean Air Act and consists of the same substances that are defined as Hazardous Air Pollutants (HAPs) in the Federal Clean Air Act. Primary sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different TACs, with one of the most important of these, related to health risk, being diesel particulates. Public exposure to TACs can result from emissions from normal operations of industrial processes and vehicle emissions, as well as accidental releases. While TACs are less pervasive in the urban atmosphere than criteria air pollutants, they are linked to short-term (acute) and long-term (chronic or carcinogenic) adverse human health effects. Health risks from TACs are twofold. First, TACs are carcinogens according to the State of California. Second, short-term acute and long-term chronic exposure to TACs can cause health effects to the respiratory system. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources. These health risks are discussed in detail, in the following paragraphs.

According to the SCAQMD CEQA Handbook, any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the proposed project would result in a Hazard Index increase of 1 or greater.

According to SCAQMD guidance, if the proposed project is anticipated to create TACs through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the source of the TAC and the toxicity of the hazardous air pollutant (HAP) should be analyzed through a comprehensive facility-wide health risk assessment (HRA). The primary source of TACs associated with the project would be diesel particulate matter (DPM) generated by heavy equipment operations during construction of the project. DPM is a subset of $PM_{2.5}$ because the size of diesel particles are typically 2.5 microns and smaller. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the construction of the proposed project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment

to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. In addition, Mitigation Measure MM III-2 requires that all off-road diesel-powered equipment (non-street legal), that is greater than 50 horsepower that is used onsite during construction of the project, shall meet USEPA Tier 4 off-road emission standards. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, then the permittee or its contractor shall comply with an off-road equipment plan approved by the City prior to the issuance of grading permits. The off-road equipment plan must demonstrate that the off-road equipment used on-site to construct the project would reduce construction emissions to below SCAQMD thresholds. In short, because construction would require a relatively limited number of heavy-duty construction equipment on the site for a short period of time, the proposed project would not result in a long-term (i.e., 70 year) cancer risk associated with construction period TAC emissions. However, as the project would result in regular presence of diesel-powered trucks on the fully operational project site, a comprehensive HRA analyzing the risk associated with project operation-generated DPM was prepared for the project.

The project's operation would generate TACs from on-site presence of truck traffic and delivery trucks during long-term operation of the project. The TAC impacts to the nearby sensitive receptors, have been analyzed through use of the AERMOD model version 9.9.0. The inputs for this dispersion modeling used for this TAC analysis were based on recommended methodology in the SCAQMD HRA guidance document (Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2003), the California Office of Environmental Health and Hazards Assessment (OEHHA) guidelines (Air Toxics Hot Spots Program Risk Assessment Guidelines, 2015), and SCAQMD's risk assessment procedures (Risk Assessment Procedures for Rules 1401, 1401.1, and 212, 2017). These modeling parameters are fully discussed in the air quality report prepared for this project by Vista Environmental, available as Appendix A of this IS/MND.

The nearest sensitive receptors that may be impacted by the proposed project are multi-family homes located directly east of the project site and single-family homes located as near as 110 feet south of the project site. There are also single and multi-family homes located as near as 1,100 feet north of the project site on the north side of 228th Street and as near as 900 feet east of the project site on the east side of Normandie Avenue. The community surrounding the project site is considered an environmentally disadvantaged community under Senate Bill 535, which targets communities for investment of proceeds from the state's cap-and-trade program to improve public health. Further, the residential uses to the east of the project site are in the Wilmington, Carson, West Long Beach Assembly Bill 617 community, meaning that these residential uses are included within the CARB Community Air Protection Program, which is designed to reduce exposure in communities most impacted by air pollution through air monitoring and community emissions reduction programs. Within the AERMOD model, discrete receptors were placed at 13 representative nearby homes to evaluate health risks to the closest homes near the project site. A figure demonstrating the location of these receptors is available in the air quality report prepared for this project, available as Figure 3 of Appendix A.

Cancer Risks

According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime would contract cancer, based on the use of standard risk-assessment methodology. Cancer risk was calculated in accordance with the OEHHA 2015 and SCAQMD 2017 guidance documents identified above, and is based on a person's breathing rate, age, exposure frequency, exposure duration, and age sensitivity. **Table III-9** provides a summary of the calculated diesel emission concentrations at the nearest sensitive receptors and indicates a calculated cancer associated with these diesel emissions.

TABLE III-9
TAC CANCER RISKS AT NEARBY SENSITIVE RECEPTORS

Sensitive Receptor	Receptor Location		Annual PM10 Concentration (ug/m^3)			Cancer Risk per Million People
	X	Y	2022-2023	2023- 2038	2038-2051	
1	379,329	3,742,868	0.0004	0.0004	0.0004	0.3
2	379,564	3,742,860	0.0004	0.0004	0.0004	0.3
3	379,704	3,742,857	0.0004	0.0004	0.0004	0.3
4	379,871	3,742,736	0.0007	0.0006	0.0006	0.5
5	379,991	3,742,559	0.0008	0.0008	0.0008	0.6
6	379,616	3,742,518	0.0049	0.0048	0.0047	3.6
7	379,695	3,742,454	0.0030	0.0029	0.0029	2.2
8	379,615	3,742,399	0.0032	0.0030	0.0029	2.3
9	379,737	3,742,222	0.0019	0.0015	0.0014	1.3
10	379,615	3,742,279	0.0027	0.0022	0.0021	1.8
11	379,521	3,742,319	0.0041	0.0035	0.0034	2.8
12	379,417	3,742,359	0.0031	0.0029	0.0028	2.2
13	379,337	3,742,402	0.0021	0.0020	0.0020	1.5
					Threshold of Significance	**10**
					Exceed Threshold?	**No**

Notes:

1. *The locations of each Sensitive Receptor is shown above in Figure 7 of the air quality report, prepared by Vista Environmental for the Project.*
2. *The residential cancer risk based on: C_{air} (2022-2023) * 342 + C_{air} (2023-2038) * 362 + C_{air} (2038-2051) * 39.5.*

Source: Vista Environmental, February 2021.

As shown in **Table III-9**, the cancer risk from the proposed project's TAC emissions would be as high as 3.6 per million persons at the multi-family homes located directly east of the project site (sensitive receptor number 6). The Project-related cancer risk from TAC emissions would be

within the SCAQMD's threshold of 10 per million persons. Therefore, the on-going operations of the proposed project would result in a less than significant impact due to the cancer risk from TAC emissions.

Non-Cancer Risks

In addition to the cancer risk from exposure to TAC emissions there is also the potential for TAC exposure to result in adverse health impacts from acute and chronic illnesses. Acute health effects are characterized by sudden and severe exposure and rapid absorption of a TAC. Normally, a single large exposure is involved. Acute health effects are often treatable and reversible. Chronic health effects are characterized by prolonged or repeated exposure to a TAC over many days, months, or years. Symptoms from chronic health impacts may not be immediately apparent and are often irreversible. As stated above, the SCAQMD CEQA Handbook states that a project would be considered to have a significant air quality impact if it has the potential to generate TACs that would result in a Hazard Index increase of 1 or greater.

For acute health impacts, because normally a single, large exposure is involved, the Hazard Index is based on the maximum 24-hour concentrations of PM_{10} at the point of maximum impact (PMI). The PMI is calculated by the AERMOD model described above. The Health Index is calculated by taking this maximum hourly concentration of PM_{10} and dividing it by the acute reference exposure level (AREL). The OEHHA has not assigned an AREL to DPM; however, other TAC emissions associated with diesel exhaust have ARELs assigned to them. In the air quality report prepared for this Project, Vista Environmental calculated a hypothetical AREL for diesel emissions of 2,189 $\mu g/m^3$ by multiplying each TAC with an AREL to its diesel weight fraction and adding the results. A full description of this process is available in the Vista Environmental report The AERMOD model found that the highest 24-hour concentration at the PMI would occur during Project construction and is 0.01289 $\mu g/m^3$ for DPM equivalent acute non-cancer risk emissions. As a result, the acute Hazard Index is 0.000006.[4] Therefore, the Project would result in a less than significant impact associated with non-cancer acute health risks.

For chronic health impacts, the Hazard Index is based on the most impacted sensitive receptor from the proposed project and is calculated by taking the annual average concentrations of PM_{10}, and dividing it by the Reference Exposure Level (REL) for diesel particulate matter, which is the DPM concentration at which no adverse health effects are anticipated. This REL value is established by the California OEHHA as 5 $\mu g/m^3$. The highest annual off-site concentration of PM_{10} is 0.0049 $\mu g/m^3$, located at sensitive receptor 6 (the multi-family homes directly east of the Project Site) during Project construction, as shown in **Table III-9**. Therefore, the Hazard Index is 0.00098, which is less than the SCAQMD hazard index significance threshold of 1.[5] Therefore, the project would result in a less than significant impact associated with non-cancer chronic health risks.

With respect to the Community Air Protection Program (CAPP) (AB 617), each year CARB's governing board (Board) is required to consider selecting communities for participation in the

4 0.01289 $\mu g/m^3$ / 2,189 $\mu g/m^3$ = 0.000006

5 0.0049 $\mu g/m^3$ / 5 $\mu g/m^3$ = 0.00098

CAPP. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first two years of the CAPP (2018 and 2019), the Board selected 13 communities where these focused actions are underway. The project site is not located within a selected community. The area to the east of the project site are in the Wilmington, Carson, West Long Beach AB 617 community. CalEnviroScreen is a general mapping tool developed by the OEHHA to help identify California communities that are most affected by sources of pollution. The project site and its immediately surrounding area are designated by CalEPA as being part of a disadvantaged community for the purpose of SB 535. As previously discussed, SB 535 targets disadvantaged communities in California for investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. The project entails the development of a warehouse building, which would bring jobs and other economic opportunities to the local area without State assistance. Regional emissions associated with operation would be less than significant, and regional emissions associated with construction would also be less than significant. As indicated in the preceding analysis, with incorporation of mitigation measures, the project's construction and operational localized emissions would not exceed the SCAQMD LST thresholds, and the project's operational emissions would not exceed SCAQMD thresholds for increased cancer or non-cancer chronic health risk. The project also would not cause or contribute to any CO "hot spots." Therefore, the project would have a less than significant impact on sensitive receptors, with incorporation of the construction mitigation measures specified herein.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The SCAQMD CEQA Handbook states that an odor impact would occur if a proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states that a person shall not discharge from any source quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons to the public. Therefore, the proposed project would be considered to result in a significant impact if it violated SCAQMD Rule 402 with regard to odor impacts.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that might be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of the development of a warehouse and distribution facility with ancillary office uses. There would be no atmospheric emissions, or any odors released from activities inside the warehouse. Potential exterior sources that could potentially emit odors during the on-going operations of the proposed project would consist of odor emissions from the trash storage area and from operation of diesel equipment. Pursuant to City regulations, permanent trash enclosures with covers that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Diesel truck emissions odors would be generated intermittently from truck loading and unloading activities at the Project Site and would not likely be noticeable for extended periods of time beyond the project site boundaries. Due to the distance of the nearest receptors from the project site (residential land uses located 110 feet east and south of the project site) and through compliance with SCAQMD's Rule 402, no significant impact related to odors would occur during the on-going operations of the proposed project.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis includes findings of the Tree Survey prepared by Psomas (dated September 2020). A copy of this report is available as Appendix C to this IS/MND.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. The project site is located in a fully urbanized area that does not contain any native biological resources or habitat that could support species protected by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The site is zoned M2-1VL, M3-1VL, and MR2-1VL and the General Plan Land Use Designation is Light Manufacturing and Heavy Manufacturing. The site is improved with several structures, surface parking, a go-cart racing track, a miniature golf course, and associated landscaping. These will all be removed as a part of the project. All surrounding land is developed with a commercial, industrial, residential or oilfield land use, and with major streets. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally listed species. Considering the location of the project and the kind of tree(s), development of the project site would not have an 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 CDFW or USFWS, and no impacts would occur.

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

No Impact. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The project site is located in a highly urbanized area, with all surrounding land being fully developed with industrial, residential, commercial, and oilfield land uses. The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. As noted in the preceding response, there are no native biological resources and no natural communities on or near the project site. Therefore, the proposed project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS, and no impacts would occur.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. As mentioned previously, the project site is in a highly urbanized area,

completely surrounded by industrial, residential, commercial, and oilfield land uses. The project site does not contain any aquatic resources or any surface or groundwaters supporting such resources. As such, there are no state or federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. Therefore, the proposed project would not have any effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means, and no impact would occur.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. As noted in the previous responses, the project site is completely disturbed by past land uses and is located in a fully urbanized area. Due to the extensive development and lack of natural communities in this area, and a busy street network between land uses, this area does not support movement of wildlife or fish species through or between areas that contain wildlife or fish habitat.

An inventory of onsite trees was conducted by Psomas (see Appendix C), which identified 141 trees throughout the project site, none of which are of the species that are protected by City Ordinance. The onsite trees and shrubs provide potential nesting opportunities for a variety of birds and raptor species, some of which may be protected under the federal and/or state Migratory Bird Treaty Acts (MBTAs). The nesting season is generally defined as February 15 through September 15 for songbirds and January 15 to August 31 for raptors. Project construction activities involving removal of the existing trees and other landscaping could potentially disturb or destroy active migratory bird nests, including eggs and young. Disturbance or destruction of migratory bird eggs, young, or adults is in violation of the MBTA and is considered a significant impact. Such impacts would be avoided through regulatory compliance measures that would result in implementing the provisions of the MBTAs. These measures would be in the construction specifications that are identified in the project's building permits, as follows. If construction cannot be scheduled outside of the general bird and raptor nesting seasons, a qualified biologist would perform a preconstruction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the Migratory Bird Treaty Act and California Fish and Game Code. The results of the preconstruction survey would be documented by the qualified biologist. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities would be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no construction would be allowed within 300 feet-500 feet, depending on the species of the active nest, until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The qualified biologist may reduce the buffer or propose other recommendations based on what is determined to not cause disturbance to nesting birds.

With these regulatory compliance measures, significant impacts to bird and raptor species protected under the MBTA and California Fish and Game Code would be avoided and the project's impact would be less than significant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. The proposed project would not conflict with any policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance (No. 177,404). A complete tree inventory was conducted at the project site, which determined that there are 141 total trees within the site and along the street frontage (Appendix C). The highest numbers of tree species include Canary Island pines (42), Indian laurel fig (13) and 56 queen palms. There are no trees that are classified as a protected species, as defined in Section 17.02 of the Los Angeles Municipal Code. Specifically, there are no Southern California black walnuts, no oak trees, no California bay laurels, or any western sycamores. All of the existing trees are ornamental species planted as part of the former Mulligan's family fun center as part of the design character for that land use. Additionally, no off-site street trees are proposed for removal. A total of 111 new trees are proposed on-site, including along the site perimeter and within the parking areas. Therefore the Project would be consistent with the City's Protected Tree Ordinance and regulations applicable to tree removal. Removal of existing trees, as proposed, would not impact trees that are recognized as an important local biological resource. As noted in the preceding response, the proposed project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CDFW protects migratory birds that may use trees on or adjacent to the project site for nesting, and may be disturbed during construction of the proposed project. As such, the project would not have a significant impact on locally protected biological resources.

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

No Impact. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As identified in Exhibit B3 of the City of Los Angeles General Plan, Conservation Element, the project site is not located in any sensitive ecological or coastal resources area. Therefore, the proposed project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Information and analysis in the following responses are based on research consisting of: a California Historical Records Information System ("CHRIS") records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on September 14, 2020, a Sacred Lands File Search completed on October 15, 2020, a literature review, historical society consultation, historical map review, a desktop built environment survey, and an analysis of historic context conducted by a cultural resource specialist with Michael Baker International (dated October 14, 2020). The research is documented in Appendix D of this IS/MND.

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially alter the environmental context of, or remove identified historical resources. At the beginning of the historic period, the Project location is understood to be within the ancestral territory of the Gabrielinos, though no Gabrielino villages are known within the vicinity of the Project Site. The Gabrielino Indians are named because of their association with the Mission San Gabriel Arcángel, located approximately 22 miles northeast. Generally, their territory included all of the Los Angeles Basin, parts of the Santa Ana and Santa Monica Mountains, along the coast from Aliso Creek in the south to Topanga Canyon in the north, and San Clemente, San Nicolas, and Santa Catalina Islands. The Gabrielino spoke a dialect of the Cupan group of the Takic language family.

The Project Site and surroundings are within Rancho San Pedro, the first Spanish land grant in California as shown on the 1784 *diseño*, or sketch map for the rancho. No potential resources are depicted within the Project Area at this early date, on a later *diseño* from 1834, nor on maps until the late nineteenth/early twentieth centuries. The initial development on the Project Site started as early as 1924 as three oil wells were depicted in the Project Area.

Aerial photos from 1941 illustrated only one oil well, as well as a small rectangular building. By 1964, three small, square buildings and an irregularly shaped building are depicted within the Project Site. This view was modified by 1971 as one irregularly shaped building, a structure, and a parking lot on the Project Site. The Project Site and surrounds are completely developed by the mid-1970s. The Project Site remained developed with the irregularly shaped building, the structure, and parking lot until circa 2003, when the building was demolished and replaced with additional improvements to the amusement center.

The records search, literature review, historical society consultation, historical map review, and survey revealed no historic or prehistoric resources on the Project Site or within a quarter mile of the Project Site. While no historic resources were revealed on the Project Site, the concrete batch plant structure was built in 1963 and was subsequently evaluated for potential significance under the criteria established for listing in the National Register and the California Register. It was deemed not eligible for listing in either register, as discussed below, and assigned a 6Z status code on the California Department of Recreation (DPR) assessment form 523A to identify this determination. The Mulligan Family Fun Center, which ceased operations in February 2020, was established in 1993 and is well below the 45+ years of age that would warrant evaluation for historic significance under National or California Register criteria.

The batch plant structure was constructed with an irregular ground plan, slab concrete foundation, sheet metal wall cladding, and flat roof. The structure also includes a multi-story conveyor on the north elevation and a mixing station on the north and east elevations. The structure does not appear eligible for listing in the National Register under Criterion A or the California Register under Criterion 1 because it does not appear to have achieved local, state, or national levels of significance within the themes of commercial development. The structure does not appear eligible for listing in the National Register under Criterion B or the California Register under Criterion 2 because it does not appear to be associated with persons significant in our past. The structure does not appear eligible for listing in the National Register under Criterion C or the California Register under Criterion 3 because it lacks architectural distinction, it is not associated with a master architect or builder, and it does not possess high artistic value. Finally, the structure does not appear eligible for listing in the National Register under Criterion D or the California Register under Criterion 4 because it is not likely to yield valuable information which will contribute to our understanding of human history because the structure is not and never was the principal source of important information pertaining to subjects such as commercial buildings. The complete assessment, documented with DPR Form 523A, is provided in Appendix D.

No significant resources have been identified on the Project Site. Therefore, construction and operation of the Project would not cause a significant impact to historic resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute

unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

As noted in the prior response, a records search revealed no historic or prehistoric resources on the Project Site or within a quarter mile of the Project Site. The division of prehistory into temporal periods provides a framework for understanding culture change in years before present (BP). The earliest inhabitants to the Los Angeles Basin occurred in the Paleocoastal or Paleoindian Period terms, indicating proximity to the coast and is generally dated between 13,000 and 8,500 BP. These earliest inhabitants were highly mobile hunter gatherers. Warren and others redefined the Millingstone Horizon as the Encinitas Tradition, which dates to between 8,500 and 3,500 BP. Encinitas is a widespread cultural phenomenon distinguished by an abundance of manos and metates and a dearth of vertebrate faunal remains, projectile points, and mortar and pestle groundstone tools. Definitions of the Intermediate Period and Late Prehistoric Period continue to be employed as temporal periods as Wallace defined them through understanding of cultural practices, technology, and migrations among other aspects has been thoroughly deepened.

The SCCIC records search reviewed several federal and California inventories. The search of these inventories revealed no prehistoric cultural resources within the Project Site or within a quarter-mile of the Project Site. While no cultural resources studies have been completed in the project location, one was completed within the quarter-mile search area, but no resources were found.

Due to existing disturbances, the Project Site has a low potential for the discovery of archaeological resources. Since the grading activities could disturb native soil materials, there is some possibility that unknown cultural resources could be encountered and could be damaged by earth moving activities. Impacts will be avoided through implementation of the City's standard condition of approval for inadvertent discovery of archaeological resources during earth moving activities, as follows:

> Archaeological Resources Inadvertent Discovery. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. Human remains could be

encountered during excavation and grading activities associated with the proposed project. While no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur within the project area, there is always a possibility that human remains can be encountered during construction. Research on past land uses, a review of the site history, and a review of the cultural records search conducted at the SCCIC as discussed in threshold a), above, did not provide any indication of human burial occurring within the Project Site. Given the extensive level of site disturbance by past land use and development activities, it is considered unlikely that there are any human remains located onsite. However, a potential to uncover human remains during ground-disturbing activities may exist.

California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within a Project Site, disturbance of the Site must halt until the county coroner has conducted an investigation into the circumstances, manner, and cause of any death, and has provided recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative. If the coroner determines that the remains are of Native American descent, he or she is required to notify the California Native American Heritage Commission (NAHC) within 24 hours. The NAHC would then identify the person(s) thought to be the Most Likely Descendant of the deceased Native American, who would have 48 hours from notification by NAHC to inspect the site of the discovery of Native American remains and to recommend to the applicant or landowner means for the treatment and disposition of the human remains and any associated grave goods. Construction contractors would be required to adhere to the provisions of California Health and Safety Code 7050.5, which would provide sufficient safeguards to avoid accidental or intentional destruction of human remains that may be uncovered during site construction activities. Therefore, with compliance of the California Health and Safety Code Section 7050.5, project impact would be less than significant. Please note that further information on procedures to be followed in the event that Native American burial remains are discovered, is provided in the response to XVIII.b, later in this Initial Study.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Please note that calculations of the project's energy usage presented in this section were made with current, industry-standard computing applications, as described in Section 6.2 of the Air Quality, Energy, and Health Risk Assessment Impact Analysis, Bridge Point South Bay VII Project prepared by VISTA Environmental, Inc., included as Appendix A of this Initial Study.

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity and petroleum-based fuels and related distribution systems. The following paragraphs discuss energy consumption associated with short-term Project construction and long-term Project operation. Project-related energy consumption estimates are discussed in the context of Los Angeles County-wide energy consumption; however, this comparison is provided for contextual purposes only and is not meant as significance determination.

Construction

Electricity

Electrical power would be used during construction for a variety of tools and possibly for night lighting, at various times. The electricity could be obtained from existing electrical lines in the vicinity of the Project Site, from diesel or gasoline powered generators, or from battery packs, depending on the size and application of the tools or machinery involved. The amount and rate of electricity consumed would vary throughout the construction period based on the construction activities being performed. This would be limited to activities that require electrical power and thus would not result in wasteful or inefficient consumption of electricity. This electricity demand would be nominal and would cease upon the completion of construction. Overall, the proposed project's construction activities would require limited electricity consumption and would not have an adverse impact on available electricity supplies and infrastructure. Therefore, impacts would be less than significant.

Natural Gas
Natural gas would not be required for any construction activities; therefore, there would be no construction-related impacts involving natural gas services.

Petroleum Fuel Use
Petroleum-based fuel usage represents the largest source of energy potentially consumed during project construction. Both off-road machinery operating on the project site and on-road vehicles transporting workers and trucks transporting equipment and supplies, would utilize petroleum-based fuel.

With on-road fuel usage estimated at 25,595 gallons and off-road fuel usage estimated at 79,907, the project's construction would use approximately 105,501 gallons of petroleum-based fuel. This equates to 0.0027 percent of the gasoline and diesel fuel consumed annually by vehicles in Los Angeles County.

Construction machinery and vehicles must adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. To be cost efficient, operators of machinery and vehicles would use that equipment only as needed and would use the most efficient routes to and from the project site, to minimize fuel consumption. Further, as described previously in Section III, Air Quality, the project would implement Mitigation Measure MM III-2, which would further reduce emissions by requiring all off-road diesel-powered equipment (non-street legal) greater than 50 horsepower that are used onsite during construction of the project would meet USEPA Tier 4 Final off-road emission standards (or the highest Tier that is reasonably available). Construction equipment that meets Tier 4 emissions standards emit particulate matter and NO_x at levels in excess of 95 and 90 percent (respectively) below lower tiers of equipment from the early 2000s (USFR 2004). This measure is further discussed in Section III, Air Quality, of this Initial Study. As such, construction-related fuel consumption would not result in wasteful, inefficient, and unnecessary consumption of energy resources and impacts would be less than significant.

Operations

Electricity
Los Angeles Department of Water and Power (LADWP) provides electrical services in the City of Los Angeles, including the Project Area. LADWP's electricity supply is obtained through several types of energy resources including 32 percent from renewable resources, 18 percent from coal, 30 percent from natural gas, 3 percent from large hydroelectric sources, 10 percent from nuclear power, and 6 percent from unspecified power sources (LADWP 2018). There is existing electrical transmission infrastructure in the project vicinity that would be connected to for the project's electrical service. The Proposed Project would consume electricity for interior and exterior lighting, heating and cooling systems, a variety of electrical appliances and office machinery, electrical vehicle charging infrastructure, and for outdoor irrigation system controls. The total estimated consumption for the Project would be 598,220 kilowatt-hours per year; this equates to 0.0027 percent of the electricity produced annually by LADWP.

Project design and construction would comply with all City building standards related to building energy efficiency, including CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11 *California Green Building Standards*. These regulations require numerous energy efficiency measures to be incorporated into the proposed warehouse, including minimum efficiency standards for insulation, lighting, appliances, water and space heating and cooling equipment, and roofing. Compliance with these measures, which are among the most stringent in the country, would ensure that the project does not consume electricity in a wasteful or inefficient manner. Therefore, it is anticipated that the Proposed Project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the Proposed Project's electricity demand. Thus, the project would not result in the wasteful or inefficient use of electricity and impacts would be less than significant.

Natural Gas

Although the project would not include any connections to natural gas infrastructure, it is possible that there could potentially be a tenant that requires consumption of natural gas. With standard CalEEMod default settings for this type/size of land use, the project would consume 152 mega British Thermal units (MBTU) per year of natural gas associated with heating and/or appliances used on site. This equates to 0.00005 percent of the natural gas consumed annually in Los Angeles County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County. As stated above, the project would comply with all Federal, State, and City requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards.* The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed warehouse, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Thus, Project operations would use limited amounts of natural gas and impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Transportation Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site.

Vehicular travel would consume 175,648 gallons of petroleum fuel per year. This equates to 0.0044 percent of the gasoline and diesel consumed annually in Los Angeles County. This warehouse would operate similar to other shipping-based warehouses, including last mile delivery warehouses in the Los Angeles Basins. Trucks would follow existing truck routes and the project would not have characteristics that would result in inefficient or wasteful consumption of transportation fuels. As noted in the Project Description section of this Initial Study, the proposed project includes electrical vehicle charging infrastructure on site to support electrically powered automobiles and potentially electrically powered trucks in the future. Permanent and short-term bicycle parking would also be provided. As stated in the Project Description, the proposed warehouse building would not include cold storage. Together, this would reduce consumption of petroleum fuels for transportation purposes. Additionally, the project applicant has committed to

implementing additional BMPs which would require all non-street legal equipment (such as forklifts and street sweepers) used onsite to be powered by alternative fuels or electric batteries.

As such, the project would consume less transportation-related petroleum-based fuel than a similar warehouse use that does not implement these measures. Thus, impacts with regard to transportation energy supply and infrastructure capacity would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The applicable energy plans for the proposed project include Green LA, adopted May 2007; Climate LA, approved 2008; City pLAn, adopted in 2015; and LADWP's 2017 Power Strategic Long-Term Resource Plan (SLTRP). All of these plans have City-wide strategies that promote energy conservation in new development projects. The proposed project would be required to adhere to all of the applicable energy conservation regulations that have been implemented as a result of the above plans. The project would also be consistent with various statewide and regional plans and regulations aimed at reducing greenhouse gas emissions, through strategies that would enhance energy efficiency through land use and transportation actions. Please refer to the discussion of project consistency with these GHG plans and programs in Section VIII. Greenhouse Gas Emissions.

Major objectives for enhancing energy efficiency and expanding the supply of renewable energy resources to LADWP customers that are identified in the SLTRP include:

- 33 percent renewable portfolio standard (RPS) by 2020, 50 percent RPS by 2025, 55 percent RPS by 2030, and 65 percent RPS by 2036;
- 900 megawatts (MW) local solar by 2025 and 1,500 MW local solar by 2035;
- Doubling of energy efficiency from 2017 through 2027;
- Early replacement of electricity derived through coal-powered plants;
- 404 MW of energy storage by 2025;
- Fuel switching/electrification of the transportation sector;
- Replace aging infrastructure components.

Climate LA targets an increase in the use of renewable energy to 35 percent by 2020, reduction in the use of coal-fired power plants and present a comprehensive set of green building policies to guide and support private sector development. These measures include use of LED lighting, increased use of renewable energy, and increased solid waste diversion.

LA's Green New Deal, the City's first update to the City pLAn, was adopted in 2019. It is a program of actions meant to create sustainability-based performance targets through 2050 that are designed to advance economic, environmental, and equity objectives. One of the key aspects to LA's Green New Deal is climate mitigation, which has co-benefits with respect to energy conservation and expanded use of clean and renewable energy sources, as follows:

- Reduce GHG emissions through near-term outcomes;
- Reduce potable water use by 22.5 percent by 2025, 25 percent by 2035, and maintain or further reduce 2035 per capita water use through 2050;
- Reduce building energy use per square feet for all building types by 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050;

- All new buildings will be net zero carbon by 2030 and 100 percent of all buildings will be net zero carbon by 2050;
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050;
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030;
- Eliminate organic waste going to landfill by 2028.

Through mandatory compliance with the L.A. Green Building Code (L.A.M.C. Chapter IX, Article 9), amended in 2019 through Ordinance No. 186,488, the Project will achieve the City's objectives for building energy efficiency.

Compliance with the City's Green Building Code standards includes compliance with the 2019 update of the California Code of Regulations Title 24 Part 6, also known as the Building Energy Efficiency Standards. These standards are designed to achieve a 30 percent reduction in building energy usage, compared to construction designed in accordance with the 2016 Standards, due mainly to increases in lighting efficiency (CEC 2018). The 2019 Standards also encourage use of battery storage, heat pump water heaters, require more widespread use of LED lighting, improvements to the building's thermal envelope through high performance attics, walls, and windows, and improvements to building ventilation systems.

Proposed project features that would enhance energy efficiency and use of renewable energy sources include:

- 17 car parking spaces with electric vehicle (EV) chargers;
- 32 car parking spaces will be EV-ready, meaning that electrical conduits will be installed from an electrical room on site to the parking space;
- 8 parking spaces will be designated for "clean air" vehicles;
- All truck loading docks will be EV-ready; and
- Designated bicycle parking areas, including 19 long-term spaces within the building and 19 outdoor spaces for short-term use

The project's compliance with the L.A. Green Building Code would be ensured through the submittal of detailed plans to the Los Angeles Department of Building and Safety, who will ensure that all energy efficiency standards are met. Building permits will not be issued and occupancy will not be allowed, unless satisfactory demonstration of compliance with these standards is provided. Adherence to the City's energy efficiency standards, as noted above, ensures that the proposed project would not conflict with or obstruct a plan for renewable energy resources or energy efficiency.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis is based on the findings of the Geotechnical Investigation report prepared by Leighton Consulting, Inc. dated September 2020. The report was reviewed and accepted by the Los Angeles Department of Building and Safety, as provided in the Geology and Soils Report Approval Letter dated February 25, 2021 (Log No. 115712-01). A copy of this report and letter is available as Appendix E to this IS/MND. A Grading Plan prepared by WestLand Group, Inc (dated September 21, 2020) is provided as Appendix F to this IS/MND. Additionally, the paleontological resources analysis is based on the findings of a Natural History Museum of Los Angeles (NHMLA) paleontology collection records search for locality and specimen data on September 7, 2020. A copy of the paleontological records search results is included in Appendix D of this IS/MND.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the project site and if the project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to the California Department of Conservation Special Studies Zone Map, the project site is not located within an Alquist-Priolo Special Studies Zone or Fault Rupture Study Area. The proposed project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy.

A preliminary geotechnical investigation and report was prepared for this project and is provided as Appendix E to this Initial Study (Leighton, September 2020). Research conducted for that investigation determined that no active faults have been mapped on or trending toward the site. The nearest earthquake faults are:

- Palos Verdes Fault – 2 miles south
- Compton Thrust – 3.2 miles northeast
- Newport-Inglewood – 5.5 miles east

Based on this finding, the potential for future surface rupture of active faults onsite is considered to be very low. Impacts would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, development of the proposed project could expose people and structures to strong seismic ground shaking. As part of the geotechnical investigation and report prepared for this project (Leighton, September 2020, see Appendix E) an evaluation of potential seismic ground shaking was conducted, in accordance with the methodology and design

parameters specified by the California Geologic Survey, Chapter 2 of Special Publication 117a, and by the 2019 California Building Code (CBC). The proposed project, like all new development projects in the City, must be designed in accordance with those standards for issuance of building permits. The proposed project would be designed and constructed in accordance with State and local Building Codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with the City's existing building permit procedures, which includes application of the appropriate seismic design criteria to mitigate the effects of seismic ground shaking, would reduce potential impacts to less than significant. As such, no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles CEQA Thresholds Guide, a significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine-to-medium grained, cohesionless soils. As the shaking action of an earthquake progresses, the soil grains are re-arranged and the soil densifies within a short period of time. Rapid densification of the soil results in a buildup of pore-water pressure. When the pore-water pressure approaches the total overburden pressure, the soil reduces greatly in strength and temporarily behaves similarly to a fluid. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

As part of the geotechnical investigations and report prepared for this project (Leighton, September 2020), an assessment of potential liquefaction problems was conducted. It was determined that the project site is not mapped in a zone of required investigation on the California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone map for the Torrance Quadrangle and that shallow groundwater conditions are not expected at the site. Based on the dense nature of the soil and the absence of shallow groundwater, the subsurface soils are not considered susceptible to liquefaction. As such, potential impacts due to liquefaction on site would be less than significant. The project would have no effects that could induce or aggravate potential liquefaction problems on surrounding properties.

During a strong seismic event, seismically induced settlement can occur within loose to moderately dense sandy soil due to reduction in volume during and shortly after an earthquake event. Settlement caused by ground shaking is often nonuniformly distributed, which can result in differential settlement. As part of the geotechnical investigations and report prepared for this project (Leighton 2020), an analysis of potential seismically-induced settlement was conducted, considering the maximum considered earthquake (MCE) and peak ground acceleration. The results indicated that onsite soils are susceptible to low seismic settlement (1.2 inches or less, with differential settlement of 0.6 inch over a horizontal distance of 40 feet). The slabs-on-grade will be designed by the structural engineer in accordance with the current CBC and considering the potential for liquefaction and seismic settlement. Furthermore, the applicant submitted a

geology and soils report to the Department of Building and Safety for review. The Building and Safety, Grading Department issued a Soils Approval Letter dated February 25, 2021 (Log Reference No. 115712-01, see Appendix E) and their conditions are incorporated herein, by reference. Based on this analysis, the project would result in less than significant impacts involving seismically induced settlement.

iv. Landslides?

No Impact. A significant impact would occur if the proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. Landslides result from sudden collapse of sloping land due to seismic ground shaking and sometimes more slowly, due to localized conditions such as high groundwater and unstable soil materials. There are no substantial slopes within the project site in the existing condition and the proposed grading plan would achieve a more even topographic profile, without any substantial slopes. The site is not listed on the California Department of Conservation's Landslide Inventory (DOC 2021). Furthermore, the project would include excavation and earthwork that would replace unstable materials with properly engineered materials, where needed, to meet City standards for foundation design and stability. As such, the project would not result in any impacts involving landslides.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Construction of the proposed project would result in ground surface disturbance during site clearance, excavation, and grading, which could create the potential for soil erosion to occur. Based upon a review of the pertinent geotechnical literature and subsurface investigations conducted by the project's geotechnical consultant, it was determined that the site is underlain by alluvial soil deposits mantled with artificial fill, which reaches depths of up to 7 feet in the central and southern areas.

During the grading period, open and uncovered soil areas would be temporarily exposed to potential erosive forces of wind and stormwater. This potential impact would be fully mitigated through adherence to the City's standard grading and erosion control standards and compliance with the conditions of the Construction General Permit administered by the Los Angeles Regional Water Quality Control Board. This will include submittal of an erosion control plan with specific control measures, and a Stormwater Pollution Prevention Plan, which are discussed in the responses to Checklist items X.a and X.c, later in Hydrology/Water Quality section of this Initial Study. In addition, all onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, and conditions imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter dated February 25, 2021 (Log Reference No. 115712-01, see Appendix E).

Approximately 76 percent of the site is currently covered by impervious surfaces, where erosion is not possible, and the rest is either bare ground or covered by landscaping. The proposed grading plan would disturb and rearrange the entire ground surface, with engineered treatments for all near surface materials to achieve the stability standards required by the City's building code. Total impervious surface area would increase from the existing condition, to 92 percent of

the site, and landscape materials would be planted in the remaining areas (WestLAND Group, Inc. September 2020). This would reduce the potential for soil erosion compared to existing conditions and the potential for any soil erosion with the full site improvements in place would be negligible. The project would result in less than significant impacts involving soil erosion or loss of topsoil.

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. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. Development of the proposed project would not have the potential to expose people and structures to seismic-related ground failure, including liquefaction and landslide; see Section VII a(iii) and Section a(iv) for these issues. Soil compressibility refers to a soil's potential for settlement when subjected to increased loads, such as from a fill surcharge. Based on the findings of the geotechnical investigations conducted for this project, the undocumented artificial fill and upper layer of native soils are slightly to moderately compressible. The proposed grading plan would remove these materials and replace them with suitably engineered soil materials, which would sufficiently mitigate the existing unstable conditions.

Collapse potential refers to the potential settlement of a soil under existing stresses, when wetted. Based on soil testing conducted as part of the project geotechnical investigations, the onsite soils are anticipated to have a negligible collapse potential when inundated with water, resulting in less than significant impacts involving collapsible soils.

As noted in the prior response to Section VII a(iii), the onsite soils are not susceptible to liquefaction and no significant impacts are anticipated due to potential liquefaction conditions. As noted in the prior response to Section VII a(iv), there are no significant slopes on or near the project site and there is no potential for landslides, in existing or proposed conditions.

Depending on the site topography, modes of seismically induced lateral ground displacement associated with soil liquefaction consist of ground oscillation (typically with ground slope less than 0.3 percent), lateral spread (typically with 0.3 to 5 percent ground slope), or flow failure (typically ground slope greater than 5 percent). Because liquefaction is not considered a hazard at the site, seismically induced lateral ground displacements are also not considered to be hazards at the site.

Regional ground subsidence generally occurs due to rapid and intensive removal of subterranean fluids, typically water or oil. It is generally attributed to the consolidation of sediments as the fluid in the sediment is removed. The total load of the soils in partially saturated or saturated deposits is born by their granular structure and the fluid. When the fluid is removed, the load is born by the sediment alone and it settles. No reports of regional subsidence have been documented in the site vicinity, and lack of intense removal of significant quantities of water or oil extraction in the area makes the potential for ground subsidence very low. The proposed project would not result

in any groundwater extraction, any oil extraction, or other withdrawal of subsurface fluids and would not result in any impacts involving subsidence.

The proposed project would be required to implement standard construction practices that would ensure that the integrity of the project site and the proposed structures is maintained. Construction will be required by the Department of Building and Safety to comply with the City of Los Angeles Uniform Building Code (UBC) which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of the Building Code requirements and the Department of Building and Safety's Soils Report Approval Letter when issued/dated February 25, 2021 (Log Reference No.115712-01, see Appendix E), the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less-than-significant.

d. Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. A significant impact would occur if the proposed project would be 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. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subjected to large uplifting forces caused by the swelling. Without proper measures taken, heaving and cracking of building foundations and slabs-on-grade could result.

An analysis of the near surface soils where the building foundation would be placed was conducted as part of the geotechnical investigations and report prepared for this project. Based on laboratory testing of soil borings taken on site, it was determined that the onsite soil materials have very low to low expansive characteristics. The proposed project would be required to comply with the requirements of the UBC, LAMC, and other applicable building codes. Compliance with such requirements would reduce impacts related to expansive soils, therefore potential impacts involving expansive soils would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to the City of Los Angeles' municipal sanitary sewer system and all wastewater generated in the warehouse would be discharged into that system. No septic tanks or alternative wastewater disposal systems are proposed. As such, there would be no impact involving any soil based wastewater disposal systems.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. Paleontological resources are "fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information," (SVP 2010). Research on paleontological resources was conducted through a paleontological resources records search from the NHMLA (Appendix D) and supplemental research to identify paleontological sensitivity of the project area by Michael Baker International specialists.

The geology of the Torrance area has been mapped by Dibblee et al. (1999) at a scale of 1:24,000. Older surficial sediments (Qos) from either the Palos Verdes Sands or an unnamed formation underlie the Project. These sediments consist of stabilized dune and drift sand made of unconsolidated fine-grained sand broadly dating to the Pleistocene epoch.

The NHMLA completed a paleontology collection records search for locality and specimen data on September 7, 2020. The records search showed no previously identified fossil localities within the project area. As shown in Table VII-1, five fossil localities from the same sedimentary deposits as the project site occur nearby, either at the surface or at depth. Michael Baker International conducted a supplemental investigation within 3 miles of the project site using the online University of California Museum of Paleontology collections, Paleobiology Database, FAUNMAP. No fossil localities were located within 3 miles in the supplemental FAUNMAP search.

TABLE VII-1
NHMLA RECORDS SEARCH RESULTS

Locality Number	Location	Formation	Taxa	Depth
LACM VP 3823	SE corner of Figueroa St. & Sepulveda Blvd.	Unidentified (Pleistocene; grey buff arenaceous silt)	Camel family (Camelidae)	12-14 ft bgs
LACM VP 3085	Intersection of Lomita Blvd. & Main St.	Palos Verdes Sand	Fish (Condrichthyes); rays (Myliobatoidea); toothed whale (Odontoceti); invertebrates (Mollusca)	Unrecorded (collected during excavations for sewer outfall)
LACM IP 21125	Just north of the intersection of Western Ave. & Torrance Blvd.	Unrecorded (Pleistocene)	Invertebrates	Unrecorded

Locality Number	Location	Formation	Taxa	Depth
LACM IP 1186 & 4807	South of the Intersection of Vermont Ave. & Sepulveda Blvd.	Palos Verdes Sand	Invertebrates (including *Tarus peralis*)	Unrecorded
LACM VP 4129	South of 223 St. and west of Alameda St.	Undetermined (Pleistocene sand)	Elephant family (Proboscidea); camel family (Camelidae)	24 feet bgs

Source: NHMLA 2020.

Notes: VP – Vertebrate Paleontology; IP – Invertebrate Paleontology; bgs – below ground surface

The climate of Southern California during the Pleistocene was cooler and moister than the modern Mediterranean climate. In contrast to the harsh, cold conditions in high latitudes near the ice sheets, Southern California experienced a relatively milder climate during this time. During this time, familiar Pleistocene or "Ice Age" fauna, such as mammoth, mastodons, horses, camelids, and ground sloths, inhabited the area.

The project area is considered to be highly sensitive for fossil bearing deposits within intact deposits. It is underlain with a highly sensitive Pleistocene age formation (either unidentified or Palos Verdes Sands) and known fossil localities are immediately adjacent to the Project Area. The proposed depth of ground-disturbing activities has a moderate potential to disturb paleontological resources due to the variable depth of intact alluvium underneath the fills documented in the geotechnical borings. Since the grading activities could disturb native soil materials, there is some possibility that paleontological resources could be encountered and could be damaged by ground-disturbing activities. Impacts will be avoided through implementation of the City's standard requirement for inadvertent discovery of paleontological resources during earth moving activities, as described below.

Paleontological Resources Inadvertent Discovery**.** In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Michael Baker International, Inc. prepared calculations of the Project's Greenhouse Gas (GHG) emissions (November 2020) and an assessment of potential environmental impacts resulting from those emissions that is presented in the responses that follow. GHG inventory calculation worksheets can be found in Appendix B of this IS/MND.

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The response to this threshold question is provided as part of the discussion under threshold b), below, to provide a comprehensive analysis of both thresholds as a single narrative.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

Over the last few decades, changes in the global climate, such as temperature increases and sea level rise, have accelerated. There is strong consensus amongst most of the scientific community that these changes are the probable result of man-made GHG emissions. Changing climatic conditions as a consequence of excess GHGs in the atmosphere may cause unique impacts on California and the City of Los Angeles, including higher energy bills, increases in the number of extreme heat days and related health problems, extended drought, and sea level rise.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Nor have the SCAQMD, OPR, CARB, CAPCOA or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that the City has adopted that would be applicable to the Project. Since the City has not adopted any numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such

plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment, consistent with CEQA Guidelines section 15064.4.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using the California Emissions Estimator Model (CalEEMod), as recommended by SCAQMD and other air pollution control agencies throughout the state. The primary purpose of quantifying the project's emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good faith effort to describe and calculate emissions. The estimated emissions inventory is used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

1. Project Consistency with Applicable Plans and Policies.

Greenhouse gas emissions are addressed through the efforts of various state, regional, and local government agencies, who work jointly, as well as individually, to reduce GHG emissions through legislation, regulations, planning, policy-making, education, and a variety of programs. Specifically, the following paragraphs demonstrate whether the project would conflict with State (the California Air Resources Board (CARB) Scoping Plan), regional (SCAG's 2020-2045 RTP/SCS), and local (City of Los Angeles Green LA Plan and the Green New Deal: Sustainable City pLAn) plans, policies, and regulations.

State

CARB, which is a part of the California Environmental Protection Agency, has the primary responsibility for implementing state policy to address global climate change and is responsible for the coordination and administration of both the federal and state air pollution control programs within California. In addition, CARB establishes emission standards for motor vehicles, consumer products (e.g. hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment, as well as setting fuel specifications to further reduce vehicular emissions.

In 2006, the California legislature enacted Assembly Bill (AB) 32, the California Global Warming Solutions Act. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, CARB must adopt regulations requiring the reporting and verification of Statewide GHG emissions from specified sources, as well as rules and regulations to achieve feasible and cost-effective GHG emission reductions. In 2008, CARB adopted the *Climate Change Scoping Plan: A Framework for Change* (Scoping Plan) in accordance with Health and Safety Code Section 38561. Additionally, the California Governor issued Executive Order B-30-15 on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. Assembly Bill 197 (AB 197) (September 8, 2016) and Senate Bill 32 (SB 32) (September 8, 2016) codified into statute the GHG emissions reduction targets of at least 40 percent below 1990 levels by 2030 as detailed in Executive Order B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities

The Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs emissions (CARB 2008). Accordingly, for the purpose of the analysis below, the Scoping Plan comprises the original 2008 Plan and the 2014 and 2017 updates. Under the Scoping Plan, there are several State regulatory measures aimed at the identification and reduction of GHG emissions. Most of these measures focus on reduction or replacement of area source emissions produced by combustion of fossil fuels to generate electricity or provide space and water heating with natural gas through expansion of clean, renewable energy sources such as solar, wind, and geothermal power sources, and changes to the vehicle fleet (i.e., increasing the use of hybrid, electric, zero and low emissions, and fuel-efficient vehicles). The Scoping Plan recommends strategies for implementation at the Statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The emissions reduction strategies included in the Scoping Plan that are applicable on a project-level include energy efficiency strategies, water use efficiency, recycling and solid waste reductions, and reductions in the emissions of gases with high global warming potential (e.g., emissions associated with use of commercial and industrial refrigerants).

Perhaps the most pertinent strategy of the Scoping Plan related to warehouses involved in goods movement, is the one aimed at implementing the California Sustainable Freight Action Plan, which includes two key elements:

- Improve freight system efficiency
- Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.

This action is to be implemented by a variety of state agencies, including CalSTA, CalEPA, CNRA, CARB, Caltrans and the CEC, rather than by individual land use projects. In the southern California region, a major initiative is underway by the Ports of Los Angeles and Long Beach to implement this plan, as follows. Since the proposed project is near both of these ports (within 8 miles) and is expected to handle goods that are shipped into and out of the Ports, this initiative would likely include a significant number of the trucks that are involved in Project operations, thus reducing GHGs from that transportation source, over time, as explained below.

The two Ports have jointly adopted the San Pedro Bay Ports Clean Air Action Plan, which includes the Clean Truck Program and applies to all trucks accessing the Ports. The Clean Truck Program regulations, which went into effect in 2018, require that new trucks entering the Ports' Truck Registry must have a 2014 engine model year or newer. Trucks with 2014 model year engines provide the current cleanest engine emissions level coupled with on-board diagnostics to assist in maintaining that level. The Clean Truck Program also requires that, beginning in early 2020, following promulgation of California's near-zero-emission heavy-duty engine standard, all heavy-duty trucks will be charged a fee to enter the Ports' terminals, with exemptions for trucks that are certified to meet this near-zero standard or better. Under the previous Clean Trucks Program,

which imposed a fee on older trucks, roughly 90% of the trucks were replaced within three years with cleaner models while 10% chose to pay the fee in the short term. Thus, the assessment of the truck fee could result in a significant turnover to near-zero-emissions trucks in the near-term. The Ports project that by 2024, as a result of the truck rate starting in 2020 and the 2023 requirement for any new trucks entering the service, near-zero-emission trucks could comprise roughly 70% to 90% of the Ports' truck fleet. To support the goal of ultimately transitioning to a zero-emission truck fleet in 2035, the truck fee implemented initially in 2020 will gradually be modified so that by 2035 it will only provide exemptions for trucks that are certified by the state to meet zero-emissions specifications.

As a result, trucks traveling between the project site and the Ports, which are anticipated to be many of the trucks using the project site, will be required to meet very strict emission standards. Since the analysis of the project's GHG inventory presented in the previous response to threshold a did not take credit for these reduced emissions with respect to the health risk or air quality or levels of GHGs, it is likely that the Project's trucking emissions will be lower than the levels reported herein. Further, warehouses in close proximity to the Ports, such as the project site, are also environmentally beneficial by reducing the number of miles trucks have to travel from the Ports to unload cargo for local destinations.

The Scoping Plan is not directly applicable to individual land use development projects nor is it intended to be used for project-level evaluations and, therefore, it is not appropriate to analyze the Project for direct consistency with the broad goals stated within the Scoping Plan. That said, the Project would contribute to GHG emissions reduction strategies identified within the Scoping Plan, such as those related to energy efficiency, water use efficiency, and recycling/solid waste reductions. The Project's contributions to these GHG emissions reduction strategies would result from mandatory compliance with CALGreen and Title 24 building standards, per Article 9 of Chapter IX of the Los Angeles Municipal Code). As required, the Project would utilize high efficiency lighting and water efficient fixtures in the proposed warehouse building and water efficient devices and landscaping in accordance with the California Department of Water Resources Model Water Efficient Landscape Ordinance. During construction and operation of the project, the project would comply with all applicable state regulations regulating solid waste disposal, such as the California Integrated Solid Waste Management Act, as implemented by Los Angeles Municipal Code Section 190.01. Further, as specified in PDF-3, the project would not involve cold storage and would, therefore, not emit substantial volumes of high-global warming potential gases associated with commercial or industrial refrigerants. Pursuant to PDF-2, all off-road machinery associated with warehouse operations and maintenance, i.e. forklifts and sweepers, would be limited to low or zero emissions propulsion systems, and diesel engines for that machinery would be prohibited. This would also substantially reduce potential GHGs from those sources. Therefore, the project would not conflict with the strategies and goals in CARB's Scoping Plan and would, therefore, not conflict with the State's trajectory toward future GHG reductions.

Regional

Senate Bill 375 (SB 375) was adopted in September 2008 in order to support the State's climate action goals to reduce GHG emissions from transportation sources through coordinated regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires CARB to set regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each Metropolitan Planning Organizations (MPO) within the State. It was up to each MPO to adopt a sustainable communities strategy (SCS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP) to meet CARB's 2020 and 2035 GHG emission reduction targets.

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (called Connect SoCal), adopted by the Southern California Association of Governments (SCAG) on September 3, 2020, provides GHG emission reduction targets for 2020 and 2035, which are an 8 percent (2020) and 19 percent (2035) GHG emission reduction target relative to 2005 for passenger vehicles and light duty trucks (SCAG 2020). SCAG states that the 8 percent reduction target for 2020 has been reached. Through various strategies, related to public transit infrastructure expansion and encouraging strategic placement of housing and employment centers, the Connect SoCal Plan aims to increase percentage of work trips made by carpooling (and reduce the number of commuters traveling by single-occupancy vehicles), reducing vehicle miles traveled (VMT) per capita, increasing use of transit for work trips, reduce travel delay for passenger vehicles and trucks, create new jobs in the region, and conserve open space by focusing residential and commercial development in higher density areas to promote use of transit. The Connect SoCal Plan details target VMT reductions in Los Angeles County from 22.2 daily VMT per capita (baseline year 2016) to 19.2 VMT per capita by 2045. In short, the Plan aims to reduce GHG emissions from passenger vehicles and light trucks by reducing VMT across the region. Further, the Connect SoCal Plan includes a number of strategies to reduce environmental impacts associated with regional goods movement while promoting job creation and maintaining regional economic competitiveness. Specifically, these strategies include identifying and funding infrastructure investments to improve freight mobility; workforce development strategies; and relevant to this analysis, a goods movement environmental strategy aimed at addressing air quality impacts associated with goods movement. Specifically, the Connect SoCal Plan focuses on updating existing truck fleets to be more efficient, with an overall goal of a fully zero emissions goods movement system. The Connect SoCal Plan Goods Movement action plan consists of a four-phase plan for scoping, developing, demonstrating, and deploying zero emission or near-zero emission trucks by 2045, which include battery electric, fuel cell, or natural gas/diesel internal combustion and electric hybrid engine freight trucks (SCAG 2020). The project would include installation of electric vehicle infrastructure in various parts of the site, including the truck docks area, to support future use of electrically powered trucks. Further, as noted earlier, the project site is located within 8 miles of the Ports of Los Angeles and Long Beach. As such, the project would benefit from the Clean Truck Program sponsored by both Ports, which is intended to replace the truck fleet over time with increasingly clean-burning vehicles and eventually an entirely emissions free truck fleet. Many of the trucks associated with the proposed warehouse are expected to

originate or end at the Ports; therefore, GHG reductions attributable to that Clean Truck Program will also benefit the proposed project.

Similar to the CARB Scoping Plan, the Connect SoCal Plan is not directly applicable to specific projects or intended to be used for project-level evaluations. However, as further discussed in Section XVII, Transportation, of this Initial Study, the project would generate 2,012 daily work VMT and 174 employees, which would result in an average work VMT per employee of 11.5. This value is below the threshold of significance established by the City of Los Angeles for the Harbor Area Planning Commission, where the project site is located, (12.3 VMT per employee). It is also well below the regional VMT target of 19.42 by the year 2045. Therefore, because the project would not exceed significance criteria for the Harbor Area Planning Commission that were established by the City of Los Angeles to be consistent with Senate Bill 743 and to reduce VMT with the broader goal of reducing GHG emissions, the project would not conflict with the VMT reduction goals set forth in SCAG's RTP/SCS. Further, the project would not conflict with SCAG's strategies under the Connect SoCal Plan to develop and deploy zero-emission trucks in the region.

City

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce GHG emissions through their police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of GHG emissions resulting from its land use decisions. To achieve this, the City has a series of plans to reduce GHG emissions, which are discussed below.

Green LA

The City of Los Angeles began addressing the issue of global climate change through the Green LA Plan (Green LA: An Action Plan to Lead the Nation in Fighting Global Warming), in 2007 (Los Angeles 2007). The document outlines the goals and actions the City established to reduce generation and emissions of GHGs from both public and private activities. Specifically, the City committed to a goal of reducing emissions of CO_2 to 35 percent below 1990 levels by the year 2030 through increasing generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. In 2008, the City released an implementation program for the Green LA Plan referred to as ClimateLA, which provides detailed information about each action item discussed in the Green LA Plan. Action items in ClimateLA range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

As stated above, the overarching goal of the Green LA Plan is to reduce GHG generation and emissions from both public and private activities. Broader GHG emissions reduction strategies undertaken by the City of Los Angeles to reach goals in the Green LA plan, such as related to solid waste disposal and renewable energy supply (through LADWP) would not be directly impacted by the project. The Project would comply with mandatory City of Los Angeles' zoning regulations and building efficiency standards, including CALGreen and Title 24 building

standards, per Article 9 of Chapter IX of the Los Angeles Municipal Code. Further, the project would generate an average work VMT per employee of 11.5, which is below the threshold of significance established by the City of Los Angeles for the Harbor Area Planning Commission, where the Project Site is located. Therefore, the project would not conflict with the GHG emissions reduction targets identified in the Green LA plan and impacts would be less than significant.

The RENEW LA Plan

To reach the solid waste reduction goals within the Green LA Plan, the City implemented the Recovering Energy, Natural Resources, and Economic Benefit from Waste for Los Angeles (RENEW LA) plan in 2006. The RENEW LA plan aims to reduce solid waste by expanding recycling to multifamily dwellings, commercial establishments, and restaurants while also developing facilities converting solid waste to energy without incineration. Specifically, the RENEW LA plan had a goal to reduce, reuse, recycle, or convert resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025. Given that landfills are one of the largest sources of methane, the City can reduce its GHG emissions through waste reduction and recycling programs, such as the RENEW LA plan.

As stated above, the RENEW LA plan provides city-wide goals for reducing the amount of waste that is generated within the City and transported to landfills. As such, there are no project-level goals that are listed in the plan that would be applicable to the proposed project. However, the Project would comply with the City's mandatory construction and demolition recycling ordinance, which requires all mixed construction and demolition waste generated within the City to be taken to a City-certified construction and demolition waste processor, as designated by the City's Sanitation department (LASAN) (Los Angeles 2020). Further, the project would comply with solid waste reduction regulations during Project operation, such as Section 5.410.1 of the City's municipal code requiring accessible areas for storing and collecting non-hazardous recyclable materials on-site, as well as the City's Solid Waste Integrated Resources Plan, which requires franchised waste haulers in the City to deposit commercial waste at City-certified processing facilities that can divert at least 70 percent of the waste away from landfills through reusing or recycling the waste Therefore, the project would not conflict with the RENEW LA plan and impacts would be less than significant.

City of Los Angeles Green New Deal / Sustainable City pLAn

The City of Los Angeles's Sustainable City pLAn (pLAn), prepared in 2015 and updated in 2019, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets identified in the 2015 pLAn include reducing vehicle miles traveled per capita by 5 percent by 2035 and increasing trips made by walking, biking or transit by at least 35 percent by 2025.

In 2019, the first update to the pLAn was released, referred to as LA's Green New Deal: Sustainable City pLAn (Los Angeles 2019). Although this was introduced as a mayoral initiative, and is not a formally adopted plan or policy, the updated document expands upon the City's vision

for a sustainable future and provides accelerated targets and new goals. The 2019 update establishes targets such as supplying 100-percent renewable energy (through LA Department of Water and Power) by 2045, reducing building energy use for all types of buildings 34 percent by 2035 and 44 percent by 2050, reducing VMT per capita by 45 percent by 2050 diversion of 100 percent of waste by 2050, and reducing municipal GHG emissions to reach carbon neutral conditions by 2045. All of these measures would reduce the level of GHGs generated throughout the City.

As stated above, the project would comply with mandatory City of Los Angeles' zoning regulations and building efficiency standards, including CALGreen and Title 24 building standards, per Article 9 of Chapter IX of the Los Angeles Municipal Code. The Project would also generate an average work VMT per employee of 11.5, which is below the threshold of significance established by the City of Los Angeles for the Harbor Area Planning Commission, where the project site is located. Adhering to mandatory building energy efficiency standards and meeting VMT significance thresholds established by the City would, therefore, contribute to achieving the aspirations included in the Sustainable City pLAn. As such, the project would not conflict with the GHG emissions reduction and VMT reduction targets identified in the Green New Deal: Sustainable City pLAn and impacts would be less than significant.

In conclusion, the analysis above demonstrates that the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, including the CARB Scoping Plan, the 2020-2045 RTP/SCS, the Green LA Plan, the RENEW LA plan, and LA's Green New Deal: Sustainable City pLAn. Therefore, Project impacts in this regard would be less than significant.

2. Quantification of Emissions

In addition to the evaluation of the project's consistency with plans adopted for the purpose of reducing and/or mitigating GHG emissions, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. As noted earlier, the primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which requires a good-faith effort by the lead agency to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. The significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

The project would generate GHG emissions during the construction activities, through emissions from combustion-powered machinery and vehicles, plus applications of asphalt and architectural coatings, as well as during Project operation, when the Project would result in ongoing generation of GHG emissions, from direct and indirect sources. Direct sources of GHG emissions include area sources, (e.g., consumer products, aerosol sprays, and landscaping maintenance); building energy consumption; off-road equipment (i.e., non-diesel-powered forklifts utilized onsite,

pursuant to Project Design Feature 2, described in Section III, Air Quality, of this Initial Study); and mobile sources (e.g., vehicle emissions). Indirect sources of GHG emissions include emissions generated by water consumption, wastewater treatment processes, and solid waste disposal.

Annual GHG emissions that would be generated by the project, including amortized construction period emissions and long-term operational emissions, have been calculated with CalEEMod, the California Emissions Estimating Model, developed to support evaluations of land use related air pollutant and GHG emissions, as well as energy consumption, throughout California. CalEEMod was developed for the California Pollution Control Officers Association (CAPCOA) and is the preferred method of calculating emissions of criteria air pollutants and greenhouse gases and for calculating energy consumption, generally throughout California, and in the South Coast Air Basin in particular. The modeling accounts for emissions from a specific range of construction machinery and vehicles and from the stationary and mobile sources associated with the fully operational project. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California Air Districts to account for local requirements and conditions. Further, the model can be configured to apply mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.

As seen in Table VIII-1 below, the Project would generate an estimated 1,433.30 MTCO2e/year. This estimate conservatively does not take credit for the existing uses on site.

Since the California legislature adopted AB 32, the Global Warming Solutions Act in 2006, there have been a number of subsequent legislative mandates to initiate and implement a variety of GHG reduction strategies throughout the economy and focused on various major GHG sources. This has resulted steady declines in statewide GHG emissions. Without such mandates, the statewide GHG inventory would be much different than today, with higher volumes generated each year. The Project's GHG inventory, shown in **Table VIII-1**, reflects all of the GHG-reducing effects of legislation adopted to implement AB 32, where such effects can be captured in the calculation of the project's energy, transportation, and additional indirect GHG emissions. The total reductions from without AB 32 legislative mandates are also highlighted in **Table VIII-2**. Overall, the proposed project GHG inventory would have emission levels approximately 35% lower than "baseline" levels without various GHG-reducing legislative mandates enacted following adoption of AB 32. CalEEMod inputs for the GHG inventory are identical to those applied for the calculations of criteria pollutant emissions presented in Section III – Air Quality of the MND, and are specified in Appendix A.

To provide a picture of how important and beneficial the post AB 32 legislative mandates have been to reduce a land use project's GHG inventory, **Table VIII-2** indicates the project's emissions without AB 32 legislative mandates.

Noteworthy differences between the Project's emissions without and proposed emissions with AB 32-related benefits result from:

- Significant improvements in building energy efficiencies, mostly due to increasingly stringent performance standards set forth in Title 24, Parts 6 and 11 of the California Code of Regulations

- Cleaner burning petroleum-based transportation fuels and cleaner vehicle exhaust standards

- Stronger standards for solid waste disposal to reduce wastes sent to landfills, where decaying trash generates methane gas, a potential greenhouse gas

- Higher water conservation standards that reduce the amount of energy and related GHG emissions required to extract, treat and transmit water supplies

- Renewable energy portfolio standards that require increasingly higher percentages of clean and renewable energy sources in the energy supply portfolio of major energy producing entities, including the Los Angeles Department of Water and Power

TABLE VIII-1
PROJECT ANNUAL GREENHOUSE GAS EMISSIONS

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	
Direct Emissions						
• Construction (total of 698.77 $MTCO_2e$ amortized over 30 years)[3]	23.19	<0.01	0.10	0.00	0.00	23.29
• Area Source	<0.01	<0.01	<0.01	0.00	0.00	<0.01
• Mobile Source[4,5]	837.99	0.04	1.05	0.00	0.00	837.99
• Off-Road Source[6]	69.83	0.02	0.56	0.00	0.00	70.40
Total Direct Emissions[6]	***931.01***	***0.06***	***1.71***	***0.00***	***0.00***	***931.68***
Reduction From Pre-AB 32[7]	***-385.74***	***-0.02***	***-0.39***	***0.00***	***0.00***	***-387.18***
Indirect Emissions[8]						
• Energy	270.49	<0.01	0.16	<0.01	0.53	271.18
• Solid Waste Generation	16.63	0.98	24.56	0.00	0.00	41.19
• Water Demand	155.29	1.05	26.33	0.03	7.63	189.25
Total Indirect Emissions[6]	***442.41***	***2.03***	***51.05***	***0.03***	***8.16***	***501.62***
Reduction From Pre-AB 32[7]	***-355.12***	***-1.27***	***-31.33***	***0.00***	***-2.34***	***-388.78***
Total Project-Related Emissions and Reduction From Pre-AB 32[7]	***1,433.30 $MTCO_2e$/year*** *(**-775.96** $MTCO_2e$/year or 35% reduction)*					

Notes:

1. Emissions calculated using California Emissions Estimator Model Version 2016.3.2 (CalEEMod) and the California Air Resources Board (CARB) EMission FACtor (EMFAC-2017) computer model to account for post Assembly Bill 32 requirements.

2. CO_2 Equivalent values calculated using the EPA Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed November 2020.

3. Per MM III-2, all construction equipment greater than 50 brake horsepower (bhp) will be U.S. Environmental Protection Agency (EPA) Tier 4 Final Certified, which would reduce particulate emissions.

4. According to the Los Angeles Department of Transportation, *Bridge Point South Bay VII Transportation Assessment Memorandum of Understanding*, dated October 29, 2020, the project would create 1,088 daily trips with 7,401 daily vehicle miles traveled (VMT). Vehicle emission factors calculated with EMFAC2017.

5. The project would include improving the pedestrian network on-site and connecting off-site and is adjacent to an existing transit stop, which could reduce mobile emissions from passenger vehicles associated with on-site workers.

6. Totals may be slightly off due to rounding.

7. The reductions were calculated by subtracting the Project AB32 GHG emissions from the Project GHG emissions without the GHG reducing effects of post-AB 32 legislation, as shown in Table VIII-2.

8. Assembly Bill 32 emission reductions applied in the CalEEMod model include regulatory requirements such as compliance with the 2019 Title 24 Building Standards Code, the 2019 CALGreen Code, Assembly Bill 341 (statewide mandatory commercial recycling program), and the Renewable Portfolio Standard (RPS). These mandatory regulatory requirements would include high efficiency lighting, low flow plumbing fixtures, solid waste diversion, and electricity from LADWP generated by its expanding portfolio of renewable energy sources, consistent with the State's AB32 goals of reducing GHG emissions.

Refer to Appendix B for detailed model input/output data.

TABLE VIII-2
PROJECT GREENHOUSE GAS EMISSIONS, WITHOUT POST AB 32 LEGISLATIVE MANDATES

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO2e
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	
Direct Emissions						
• Construction (total of 699.15 $MTCO_2e$ amortized over 30 years)	23.20	<0.01	0.11	0.00	0.00	23.31
• Area Source	<0.01	<0.01	<0.01	0.00	0.00	<0.01
• Mobile Source[3]	1,226.50	0.06	1.46	0.00	0.00	1,227.96
• Off-Road Source[6]	69.83	0.02	0.56	0.00	0.00	70.40
Total Direct Emissions[4]	***1,319.53***	***0.08***	***2.13***	***0.00***	***0.00***	***1,321.67***
Indirect Emissions						
• Energy	454.99	0.01	0.27	<0.01	0.81	456.06
• Solid Waste Generation	33.25	1.97	49.13	0.00	0.00	82.38
• Water Demand	309.29	1.32	32.98	0.03	9.69	351.96
Total Indirect Emissions[4]	***797.53***	***3.30***	***82.38***	***0.03***	***10.50***	***890.40***
Total Project-Related Emissions[4]	***2,212.07 MTCO2e/year***					

Notes:

1. Emissions calculated using California Emissions Estimator Model Version 2016.3.2 (CalEEMod). Vehicle emission factors calculated with EMFAC2014.

2. CO_2 Equivalent values calculated using the EPA Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed November 2020.

3. According to the *Bridge Point South Bay VII Transportation Assessment Memorandum of Understanding*, dated November 2020, the project would create 1,088 daily trips with 7,401 daily vehicle miles traveled (VMT). This total would be the same for pre- or post-AB 32 conditions since the site location and urbanized character of the surrounding area and the geometry of the truck network have changed little in last 20 years.

4. Totals may be slightly off due to rounding.

Refer to Appendix B, for detailed model input/output data.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based on the findings of the following:

- *Phase I Environmental Site Assessment prepared by Ardent Environmental Group, Inc. (dated August 11, 2020), provided in Appendix G-1 to this IS/MND,*
- *Phase II Environmental Site Assessment prepared by Ardent Environmental Group, Inc. (dated August 11, 2020), provided in Appendix G-2 to this IS/MND,*
- *Soil Management Plan prepared by Ardent Environmental Group, Inc. (dated September 11, 2020), provided in Appendix G-3 to this IS/MND,*
- *Construction Site Well Review Letter prepared by the California Department of Conservation Geologic Energy Management Division ("CalGEM") dated January 7, 2021, provided in Appendix G-3 to this IS/MND, and*
- *Memorandum on Proposed and Anticipated Oil Well and Methane Mitigation Measures, prepared by WZI Inc. (dated February 3, 2021), provided in Appendix G-5 to this IS/MND.*

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. A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed project would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids.

The project is a warehouse/distribution center that will allow for storage and transportation of finished or partially finished goods and materials, excluding any significant quantities of hazardous substances, to customers located throughout southern California. There would also be some ancillary office space for administrative, sales or other office-oriented activities associated with the primary businesses. The project does not include fuel storage or dispensing facilities and also does not involve any heavy manufacturing uses. Thus, once the proposed warehouse is fully operational, it is anticipated that there would be some limited transport, handling, and disposal of hazardous substances that are typically associated with warehouse types of uses. This may include but is not limited to the use of small quantities of common chemical substances found in offices and warehouse spaces, such as toners, batteries, paints, lubricants, restroom cleaners, and other maintenance products. Transport, storage, use, and disposal of these materials is commonplace in businesses of all types, is not specifically regulated by the City of Los Angeles Fire Department (LAFD) and does not represent a significant threat to the environment or public health. Project impacts would, therefore, be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant With Mitigation Incorporated. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. The removal of asbestos is regulated by SCAQMD Rule 1403; therefore, any asbestos found on-site would be required to be removed in accordance with applicable regulations.

As discussed in the preceding response, the proposed warehouse operations would not involve activities that could result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment. The discussion of this threshold, therefore, focuses on potential impacts that could occur during site demolition, oil well reabandonment, and construction activities. Impacts could occur if there were an accidental release of hazardous materials from disturbance of existing site improvements and subsurface materials that are known to be contaminated or which could result in unexpected disturbances of unknown contamination that may exist. This discussion also addresses potential releases of hazardous substances during the course of standard construction activities that could occur at virtually any construction site.

Groundwater is estimated beneath the site at approximately 65 to 69 bgs and since the proposed grading would not extend to depths greater than 6 feet, groundwater would not be encountered during redevelopment activities.

Existing Conditions - Findings of Environmental Site Assessments

Phase I and Phase II Environmental Site Assessments (ESAs) have been conducted at the project site by Roux (2019) and Ardent (August 2020) (both are available as Appendix G-1 and G-2, respectively). These were completed in accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E 1527-13, ASTM Standard E 2600-15, and the EPA Standards and Practices for All Appropriate Inquiries (AAI), Final Rule (40 CFR, Part 312). The purpose of the Phase I assessment was to review historic land uses on and near the site to identify potential environmental concerns involving known or potential releases of environmental contaminants, and to evaluate existing conditions to identify other potential sources of environmental contaminants that could represent a threat to construction workers, neighboring land uses and/or the environment. Based on the results of the Phase I ESA, a Phase II ESA was completed by Ardent to evaluate concentrations and pressures of volatile soil gasses and determine the scope of remedial measures to be conducted during construction and in the project design. Key findings of these assessments are summarized below.

The site is located within the Torrance Oil Field and Major Oil Drilling Area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit E and Environmental and Public Facilities Map (1996). Six oil wells were installed throughout the site between 1924 and 1925 (Figure 2). Five of the wells were plugged and abandoned by 1930. One oil well, identified as Sloan 1, remained in intermittent operation until it was plugged and abandoned in 1965. Historical aerial photographs indicate that the site was primarily used for residential purposes or was vacant land from approximately 1947 to at least 1952.

Associated Ready Mix and Concrete occupied the middle parcel (AIN 7347-018-003/1361 Sepulveda) as a concrete batch plant from at least 1963 through 2012. The inactive batch plant structure still remains in place. A 12,000-gallon diesel underground storage tank (UST), used to fuel fleet vehicles, was installed at an unknown date and was removed by Associated Ready Mix and Concrete as part of their site closure activities. Removal of the 12,000-gallon diesel UST was completed under the oversight of the City of Los Angeles Fire Department (LAFD) and documented by Roux Associates, Inc. (Appendix G-1). Three confirmation soil samples were

collected from the excavation as part of the removal. According to Roux, one sample contained elevated concentrations of petroleum hydrocarbons in the diesel range above the LAFD action threshold. Following the completion of supplemental investigation by Roux, the elevated levels of petroleum hydrocarbons were determined to be limited in extent and potentially due to historical oil production activities. Based on this information, on June 12, 2013, the Los Angeles County Fire Department issued a No Further Action (NFA) for the former feature (see Appendix G-1).

From approximately 1952 to at least 1963, the largest parcel (AIN 7347-018-078/1355 Sepulveda) was used for residential purposes or was vacant land (in addition to oil well operation). By 1970, an office building was constructed in the northeastern portion and the surface was paved for use as a parking lot. From at least 1970 to approximately 1977, Western Brass Works used the northern portion of the parcel for storage. In 1993, Mulligan Family Fun Center (Mulligan) redeveloped Parcel 1 for use as a family amusement park, including a mini golf course, go-kart track, batting cages, parking lot, and expansion of the existing office building into an arcade, kitchen, and laser tag building. Mulligan incorporated the easternmost parcel (AIN 7347-018-085/No address) into the property in 2001, including redevelopment of the parcel for use as a parking lot, maintenance building, and go-kart racetrack. An office building was constructed in the northwestern portion of the site for use by the northern adjacent golf driving range in 2001 and was demolished by 2009. In 2020, the maintenance building on the eastern parcel was demolished. No environmental concerns were identified with respect to the former buildings or parking lots and no mitigation measures are warranted.

Western Brass Works, an industrial facility, was historically located along the eastern border of the site. From approximately 1952 to 1994, Western Brass Works expanded its operations onto Parcel 3 and used the site for staging, storage, and other unknown operations. An outbuilding of unknown usage was noted in the northeastern portion of the eastern parcel from at least 1970 through 1994. There is no evidence that Western Brass Works used volatile organic compounds (VOCs) on-site.

A multi-tenant office/warehouse site, located approximately 0.1 mile northwest of the project site, is listed in the State Water Resources Control Board GeoTracker database as an active remediation case, due to presence of VOCs in soil, soil vapor and groundwater beneath that facility. The Responsible Party for this off-site property is currently delineating offsite groundwater impact and conducting an interim remedial measure to remediate the source area under the regulatory oversight of the Los Angeles Regional Water Quality Control Board. A soil vapor extraction system was installed at this property in 2018.

Based on the above findings, the Phase I ESA noted the following Recognized Environmental Conditions (RECs) and historical REC (HREC):

- Petroleum hydrocarbon impacted shallow soil from historical oil field production activities on site (REC);
- Potential for migration of volatile organic compounds (VOCs) into soil, soil gas, and groundwater from the historic release at the multi-tenant office/warehouse located off-site, northwest of the site (REC);

- Potential VOC contamination from possible historical degreasing operations at the Western Brass Works outbuilding in the northeastern portion of the site (REC);
- Former underground fuel storage tank within the former batch plant property (HREC); and
- Site location within a known methane zone regulated by the City of Los Angeles (REC).

Based on the information obtained during the Phase I ESA, Ardent recommended the following actions to be addressed in a Phase II ESA:

a) A subsurface investigation should be completed to assess possible contamination in areas not previously investigated.
    - Soil borings should be advanced to screen for possible shallow contamination from oil field activities.
    - Soil gas samples should be collected to screen for the possible presence of VOCs originating from the off-site plume and former on-site industrial activities.
b) Prior to redevelopment of the site, a work plan must be submitted to the LADBS for review and approval in accordance with Ordinance No. 175790 and Site Testing Standards for Methane (Public Building Code Document No. P/BC 2014-101). The LADBS will require future buildings to be constructed with a methane mitigation system with a design based on the investigation results.
c) A licensed petroleum engineer should review the well logs for each of the on-site oil wells and the locations of the wells with respect to proposed redevelopment to assess whether the wells will need to be re-abandoned.

Pursuant to recommendation a) above, a Phase II ESA was conducted to further investigate subsurface conditions, which included soil and soil gas sampling. A preliminary methane gas survey was also completed based on the site's location with the City of Los Angeles Methane Zone. Soil borings were drilled at the site to a depth of approximately 15 feet below the ground surface (bgs) and samples were analyzed for petroleum hydrocarbons, VOCs, and metals. Based on the results, VOCs were not detected in soils, and metals were within background concentrations or below levels of concern. Petroleum hydrocarbons, however, were detected sporadically in the shallow soil throughout the site, primarily in the upper 2 to 5 feet. The petroleum hydrocarbons were detected in the diesel and oil ranges, at concentrations below regulatory screening levels for the protection of human health and groundwater. Based on a review of the chromatograms, the petroleum hydrocarbons appeared to be weathered crude oil. Based on the random distribution, the likely source of the weathered crude oil was determined to be surface spillage during the historical oil exploration and production activities at the site. The levels of petroleum hydrocarbons detected are considered low and are generally below the state and federal screening guidelines for protection of human health and the environment.

Soil gas samples collected throughout the site indicated concentrations of VOCs associated with crude oil (i.e. benzene, ethylbenzene, toluene, trimethylbenzene, xylenes, etc.) and chlorinated VOCs (i.e. tetrachloroethylene [PCE], trichloroethene [TCE], cis-1,2- dichloroethene [cis-1,2-DCE]). The VOCs associated with crude oil were generally below regulatory screening levels. The soil gas concentrations of one chlorinated VOC, PCE, exceeded screening levels in some soil gas samples and increased towards the northeast portion of the site, in the vicinity of previous onsite and offsite industrial land use by Western Brass Works. Based on the results of

supplemental soil gas samples collected from the northeast corner of the site during the investigation, the PCE appears to be originating from an offsite source to the northeast or east.

Methane was detected at concentrations ranging from 1,000 to 2,000 parts per million by volume (ppmv) in probes at boring AB-4 to AB-6. Probe pressure or vacuum was not detected in any of the probes. Based on the methane concentrations and probe pressure and comparison to Table 7.1 in Los Angeles Department of Building and Safety (LADBS) Ordinance No. 175790, the minimum methane mitigation requirements for a proposed building at the site were determined to be Level III (methane concentration of 1,001 to 5,000 ppmv) with design methane pressure less than two inches of water (i.e., a passive methane venting system).

Based on these findings, the Phase II ESA includes the following recommendations:

- Perform a site-specific methane investigation in accordance with LADBS Ordinance No. 175790 and design and install a methane mitigation system (MMS) for future site buildings in accordance with the results of the investigation and City requirements. The methane investigation should be performed after demolition of site buildings and features to allow full access to the site and submitted to the LADBS during plan check approval of building permits.
- Design and install a vapor intrusion mitigation system (VIMS) for the proposed warehouse structure to mitigate the potential human health risk from possible vapor intrusion of VOCs into indoor air. The VIMS can be designed in conjunction with the MMS that is going to be installed in the new improvements. The VIMS will address any potential risk to future site occupants from vapors in the subsurface emanating from the offsite source(s).
- Due to the potential for buried debris and remnant oil field contaminants that may occur within the site, prepare and implement a soil management plan for implementation during future development or excavation/grading activities (discussed further below).

Compliance with the City's existing regulatory standards for development within a methane zone (Ordinance No. 175790 and Site Testing Standards for Methane, Public Building Code Document No. P/BC 2014-101) as implemented by the recommendations in the Phase II ESA for mitigation measures would adequately address the soil gas conditions and reduce impacts to less than significance. This will be accomplished through the project specific mitigation measures set forth below. The Passive System referenced in MM IX-2 is a dual purpose MMS and VIMS (meeting the Phase II recommendations above) that will be installed regardless of the concentration or methane pressures detected in the required methane investigation, as stated in the mitigation measure.

Mitigation Measures: The following mitigation measures would be required during project construction.

MM IX-1: The Applicant shall conduct a subsurface methane investigation in accordance with Los Angeles Department of Building and Safety Document No. P/BC 2014- 101 Site Testing Standards for Methane. The subsurface methane investigation shall include but is not limited to:

A. Installation of 30-35 gas probes set throughout the Site;

B. Gas Probe Sets include probes at approximate depths of 5, 10, and 20 feet below ground surface or the lowest building slab elevation;
C. Collection of methane soil gas and pressure measurements in the field.

The purpose of the subsurface methane investigation is to determine the level of methane concentrations that exist at the site, and the level of methane pressure (in inches water pressure) that exist at the site. Possible measures that may be added subject to the approval of the Los Angeles Department of Building and Safety ("LADBS"), include but are not limited to:

D. Passive sub-slab vent system and impervious membrane;
E. Gas detection, alarm, and mechanical ventilation system on the lowest occupied spaces;
F. A control panel for active/mechanical components;
G. Additional vent risers.

MM IX-2: The Applicant shall install a Passive System regardless of the design methane concentration or the design methane pressures. The Passive System for this project shall include at minimum:

A. A standard de-watering system in the event that groundwater is encountered. ;
B. Sub-slap vapor collection and ventilation system that includes:
   - Perforated horizontal collection piping;
   - Permeable gravel blanket for soil gas migration of a minimum 2" thick;
   - Solid vent risers (amount and size are dependent on building size);
   - A complete impervious membrane (barrier) system. Since there are known oil wells on site, this barrier system will be a chemically compatible spray-applied product that covers the entire footprint of the proposed structure;
   - Trench dams and conduit seal fittings.

Soil Management Plan

Due to the potential for buried debris and remnant oil field contaminants that may occur within the site, a Soil Management Plan (SMP) has been prepared and is included as Appendix G-3. The SMP specifies the manner and implementation of monitoring grading activities to identify and properly manage known and unknown environmental concerns that might be encountered during site grading and development. The SMP provides procedures for the effective and prompt communication of the discovery of unknown environmental concerns during site grading and development. The SMP also includes preparation of a Health and Safety Plan to control the exposure of site workers and the general public to dust, vapors, or odors associated with the site grading operations. Implementation of the SMP will be required through Mitigation Measure IX-3, below.

Mitigation Measures: The following mitigation measures would be required during project construction.

MM IX-3: Implement the Soil Management Plan included as Appendix G-3 of the MND during grading activities.

Based on the results of the Phase I and Phase II ESAs, the level of risk for potential release of harmful levels of contaminants during soil disturbing activities is considered to be low and less than significant. With implementation of the Phase II ESA recommendations and SMP, as

required by mitigation measure MM IX-3 noted above, the potential for an accidental release would be less than significant. .

Potential Impacts Associated with Oil Well Reabandonment

The site is located within the Torrance Oil Field. Six oil wells were installed throughout the site between 1924 and 1925. Five of the wells were plugged and abandoned by 1930 and the last well was plugged and abandoned in 1965. No oil well is in current use. According to the Construction Site Well Review Letter prepared by the California Department of Conservation Geologic Energy Management Division ("CalGEM", dated January 7, 2021 (Appendix G-4), the six wells are not abandoned to current Division requirements, and three of those wells are projected to be built over or have future access impeded by the subject project. All six wells have been located and surveyed. None of the wells are currently leaking.

A Memorandum on Proposed and Anticipated Oil Well and Methane Mitigation Measures was prepared by WZI Inc. dated February 3, 2021 (Appendix G-5). According to the memorandum, the three wells that will be located beneath the proposed building will be re-abandoned in accordance with current regulations as required by the CalGEM. WZI Inc. will also design, permit (plan check), inspect and certify methane mitigation measures beneath the proposed building. The remaining three wells will have a precast vault placed over each well for access and be leak tested under the oversight of CalGEM. All six wells will receive ventilation and protection.

All re-abandonment work will be subject to a Site Remediation Program permitted by CalGEM to ensure safe and environmentally sound operations, which will avoid significant impacts. All oil reabandonment work will be performed by licensed and experienced petroleum engineers. Oil well reabandonment procedures include drilling out existing concrete and debris from the wellbore and placing new cement in the wellbore. The purpose of the cement is to seal the wellbore and prevent fluid and gas from migrating between underground rock layers and the surface. Reabandonment will use a conventional oil well rig equipped with tools to allow drilling out cement inside the well casing. Waste materials created by these activities would be disposed of in accordance with current regulatory standards for the types of materials involved. The three remaining oil wells that are not under the proposed building will be leak tested to ensure that they do not pose a threat to the environment or public. Demolition and some grading may need to be performed before well abandonment to allow access to the well(s) and room for well drilling and associate equipment. The oil well reabandonment and leak testing will be guided by the following project-specific mitigation measure:

Mitigation Measure: The following mitigation measure would be required during project construction.

MM IX-4: The Applicant shall locate, survey, and leak test the three oil wells outside the proposed building footprint and all six wells will receive ventilation and protection, including but not limited to:

a) Locate: Each well must be located to verify that it is or is not within the Site boundaries;
b) Survey: Each well must be surveyed to provide the exact location of this well on the Site;

c) Leak Tested: Following exposure, the top casing of each well must be leak tested in the field for excessive methane levels, with CalGEM personnel present to verify. If a well is determined to be leaking, reabandonment activities are likely necessary;
d) Ventilation and protection: All six oil wells will require that a protection and ventilation cone be placed over the well cap (head). Attached to the vent cone will be a solid pipe vent riser that will terminate above breathing levels. This ventilation is a precautionary measure should the well ever begin to leak.

Implementation of CalGEM regulatory requirements for the re-abandonment of the three oil wells, as well as the mitigation measure above for surveying and leak testing all wells, would ensure that there would not be a release of hazardous substance associated with the former/abandoned oil wells within the project site and would avoid a significant impact involving such circumstances.

Potential Impacts Associated with Typical Construction Activities

Site development would involve a range of typical construction activities that would include the use of common hazardous materials, substances, or chemicals such as fuels, oils, lubricants, paints, concrete, solvents, and glues. Without appropriate good housekeeping measures, there is a potential for an accidental release of hazardous substances and/or water pollutants during various construction activities. This could occur from any of the following:

- Fueling and re-fueling of construction machinery;
- Pouring, curing and finishing of concrete;
- Paving and grinding of existing pavement surfaces; and
- Vehicle cleaning and maintenance.

As part of the Stormwater Pollution Prevention Plan (SWPPP) that must be prepared to obtain a General Construction Permit from the Los Angeles Regional Water Quality Control Board (LARWQCB), measures to prevent discharges of hazardous materials, and to be prepared to respond quickly and effectively to accidental spills and releases, will be identified and implemented by the responsible contractor(s). For example, discharges of construction materials and wastes such as paints and fuels resulting from dumping or spills that come into contact with rainwater or stormwater runoff is prohibited. A variety of BMPs will be included in this project's SWPPP to prevent releases of hazardous substances from the sources noted above. Examples of these BMPs include:

a) Fueling of construction machinery must occur on level ground, with drip pans and/or absorbent pads, at least 50 feet away from any drainage inlets.
b) Pouring, curing and finishing of concrete will be avoided just prior to or during any rainstorms. Ensure that concrete curing materials are properly stored and maintained, that rainwater cannot come into contact with such areas, and that there are collection and wash-out areas provided to prevent runoff-off of concrete curing or waste materials.
c) Cover any drainage inlets or culverts near paving areas and immediately sweep and clean such areas after paving is completed.
d) Restrict vehicle cleaning or vehicle maintenance to appropriate off-site locations or ensure that such activities occurring on-site shall be located in specially designated areas, on level ground at least 50 feet away from any drainage facilities, with appropriate drip pans and absorbent pads. Cleaning of vehicles and equipment with soap, solvents

or steam should not occur on the project site unless resulting wastes are fully contained and properly disposed of. Resulting wastes should not be discharged or buried and must be captured and recycled or disposed of properly. Facility wash racks, if any, should discharge to a sanitary sewer, recycle system or other approved discharge system and must not discharge to the storm drainage system, watercourses, or to groundwater.

The regulatory General Construction Permit procedure would ensure that adequate precautions are in place to avoid a significant impact related to hazardous materials as a result of construction activities, and impacts would be less than significant.

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. The closest public schools are more than ½ mile from the project site, as follows:

- President Avenue Elementary School, 1465 West 243rd Street, Harbor City. This school campus is located approximately 3,050 feet (0.58 mile) to the south of the project site.
- Meyler Elementary School, 1123 West 223rd Street, Torrance. This school campus is located approximately 3,290 feet (0.62 mile) to the northeast of the project site.

All surrounding properties within ¼ mile are already developed and there are no readily available sites to support a new school in this area.

The Proposed Project would not generate any emissions to the atmosphere from activities conducted inside the warehouse. The only emissions would be associated with vehicular traffic exhaust and occasional site maintenance machinery exhaust. Those emissions would dissipate prior to reaching those nearest school sites. As explained in the earlier response to threshold a, the Proposed Project is a warehouse/distribution center that will allow for storage and transportation of finished or partially finished goods and materials, excluding any significant quantities of hazardous substances. The small quantities of common hazardous substances found in cleaning agents, office printers, paints, batteries that would be stored and used onsite would not require any permits and do not represent significant hazards. This Project would not result in emissions or handle hazardous or acutely hazardous substances within ¼ mile of an existing or proposed school, and impacts would be less than significant.

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. A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight.

As part of the Phase I ESA prepared for the project site, a search was conducted of multiple federal, state, local and tribal lists of sites reported to as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects. This comprehensive search was conducted in accordance with the current standards of the ASTM and AAI and included a review of the databases referenced in California Government Code Section 65962.5, and additional databases. The project site was not identified on any of the federal lists. This project site is listed in the following State databases, due to a former 12,000 gallon diesel underground storage tank that was properly removed in 2012, in accordance with the governing regulations:

- *Leaking Underground Storage Tanks (LUST).* LUST information is maintained by the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCB).
- State Underground Storage Tank (UST) and Aboveground Storage Tank Registration List. These databases are maintained by the SWRCB.

Because the former UST was properly removed and based on the low concentrations of petroleum hydrocarbons and VOCs measured at the site, there are no remaining concerns regarding a potential accidental release of hazardous substances from that source.

The project site is also listed on the following state databases, due to the stormwater management requirements associated with the former concrete batch plant operations.

California Integrated Water Quality Systems (CIWQS): This database is maintained by the State of California and the regional water boards to track information about places of environmental interest, manage permits, track inspections, and manage violations and enforcement activities. Listing on these databases is not indicative of a release. The project site is listed as Associated Ready Mix Concrete for an industrial stormwater program, which was active from June 2, 1992 through May 5, 2012.

Waste Discharge System: The WDS database documents facilities that have been issued waste discharge requirements. Listing on these databases is not indicative of a release. The site is listed on this database as “Associated Ready Mix Concrete” as an active industrial facility. This listing is likely out of date, since Associated Ready Mix Concrete ceased on-site operations in 2012.

Since the former concrete batch plant operations and related stormwater mechanisms were terminated in 2012, this does not represent a potential for a release of hazardous substances from that source during project construction activities.

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 or excessive noise for people residing or working in the project area?

No Impact. The project site is located approximately 1.96 miles northeast of the nearest edge of the Torrance Airport. It is well outside of any Airport Influence Area, however, as depicted on the Airport Influence Area map prepared by the Los Angeles County Airport Land Use Commission, in May 2003. As such, the project would not be affected by any airport safety zones or high aircraft

noise zones associated with that airport. Therefore, the proposed project would not result in a safety hazard for people residing or working in the project area, and no impacts would occur.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. There are no designated critical facilities or lifeline systems on or near the project site, as shown on the City's "Critical Facilities & Lifeline Systems" map, in Exhibit H of the Safety Element of the General Plan. Sepulveda Boulevard is identified as a "Selected Disaster Route." These routes are defined as "primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes." The Proposed Project would not alter the physical structure of Sepulveda Boulevard and would not significantly affect the street's ability to support the functions of a selected disaster route. The Project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way. During construction, the nearest travel lane could be temporarily closed for a period of up to 20 days, while the frontage is re-constructed and utility connections are being made. As required by the LADOT Transportation Impact Assessment letter dated February 22, 2021 included in Appendix I, through routine construction traffic control measures that would be imposed on the construction contractor through the City's building permit process, as would be the case for any new development project that would require a temporary travel lane closure, through traffic and accessibility by emergency response vehicles and crews would be maintained at all times. This would avoid a significant impact to emergency response functions along Sepulveda Boulevard for that short period of time when the near travel lane is closed.

The City's emergency preparedness plans and procedures are focused on optimizing and coordinating communications, decisions, allocations of resources and responses to various emergency circumstances by various City and County public agencies.[6] Additionally, emergency access to and from the project site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). The Proposed Project would have no effect on those processes, and impacts would be less than significant.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. A significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. The project site is located in a highly urbanized area of the City and the area surrounding the project site is completely developed. The project site is not located within an area classified by California Department of Fire and Forestry) as a wildland fire hazard area (CalFIRE 2020), and according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit D and Environmental and Public Facilities Map (1996). There are no wildlands in this fully urbanized area; therefore, this project could not expose people or structures

[6] https://emergency.lacity.org/emergency-plans-and-annexes. Accessed September 22, 2020.

to a significant impact involving wildland fires. Please refer to the responses to Checklist item XX. Wildfire, for additional discussions regarding the absence of wildfire hazards.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations. Los Angeles County is split between two water quality regions: the Los Angeles Region and the Lahontan Region. Each Regional Water Quality Control Board

(LARWQCB) prepares and maintains a basin plan which identifies narrative and numerical water quality objectives to protect all beneficial uses of the waters of that region. The basin plans strive to achieve the identified water quality objectives through implementation of Waste Discharge Requirements (WDRs) and by employing three strategies for addressing water quality issues: control of point source pollutants, control of nonpoint source pollutants, and remediation of existing contamination. The project site is located in the Los Angeles Region and is, therefore, covered under the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

The project site is located within the Dominquez Channel watershed, and runoff in this watershed flows into the Wilmington Drain and Machado Lake receiving waters. Both of these are impacted by water pollutants identified as listed impairments under Section 303(d) of the Clean Water Act. Wilmington Drain is impacted by indicator bacteria, and Machado Lake is impacted by algae, ammonia, ChemA, chlordane, DDT, Dieldrin, Eutrophic, Odor, PCBs (polychlorinated biphenyls) and Trash.

Point sources of pollutants are well-defined locations at which pollutants flow into water bodies (discharges from wastewater treatment plants and industrial sources, for example). These sources are controlled through regulatory systems including permitting under California's WDRs and the National Pollutant Discharge Elimination System (NPDES) program; permits are issued by the appropriate RWQCB and may set discharge limitation or other discharge provisions.

According to the Basin Plan, nonpoint sources of pollutants are typically derived from project site runoff caused by rain or irrigation and have been classified by the USEPA into one of the following categories: agriculture, urban runoff, construction, hydromodification, resource extraction, silviculture, and land disposal. This type of pollution is not ideally suited to be addressed by the same regulatory mechanisms used to control point sources. Instead, California's Nonpoint Source Management Plan describes a three-tiered approach, including the voluntary use of BMPs, the regulatory enforcement of the use of BMPs, and effluent limitations. Generally speaking, each RWQCB implements the least restrictive tier until more stringent enforcement is necessary. The LARWQCB addresses on-site drainage through its construction, industrial, and municipal permit programs. These permits require measures to minimize or prevent erosion and reduce the volume of sediments and pollutants in a project's runoff and discharges based upon the size of the project site.

During the construction phase of a proposed project, the pollutants of greatest concern are sediment, which may run off the project site due to site grading or other site preparation activities, and hydrocarbon or fossil fuel remnants from the construction equipment. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in surface runoff. Accordingly, project construction activities could have the potential to result in adverse effects on water quality. However, construction runoff is regulated by the NPDES Construction General Permit, which requires identification of a variety of water quality control BMPs to be specified on construction plans and implemented throughout construction. Measures are required to keep stormwater out of construction zones, to conduct regular site maintenance and "good housekeeping practices" to prevent and minimize and dispose of solid and liquid wastes, to

capture and control any site runoff so that water pollutants don't enter storm drains, and to have response procedures in place in the event of accidental spills of water contaminants. This permit applies to all construction which disturbs an area of at least one acre and is administered by the RWQCB. Through this existing, mandatory regulatory compliance measure, potential water quality impacts during construction would be avoided or reduced to less than significant levels and would avoid conflicts with water quality standards established by the RWQCB.

Because the project would create, add or replace more than 500 square feet of impervious surface area, it is required to provide stormwater mitigation. In addition, the project is categorized by the Los Angeles County Low Impact Development (LID) Ordinance as a Designated Project, in the category of redevelopment, because it would construct more than 5,000 square feet of new building area, increase the amount of impervious surface area by 10,000 square feet, disturb more than one acre of land, involve an industrial land use, and create parking lot surfaces exceeding 10,000 square feet or more. For this type of project, the pollutants of concern include: suspended solids (driveways, rooftops, sidewalks, paved areas, and landscaping), nutrients (fertilizers, wastes, garbage), heavy metals (cars, trucks, parking areas), pathogens (waste, garbage), pesticides (landscaped areas), oil and grease (vehicles, parking areas), toxic organic compounds (cars and trucks), trash and debris (trash enclosures, parking areas). The proposed project would be required to comply with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. The ordinances contain requirements for construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all projects consistent with the City's landscape ordinance and other related requirements. As a result, the project would be required to prohibit the discharge of pollutants from the project site and to meet the requirements of the City's LID Standards Manual, including the installation and maintenance of post-construction treatment controls and BMPs. Structural and non-structural BMPs identified in the preliminary LID Plan to be implemented by the project include the following:

- Provide storm drain system stenciling and signage
- Design and construct trash and waste storage areas to reduce pollution introduction
- Use efficient irrigation systems and landscape design, water conservation, smart controllers, and source control
- Loading dock maintenance, including special surfacing, covers and hydraulic isolation/drainage.
- Education for property owners, tenants and occupants
- Activity restrictions
- Common area landscape management
- Common area litter control
- Common area catch basin inspection
- Sweeping of internal drives and parking areas

The Los Angeles County LID Ordinance is designed to promote sustainability and improve the County's watersheds by preserving drainage paths and natural water supplies in order to "retain, detain, store, change the timing of, or filter stormwater or runoff." Consistent with the provisions of the County's and City's LID standards, all Designated Projects must control runoff through

infiltration, bioretention, biofiltration, and/or rainfall harvest and use. A percolation test was performed at the project site, which determined that the site's soils yielded low infiltration rates within the upper 25 feet. This makes shallow infiltration infeasible. However, soils were observed to become more granular below 30 feet, and the infiltration test at 30 feet yielded high infiltration rates. Therefore, as recommended by the geotechnical engineer, onsite infiltration would be achieved by installing drywells extending to a minimum depth of 40 feet below grade. Dry wells would be employed to meet the Low Impact Development criteria and provide infiltration of required runoff volumes. Any excess runoff would be conveyed via on-site storm drain system to MS4 located within the public Right-of-Way.

With conformance to the City's LID requirements and incorporation of required construction and post-construction BMPs, the project would not result in violation of any water quality standards or waste discharge requirements would occur and impacts would be less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially deplete groundwater or interferes with groundwater recharge. According to the geotechnical investigation conducted for the project, soil borings were drilled to a maximum depth of 51 feet, in which no groundwater was encountered (see Appendix E). Additional research determined that several water wells are present within about a 1.7 mile radius of the site. Well data dating back to 1934 indicates water levels in the area at depths in excess of 50 feet with most recent water levels in the range of 80 feet below the ground surface. There are no water wells on site and this site does not support any groundwater resources managed for the production of potable or other water supplies.

Proposed grading would include excavation and removal of unsuitable fill materials, extending up to 5 to 6 to feet deep across the project site. Therefore, it is not anticipated that project construction would require dewatering or other withdrawals of groundwater. Accordingly, project construction would not deplete groundwater supplies or interfere with groundwater recharge.

When fully built and operational, the proposed project would not decrease ground water supplies or interfere with groundwater recharge. The project would rely totally on a piped-in water supply from Los Angeles Department of Water and Power, and there would be no reliance on any existing or new groundwater extraction wells. The project site is located in an urbanized area and is currently developed with five small buildings surrounded by impervious surfaces that cover a large majority of the site. The project would replace existing site improvements that cover approximately 76 percent of the site with impervious surfaces, with a 174,211 square-foot concrete warehouse/office building with adjacent impervious pavement and landscaping for added visual buffering and softening of the project hardscapes. These improvements would expand the amount of impervious surfaces to approximately 91 percent of the site, resulting in a minor decline in rainwater infiltration. That would be offset with the proposed drainage system improvements that would convey some of the runoff into infiltration wells for infiltration purposes. As such, the project would not substantially affect groundwater levels beneath the project site. Therefore, the project

would not deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The project would have a less than significant impact on sustainable groundwater management of the basin.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river so that erosion or siltation would result. There are no streams or rivers located in the project vicinity. Current site drainage sheet flows to nearby gutters and catch basins where it is routed offsite towards the southeastern portion of the site where it connects to the public storm drain system. For one of the existing drainage areas, water sheet flows offsite into the public right of way.

Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with construction-related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions.

The Proposed Project would regrade the site into two primary drainage areas. The western portion would drain to catch basins located within the loading dock area. The eastern would drain southeast to nearby catch basins. Some site runoff would be conveyed to infiltration wells for infiltration purposes. Excess runoff (restricted to the existing condition runoff leaving the site) would be conveyed to MS4 within the public right of way. Total impervious surface areas would increase from approximately 76 percent of the site to approximately 91 percent of the site and the rest would be landscaped with groundcovers, shrubs and trees; this would decrease the potential for erosion, compared to existing conditions. The proposed modifications to surface drainage patterns would be minor and controlled through the proposed storm drainage facilities. There are no streams or rivers or any kind of drainage course on or near the site and thus the project would not involve any alterations to such drainage areas. With some stormwater conveyed to proposed infiltration wells, net site runoff to the adjacent street would be no more than under current conditions; therefore, the project runoff would not have an effect on stormwater flows into downstream water courses. Impacts of the Proposed Project would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. There are no streams or rivers located in the project vicinity. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are

currently receiving surface water runoff under existing conditions. Impermeable surfaces resulting from the development of the project would not substantially change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. The proposed storm drainage system is designed to capture and control runoff for a 25-year storm frequency event. The system would regulate site runoff to ensure that the rate and amount of surface runoff conveyed to MS4 would not increase from the pre-developed condition and would be within the limits established by the City's hydrology design criteria. As a result, the Proposed Project would result in less-than-significant impacts related to the alteration of drainage patterns and on- or off-site flooding.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the project site, or if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system. Site-generated surface water runoff would continue to flow to the City's storm drain system. Any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance or alternatively, the City's Standard Urban Stormwater Mitigation Plan (SUSMP), as an LAMC requirement to address water runoff and storm water pollution.

Site runoff currently flows onto the Sepulveda Boulevard public right-of-way of where it is routed into LACFCD Storm Drain Line BI 0661 via the existing curb and gutter. That storm drain line confluences into LACFCD Channel PD 0553 [Bixby Slough], a Reinforced Cement Concrete channel. The channel eventually confluences into LACFCD Storm Drain Line BI 9827 - U3 Line A- Torrance which then confluences into LACFCD Channel Wilmington Drain, a Reinforced Cement Concrete Channel. Wilmington Drain discharges into Harbor Lake, which is not susceptible to hydromodification impacts.

The proposed site improvements would result in decrease in peak flow rates, however there would be an increase in runoff volumes. That increase would be less than the project's LID required mitigated volume (infiltrated on site), therefore detention would not be required for proposed condition. This will ensure that site runoff does not exceed the capacity of the municipal storm drainage facilities noted above and would not result in increased pollutant loads to those facilities. Project impacts would, therefore, be less than significant.

iv. Impede or redirect flood flows?

No impact. A significant impact would occur if the proposed project would be located within a 100-year or 500-year floodplain or would impede or redirect flood flows. The project site is not located within a flood hazard area, as indicated on the Federal Emergency Management Agency's Flood Insurance Rate Map for this area.[7] According to the Safety Element of the City of Los

[7] Federal Emergency Management Agency. Flood Insurance Rate Map Number 06037C1935F, September 26, 2008.

Angeles General Plan Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit F, the project site is not located within a 100-year or 500-year floodplain. Therefore, the proposed project would not be located in such areas, and no impact related to flood zones would occur.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the down slope movement of soil and/or rock under the influence of gravity. The project site and the surrounding areas are not located near a water body to be inundated by seiche. As noted in the preceding response, the project site is not located in a flood hazard zone. Given the site location approximately 5.1 miles inland from the Pacific Ocean, it is not subject to potential tsunami hazards. There are no water bodies on or near the site; therefore, there is no risk of any release of pollutants due to a seiche occurring in a body of water that could inundate the project site. The project site is not located within a potential dam inundation area, as those are defined by the California Division of Safety of Dams.[8] Therefore, the project would have no impact related to inundation by seiche, tsunami, or mudflow.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. A significant impact would occur if the proposed project conflicts with or obstructs implement of a water quality control plan or sustainable groundwater management plan, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB). Please refer to the previous responses to threshold (**a)** regarding project compliance with the water quality control plan set forth in the RWQCB Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.

In 2014, the California Legislature and Governor passed the Sustainable Groundwater Management Act (SGMA) which encourages local agencies to take a leading role in managing their local groundwater resources. The intent of the SGMA is to require sustainable groundwater management practices statewide, which will provide a buffer against drought and climate change.

The California Department of Water Resources (DWR) has prioritized all groundwater basins according to the following criteria established in California Water Code Section 10933(b):

1. The population overlying the basin
2. The rate of current and projected growth of the population overlying the basin
3. The number of public supply wells that draw from the basin
4. The total number of wells that draw from the basin
5. The irrigated acreage overlying the basins

[8] California Department of Water Resources, Division of Safety of Dams, Dam Breach Inundation Maps. October 2015.

6. The degree to which the overlying population rely on groundwater as their primary source of water
7. Documented impacts, including overdraft, subsidence, saline intrusion, and other water quality degradation
8. Other information determined to be relevant by DWR, including adverse impacts on local habitat and local stream flows.

The possible rankings are very low, low, medium and high. SGMA compliance requires that local agencies from Groundwater Sustainability Agencies (GSAs) for medium and high priority groundwater basins no later than June 30,2017 and adopt a Groundwater Sustainability Plan (GSP) no later than January 31, 2022.

The City of Los Angeles participates as a GSA for the Owens Valley and Santa Monica Basins. The project site is not located in either of these basins; therefore, the proposed project would have no impact on a GSP. Further, as discussed in the earlier response to threshold (b), the proposed project would have a less than significant impact on groundwater resources.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a. Physically divide an established community?

No Impact. A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community can be caused by blocking through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on opposite sides of the freeway. The proposed project would not involve any street vacation or closure, and it would not result in development of new thoroughfares or highways. All proposed development would occur within the boundaries of the project site, except for possible connections to existing utility infrastructure in the adjacent street right-of-way. There would be no alterations to any surrounding land. The proposed project would not physically divide an established community. Therefore, no impact would occur.

Further, the project would not divide an established community in terms of use. The project site is located within a fully urbanized area, with a complete street and utility network, sidewalks, overhead power lines and a mixture of land uses, and is already developed, including with a concrete batch plant, and has previously been utilized as an industrial use. The project is located within an industrial area that is surrounded to the west and north by industrial zones, and to the southeast by industrial zones. The property is bordered to the south by Sepulveda Avenue, a Boulevard II roadway, and to the south of Sepulveda Boulevard directly across from the site is an oil well facility in the R1-1XL-O zone. To the east and west of the oil well facility along Sepulveda Boulevard are the rear lots of single-family homes in the R1-1XL-O zone. Immediately east of the subject site is a property that is zoned (T)(Q)C2-2D zone, which was rezoned from M3-1VL to allow for construction of a 6-story multi-family residential development, which development requires that all residents provide signed acknowledgements that they are located adjacent to industrial zones that allow industrial uses. Developed commercial sites containing food services and retail businesses are also located immediately to the east. Therefore, developing the site with a warehouse use is consistent with zoning, past uses on site, and surrounding uses. The proposed project would not divide an established community and no impact would occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The site is located in the Harbor Gateway Community Plan with a General Plan Land Use designation of Light Manufacturing and Heavy Manufacturing. The site is zoned MR2-1VL, M2-1VL, and M3-1VL. The proposed project's warehouse building which may be used for either standard warehousing or last-mile delivery would be consistent with both the land use designation of the General Plan as well as the zoning identified in the Los Angeles Municipal Code. These land use designations and zoning classifications were established to foster a range of industrial land uses to support the local economy. No variances or exceptions from zoning requirements are being proposed or requested.

All aspects of the project would be consistent with the land use intensity standards set forth in the Municipal Code for the zoning classifications on site. For example, buildings may not exceed a height of 45 feet or three stories-- the proposed warehouse building would be no more than 44 feet high, in a one level structure, with 4,958 square feet of mezzanine level office space. The maximum floor area ratio (FAR) under the zoning code is 1.5:1; the proposed FAR is approximately 0.543:1, and therefore within the FAR limits. The project provides over 9.1 percent of the site to be planted with landscape materials; zoning does not require a minimum landscape requirement. A total of 163 passenger vehicle parking spaces would be provided, exceeding the minimum of 71 required by the City's development standards. This would include spaces designed in accordance with the Americans With Disabilities Act, and spaces to support electrically powered vehicles. A total of 38 bicycle parking spaces would be provided, for short term and long term bicycle parking needs.

The Harbor Gateway Community Plan includes a number of policies and objectives for land use within the 3,229 acres that links the City's harbor, San Pedro, Wilmington and Harbor City communities to the main area of the City (Harbor Gateway Community Plan). An overall objective of the plan, with respect to industrial land uses, is to encourage the inclusion of environmentally sensitive industrial uses within the industrial areas and prevent commercial uses from intruding into planned industrial areas. The project is located adjacent to existing industrial uses to the west and north. It recognizes that there are opportunities in this area to attract industrial uses due to excellent access to the regional freeway network which will provide job opportunities by taking advantage of suitable large sites to support a variety of job-producing uses. Under the current Community Plan, the project site is designated for Light and Heavy Manufacturing land uses and the site will remain in an area that is zoned for and encouraged to be industrial use in the upcoming Harbor Gateway Community Plan (Department of City Planning, May 2019).

With automobile parking spaces arranged around the site perimeter, with landscape buffers and on all sides and perimeter walls along the three sides that border adjacent land uses, the project is consistent with the Community Plan policy regarding design of off-street parking areas, which says:

> "Off-street parking should be provided consistent with the Municipal Code as the minimum. Off-street parking areas shall be located at the peripheries of industrial sites to serve as buffers and shall be separated from adjacent private and public uses by at least a wall and/or landscaped setback sufficient to screen the industrial operation from view." (Harbor Gateway Community Plan, p. III-3).

Since the project site is adjacent to numerous other industrial uses that are concentrated in this area, the project is consistent with the Community Plan policy that says:

> "Wherever possible, industrial uses should be concentrated in industrial parks." (Harbor Gateway Community Plan, p. III-3).

As such, the proposed warehouse will be consistent with the existing and updated Harbor Gateway Community Plan designation and policies.

The proposed warehouse project is also consistent with the following goals, objectives, and policies of the General Plan:

> Goal 3J - Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.
>
> Objective 3.14 - Provide land and supporting services for the retention of existing and attraction of new industries.
>
> Policy 3.14.1 - Accommodate the development of industrial uses in areas designated as Industrial -Light, "Industrial-Heavy," and "Industrial-Transit."

The project site is designated for light and heavy industrial uses, which includes warehouses.

Under the City's zoning regulations, the project site is designated as M2 (Light Industrial), M3 (Heavy Industrial) and MR2 (Restricted Light Industrial). The zoning code states a number of purposes of the MR2 zone, including:

> To protect industrial land for industrial use, and prohibit unrelated commercial and other non-industrial uses
>
> Upgrade industrial development standards
>
> To preserve industrial land for light industrial uses and non-retail businesses which will enhance the City's employment base

The proposed Project will achieve each of these purposes. Further, the proposed project would be a standard warehouse or last mile delivery warehouse and both uses are consistent with the site's zones.

The Los Angeles City Planning Commission adopted Citywide Design Guidelines on October 24, 2019. The intent was to communicate the City's design expectations, facilitate fair and consistent

application of the design objectives and to encourage the development of projects appropriate to the context of the City's climate and urban environment. Accordingly, the Proposed Project has been designed to address and comply with these guidelines, as follows.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.

The project promotes a safe, comfortable and accessible pedestrian experience in a number of ways.

The project is oriented with the office area adjacent to the street frontage for visibility and ease of pedestrian access. An aesthetically pleasing pedestrian circulation path will connect the primary office building entry to the sidewalk/right of way in compliance with accessibility requirements for the site. The pedestrian circulation will be visible and well-lit to provide safety for the occupants. The pedestrian linkage will be shaded and traverse a landscaped outdoor employee break area with a variety of plantings and seating area for an elevated experience. In total, approximately 104 trees are proposed for the site.

Pedestrian and bicycle circulation are separated from auto and truck circulation to increase pedestrian safety. Short term bicycle parking will be provided outside the primary office entrance, with long term bicycle parking located within the building for security.

The architecture of the building has been scaled for a comfortable pedestrian experience. The project's facade incorporates varying reveals, texture and paint changes to minimize the overall scale of the building and emphasize a human scale experience. Canopies are incorporated throughout the façade in varying sizes picking up the more human scale typical of a residential use.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Trucks will enter and exit the site only from the western driveway, which will be a separate access point from cars to provide a safe separation for both pedestrians and auto vehicles. Auto entry will be provided from the eastern driveway. Parking is provided in a relatively small grouping alleviating pedestrians from interacting with heavy traffic flow within the parking lot.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

A landscaped employee amenity area is provided at the front of the building that will activate the exterior of the building and provide connectivity with the pedestrian public sidewalk to engage with the surrounding community. The project is oriented as a welcoming experience along the street frontage, with numerous shade trees and variety of plantings along Sepulveda Boulevard.

The scale of the project has been modeled on a residential townhouse, rather an industrial or commercial space, to maintain a human scale. Window openings are broken into smaller

groupings through the use of reduced opening sizes and decorative mullions. Canopies are incorporated throughout the façade in varying sizes picking up the more human scale of a residential project.

Additionally, the project incorporates varying reveals, texture and paint changes to minimize the overall scale and emphasize a human scale experience.

Guideline 4: Organize and shape projects to recognize and respect surrounding context.

The site plan for the project was purposefully designed in consideration of, and respect for, surrounding uses.

The project's truck loading area was intentionally located on the western side of the site, adjacent to existing industrial uses, to allow the building to act as a visual and sound buffer between the truck loading area on the west and the multifamily residential use on to the east. The truck dock would be inset into the building, with the southern end of the building extending west along the edge of the loading area, thus screening and buffering view of the truck activities from Sepulveda Boulevard. The truck loading area would be gated for security purposes, which would also provide a visual and noise screen. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse building, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

On the eastern side of the property, the building would be setback 60 feet from the property line and will include a 12 foot landscape area on the eastern property boundary with a row of 30 trees, all of which will further buffer the project from the adjacent site. The eastern side of the building will include parking only and have no building access (only required emergency fire doors are proposed), further limiting activity on the eastern side. The east side of the building has also been designed to be especially sensitive to adjacent multifamily residential use by limiting large commercial glass expanses that can tend to cause glare. The articulation that provides the human scale described above in Guideline 3 is also utilized along the eastern façade.

As described above, the public facing front of the site has been designed to be visually appealing and pedestrian friendly. The project includes an outdoor employee break area with seating in a landscaped setting at the front of the building, which both provides a buffer to set back the building from Sepulveda Boulevard, and provides an appealing landscaped site frontage with numerous shade trees. There will be pedestrian connections within this landscape area from the street to the proposed employee office area, thereby providing easy access for building employees to the public sidewalk. The building's ancillary office area will feature high-end materials and design, including glass facades, adding new modern architecture to Sepulveda Boulevard and providing easily recognizable entrances.

Guideline 5: Express a clear and coherent architectural idea.

Whereas most industrial warehouses lead with a large scale sleek office and industrial look, the proposed project is focused on a human scale bespoke contemporary aesthetic. This is achieved through the use of a palette utilized frequently in residential architecture, cornice and awning treatments, reduced use of glass and enhanced articulation along the street frontage at a much smaller scale. These architectural features read as a residentially sensitive and architecturally contemporary project.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

As the building sits within the existing context of the community, a soft landscaped buffer is provided between the right of way and the building frontage with extensive use of trees and a large outdoor seating area. This provides a friendly parklike area for the community's view as they travel, work and live around this project. These parklike features are visible from the public sidewalk and connect to the building frontages with pedestrian and bike circulation walkways. The outdoor seating area allows users of the building to engage with the outdoors during, before and after their time at work so they can engage with the community environment and activation along the street.

Guideline 7: Carefully arrange design elements and uses to protect site users.

The site is intentionally designed to separate dissimilar vehicles from interacting. Truck traffic solely enters and exits via the western drive. The check in gate for the truck court is setback from the street right of way to provide ample room for trucks to drive onto the property and keep them out of the way of pedestrians on the public sidewalk. Auto access is located at the eastern drive entry. Lastly, pedestrian and bicycles have their own separate building access between the two vehicle drives supporting safe access for all users.

Guideline 8: Protect the site's unique natural resources and features.

As this is an infill site that was previously developed, fully paved, and included outdated buildings there are not significant natural resources to be maintained. The site's construction will meet current California guidelines for recycling and waste management to ensure a clean redevelopment. The project provides new pedestrian connectivity to street frontage that is currently missing.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

Energy efficient, low glare glazing is proposed that will provide daylight for the building users. The project meets the stringent guidelines of California title 24 including the use of recycled materials, water efficient plumbing fixtures, low energy usage fixtures, and high efficiency rooftop units. Native, drought tolerant landscaping will be provided to keep landscaping cohesive with surroundings and to conserve water.

Guideline 10: Enhance the green features to increase opportunities to capture stormwater and promote habitat.

The project incorporates landscape basins along the east and western property lines that will be utilized to capture stormwater. A significant landscape buffer is proposed along the street frontage of various plant species. Throughout the site drought tolerant plant material and water conserving irrigation methods have been incorporated to provide green features that promote the local plant habitat.

Since the proposed project would be consistent with the City's land use policies and zoning regulations, there would be no impact related to land use consistency.

As discussed in Section VIII. Greenhouse Gas Emissions, the project is also consistent with the 2020-2045 RTP/SCS.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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. A significant impact would occur if the Proposed Project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The City depends on the State of California's Geological Survey (State Department of Conservation, Division of Mines and Geology) to identify deposits of regionally significant aggregate resources. These clusters or belts of mineral deposits are designated as Mineral Resources Zones (MRZ-2s), with the sand and gravel deposits located along the flood plain from the San Fernando Valley through downtown. The project site is not mapped within any MRZ zones by the State or in the Conservation Element of the City's General Plan. The Conservation Element also identifies oil resources located throughout the City's planning area, including the project site and surroundings. This mapping of oil resources was done over 20 years ago, and the project site is not identified in the City's current Zoning Map as within an Oil Drilling District or a Surface Mining Operations District.

The site is located within the Torrance Oil Field and Major Oil Drilling Area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit E and Environmental and Public Facilities Map (1996). The site is zoned MR2-1VL, M2-1VL, and M3-1VL, and is therefore not within an Oil Drilling District (any zone classification with an "O" at the end). The project site does not currently and has not historically supported any surface mining activities, and there are no such activities occurring in the vicinity of the project site. There are no active oil wells on-site, according to the California Geologic Energy Management Division's (CalGEM) database of known well sites. This website shows that while there were previously 6 oil wells located on the project site, all of them have since been plugged and abandoned. No application for the extraction and production of mineral resources is being considered under the subject project application; the subject request is for a warehouse building. As there are no mineral resources located within the project site and it is not zoned as either an Oil Drilling District

or Surface Mining Operations District, the proposed warehouse project would have no effect on any known mineral resources.

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. Implementation of the proposed project would not 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. The site is zoned MR2-1VL, M2-1VL, and M3-1VL, and is therefore not within an Oil Drilling District (any zone classification with an "O" at the end). As stated above, the project site is not designated within an Oil Drilling District or Surface Mining Operations District in the City's Zoning Map, and is not classified in any kind of Mineral Resource Zone as delineated by the California Department of Conservation or in the City's General Plan Conservation Element. The Proposed Project for the development of a warehouse building would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The following analysis summarizes and incorporates by reference the information provided in the Noise Measurements and Modeling Worksheets prepared by Michael Baker International, which is provided as Appendix H to this IS/MND.

DESCRIPTION OF NOISE METRICS

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by

mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

REGULATORY FRAMEWORK

State of California

The State Office of Planning and Research (OPR) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of CNEL.

City of Los Angeles

<u>General Plan</u>

The California Government Code requires that a noise element be included in the general plan of each county and city in the State. The Noise Element of the Los Angeles City General Plan (Noise

Element) provides a description of existing and projected future noise levels, and incorporates comprehensive goals, policies, and implementing actions to ensure that the City of Los Angeles (City) residents are protected from excessive noise. The applicable actions and policies to minimize the harmful effects of noise obtained from the Noise Element are as follows:

- **Objective 2 (Nonairport)**: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.
    - **Policy 2.2**: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

- **Objective 3 (Land Use Development)**: Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.
    - **Policy 3.1**: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

The General Plan also provides noise standards for acceptable conditions based on State recommendations and City land use designations. The City uses the noise/land use compatibility guidelines presented in **Table XIII-1**, *Land Use Compatibility for Community Noise Exposure*. These standards, which use the CNEL noise descriptor, are intended to be applicable for land use designations exposed to noise levels generated by transportation-related sources.

TABLE XIII-1
LAND USE COMPATIBILITY FOR COMMUNITY NOISE EXPOSURE

Land Use Category	Day-Night Average Exterior Sound Level (CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential Single Family, Duplex, Mobile Home	50 - 55	55 - 70	70 - 75	75 - 85
Residential Multi-Family	50 - 60	60 - 70	70 - 75	75 - 85
Transient Lodging, Motel, Hotel	50 - 60	60 - 70	70 - 75	75 - 85
School, Library, Church, Hospital, Nursing Home	50 - 60	60 - 70	70 - 80	80 - 85
Auditorium, Concert Hall, Amphitheater	NA	50 - 70	65 - 70	70 - 85
Sports Arena, Outdoor Spectator Sports	NA	50 - 75	70 - 75	70 - 85
Playground, Neighborhood Park	50 - 70	NA	65 - 80	75 - 85
Golf Course, Riding Stable, Water Recreation, Cemetery	50 - 70	NA	70 - 80	80 - 85
Office Building, Business, Commercial, Professional	50 – 70	65 - 80	75 - 85	NA
Agriculture, Industrial, Manufacturing, Utilities	50 – 75	70 - 80	75 - 85	NA

Land Use Category	Day-Night Average Exterior Sound Level (CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable

Notes: NA = Not Applicable, CNEL = Community Noise Equivalent Level

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

Source: Noise Element of the Los Angeles City General Plan, *Exhibit I: Guidelines for Noise Compatible Land Use*, 1999; State of California Governor's Office of Planning and Research, General Plan Guidelines, July 2017.

Municipal Code

City of Los Angeles Municipal Code (Municipal Code) Chapter 11, *Noise Regulation*, contains the City's noise control regulations. The following sections of the Municipal Code are applicable to the proposed project:

Section 112.02. Air conditioning, refrigeration, heating, pumping, filtering equipment.

> *(a) It shall be unlawful for any person, within any zone of the city to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than five (5) decibels.*
>
> *(b) This section shall not be applicable to emergency work as defined in Section 111.01(c) of this chapter, or to periodic maintenance or testing of such equipment reasonably necessary to maintain such equipment in good working order.*

Section 112.04. Powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices.

> *(a) Between the hours of 10:00 p.m. and. 7:00 a.m. of the following day, no person shall operate any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery, equipment, or other mechanical or electrical device, or any hand tool which creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of a residence.*
>
> *(b) Except as to the equipment and operations specifically mentioned and related elsewhere in this Chapter or for emergency work as that term is defined in Section 111.01(d), and except as to aircraft, tow tractors, aircraft auxiliary power units, trains and motor vehicles in their respective operations governed by State or federal regulations, no person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.*

Section 112.05. Maximum noise level of powered equipment or powered hand tools.

> *Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:*

(a) 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75dB(A) for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors;

The noise limits for particular equipment listed above in (a), (b) and (c) shall be deemed to be superseded and replaced by noise limits for such equipment from and after their establishment by final regulations adopted by the Federal Environmental Protection Agency and published in the Federal Register.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 114.03. Vehicles – loading and unloading.

(a) It shall be unlawful for any person, between the hours of 10:00 p.m. and 7:00 a.m. of the following day, to load or unload any vehicle, or operate any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building.

(b) Irrespective of the provisions of Subsection (a), loading or unloading of vehicles of the type of activity referred to in Subsection (a) may occur between the hours of 6:00 a.m. to 11:00 p.m. of the same day pursuant to a permit issued by the Department of Transportation in accordance with a business program as defined by said department. This permit program would be limited to the area bounded by Western Avenue, Santa Monica Freeway, Central Avenue, and the San Diego Freeway, within the limits of the City of Los Angeles. Such permits will not be issued to high-noise businesses such as trash pickup.

In addition, noise due to construction work is regulated by Section 41.40, *Noise Due to Construction, Excavation Work – When Prohibited* of the Municipal Code as follows:

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure,

where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

(b) The provisions of Subsection (a) shall not apply to any person who performs the construction, repair or excavation work involved pursuant to the express written permission of the Board of Police Commissioners through its Executive Director. The Executive Director, on behalf of the Board, may grant this permission, upon application in writing, where the work proposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption during the hours mentioned above, or where the building or structure involved is devoted or intended to be devoted to a use immediately related to public defense. The provisions of this section shall not in any event apply to construction, repair or excavation work done within any district zoned for manufacturing or industrial use sunder the provisions of Chapter I of this Code, nor to emergency work necessitated by any flood, fire or other catastrophe.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specified. The provisions of this subsection shall not apply to persons engaged in the emergency repair of:

1. Any building or structure.

2. Earth supporting or endangering any building or structure.

3. Any public utility.

4. Any public way or adjacent earth.

EXISTING CONDITIONS

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are

considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptors are multi-family residential development (Seacrest Homes Apartments) adjacent to the east of the project site. This residential development is located in a C2 zone, which was rezoned from the prior industrial zone to allow for construction of the multi-family residential development. As a condition of approval of the zone change for this residential development (Council File 14-0869; Case Number CPC-2009-542-GPA-ZC-HD-ZV-ZAA-SPR), all residents of the Seacrest Homes Apartments are required to provide signed acknowledgements that they are located adjacent to industrial zones that allow industrial uses, as follows:

> Condition 19.C. The Project Applicant shall provide all prospective residents of the proposed apartment project with a disclosure statement acknowledging the Project is located adjacent to an area zoned for and improved with industrial land uses that have the potential to generate noise levels during the late evenings and early morning hours. Signed disclosure statements shall be procured by the leasing agent prior to the execution of any residential lease agreements. (Ordinance 183466)

The proposed building would be setback 60 feet from the eastern property line and would include a 12-foot landscape area on the eastern property boundary with a row of more than 30 new Chiltalpa and African Sumac trees. Although the row of trees is anticipated to provide some buffering of operational noise generated by the Project, no noise reduction is assumed or taken in the noise analysis. In addition, the nearest single-family residences are located approximately 110 feet to the south of the project site across Sepulveda Boulevard.

Existing Noise Sources

The project site is located within an urbanized area. The primary sources of stationary noise in the project vicinity include Heating Ventilation and Air Conditioning (HVAC) units on nearby buildings and parking areas. The noise associated with these sources may represent a single-event noise occurrence or short-term or long-term continuous noise. The primary source of mobile noise in the project area is generated from vehicles traveling along Sepulveda Boulevard. The Project site is a vacated family entertainment center with no ongoing activities and does not generate noise at this time.

Existing Ambient Noise Levels

In order to quantify existing ambient noise levels in the project site, three 24-hour long-term noise measurements were taken by Vista Environmental on October 13 and October 14, 2020; refer to **Table XIII-2**, *Noise Measurements*. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. The noise measurement results represent ambient noise levels at the nearest sensitive receptor locations.

TABLE XIII-2
NOISE MEASUREMENTS

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Start Time
1	East of project site, near northwest corner of Seacrest Homes Apartments	51.8	40.3	75.8	109.1	12:28 p.m.
2	East of project site, adjacent to south side of Seacrest Homes Apartments	56.5	44.2	81.3	110.5	12:35 p.m.
3	South of project site, south of Sepulveda Boulevard	70.9	70.7	71.4	89.8	12:48 p.m.

Source: Vista Environmental, October 13 and 14, 2020.

Meteorological conditions were clear skies, warm temperatures, with light wind speeds (3 to 6 miles per hour), and low humidity. Noise monitoring equipment used for the ambient noise survey consisted of three Larson Davis SoundTrack LxT sound level meters. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I (precision) sound level meters. The results of the field measurements are included in Appendix H.

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

CONSTRUCTION

Less Than Significant With Mitigation Incorporated. Construction of the proposed project would occur over approximately 13 months and would include demolition, grading, building construction, paving, and architectural coating. In addition, the re-abandonment of the three oil wells on-site would take approximately six weeks between demolition and grading phases. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment used by the project are shown in **Table XIII-3**, *Noise Levels Generated by Construction Equipment*. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

TABLE XIII-3
NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT

Type of Equipment	Acoustical Use Factor[1]	L_{eq} at 50 Feet (dBA)
Concrete Saw	20	83
Crane	16	71
Concrete Mixer Truck	40	75
Concrete Pump	20	74
Backhoe	40	74
Dozer	40	78
Drill Rig	50	77
Excavator	40	77
Forklift	40	71
Paver	50	74
Pump	50	78
Roller	20	73
Tractor	40	80
Water Truck	40	76
Generator	50	78
Grader	40	81
General Industrial Equipment	50	82

Note:

Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

The potential for construction-related noise to affect nearby sensitive receptors would depend on the location and proximity of construction activities to these receptors. As noted earlier, the closest sensitive receptors are the residential apartment units located adjacent to the east of the project site, and single-family homes, located approximately 110 feet to the south across Sepulveda Boulevard. According to the Los Angeles Municipal Code Section 41.40, construction activities

are only allowed between the hours of 7:00 a.m. to 9:00 p.m. on Mondays through Fridays, and the hours of 8:00 a.m. to 6:00 p.m. on Saturdays unless with written permission of the Board of Police Commissioners through its Executive Director. There could be some late night/early morning construction work when concrete slabs are poured. Any such work would occur only with the City's authorization.

In addition, according to Los Angeles Municipal Code Section 112.05, noise from construction equipment shall not exceed 75 dBA at a distance of 50 feet, unless the compliance is technically infeasible, where technical infeasibility means that the noise standard cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment. As shown in **Table XIII-3**, construction noise would potentially reach 83 dBA L_{eq} at 50 feet, which would be considered to be a significant short-term impact. Therefore, construction noise control mitigation measures would be necessary. The project will implement standard best management practices such as equipping all machinery with appropriate mufflers, silencers or other noise reduction devices as recommended by the equipment manufacturers and will limit construction work to only those hours permitted by the City's Noise Ordinance and Los Angeles Municipal Code Section 41.40. Additional noise attenuation would be required, however, to ensure that temporary noise levels do not exceed 75 dBA $L_{eq.}$ Specifically, Mitigation Measure XIII-1 will require installation of a 10-foot sound wall along the eastern boundary of the project site to reduce construction noise levels by 8 dBA (FHA, 2016), and the mitigated construction noise level would be reduced to 75 dBA L_{eq}, which would not exceed the standard established by Municipal Code Section 112.05. In addition, construction would occur throughout the project site and would not be concentrated or confined in the area directly adjacent to sensitive receptors. Therefore, construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near adjacent sensitive uses for prolonged time periods. As such, with the implementation of the best management practices and regulatory compliance measures, along with Mitigation Measure XIII-1, short-term construction noise impacts of the project would be less than significant.

OPERATIONS

The warehouse building, site plan and operations have all been designed to minimize noise to adjacent uses. The truck loading bays are located at the western side of the building facing an adjacent industrial use. The truck dock would be inset into the building, with the southern end of the building extending west along the edge of the loading area, thus screening and buffering view of the truck activities from Sepulveda Boulevard. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse building, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

Trucks would enter through one driveway off of Sepulveda Boulevard on the west side of the Property, away from the apartment building to the east, and in line with the oil well facility to the

south. The truck loading area would be gated off for security purposes with a solid metal gate, which would also provide a visual screen and, when closed, sound attenuation.

On the eastern side of the property, the building would be setback 60 feet from the property line and would include a 12-foot landscape area on the eastern property boundary with a row of trees, all of which would further buffer the project from the adjacent site. Trucks would not utilize the eastern driveway, and the eastern side of the building would have no truck or employee access (with only emergency fire access doors as required), further limiting activity on the eastern side. The eastern side would be limited to car parking only, which represents a significant reduction in activity in this area compared to the Mulligan's Family Fun entertainment center that previously operated at this location.

Mobile Noise

Less Than Significant Impact. Future development generated by the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear. Based on the *Transportation Assessment of Point South Bay VII Project* (dated November 2020), the proposed project is projected to generate an increase of 1,095 daily trips, which includes 138 a.m. peak hour trips and 95 p.m. peak hour trips.[9] The existing and opening year (2022) with and without project average daily trips (ADT) along roadway segments in the project area were prepared by Gibson Transportation Consulting, Inc. in November 2020. These were based on traffic counts taken in November 2020 and factored up to account for declines due to the COVID-19 pandemic conditions that have substantially reduced traffic volumes. The ADT data was used to model noise levels from mobile sources with the Federal Highway Administration's Highway Noise Prediction Model (FHWA RD-77-108). The RD-77-108 model calculates the average noise level at specific locations based on traffic volumes, average speeds represented by the posted speed limit, roadway geometry, and site environmental conditions.

The traffic noise levels under "Existing Without Project" and "Existing With Project" scenarios are compared in **Table XIII-4**, *Modeled Existing and Existing Plus Project Traffic Noise Levels*. As shown under the "Existing Without Project" scenario, noise levels would range from approximately 63.2 dBA to 68.1 dBA at 100 feet from roadway centerline, with the highest noise levels occurring along Sepulveda Boulevard east of Normandie Avenue. The "Existing With Project" scenario noise levels would also range from approximately 63.2 dBA to 68.1 dBA at 100 feet from roadway centerline, with the highest noise levels occurring along Sepulveda Boulevard east of Normandie Avenue.

[9] Daily vehicle trips associated with the Project was calculated using the City of Los Angeles' VMT calculator version 1.3. It is noted that the VMT Calculator determined that the Project would result in 1,095 daily vehicle trips before available credits for bike parking and existing uses.

TABLE XIII-4
MODELED EXISTING AND EXISTING PLUS PROJECT TRAFFIC NOISE LEVELS

Roadway Segment	Existing Without Project					Existing With Project					Difference In dBA @ 100 Feet from Roadway Centerline
	ADT	dBA @ 100 Feet from Roadway Centerline	Distance from Roadway Centerline to Noise Contour: (Feet)			ADT	dBA @ 100 Feet from Roadway Centerline	Distance from Roadway Centerline to Noise Contour: (Feet)			
			70 CNEL	65 CNEL	60 CNEL			70 CNEL	65 CNEL	60 CNEL	
Sepulveda Boulevard											
West of Western Avenue	48,733	67.5	68	147	317	48,837	67.5	68	147	317	0.0
East of Western Avenue	53,911	68.0	73	157	339	54,124	68.0	73	158	340	0.0
West of Halldale Avenue	53,189	67.9	72	156	336	53,402	67.9	73	156	337	0.0
West of Normandie Avenue	53,715	68.0	73	158	340	54,597	68.0	74	159	343	0.1
East of Normandie Avenue	55,247	68.1	74	160	345	56,032	68.1	75	162	348	0.1
Western Avenue											
North of Sepulveda Boulevard	32,085	65.7	-	112	240	32,140	65.7	-	112	241	0.0
South of Sepulveda Boulevard	34,846	66.1	-	118	254	34,901	66.1	-	118	254	0.0
Normandie Avenue											
North of Sepulveda Boulevard	19,243	63.2	-	76	163	19,292	63.2	-	76	163	0.0
South of Sepulveda Boulevard	18,410	64.2	-	88	190	18,459	64.2	-	88	190	0.0

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level; - = Contour is located within the roadway right-of-way.

Source: Noise modeling is based on ADT data prepared by Gibson Transportation Consulting, Inc. in November 2020. Refer to Appendix A for modeling assumptions.

Table XIII-4 also shows the traffic noise level differences between the "Existing Without Project" scenario and the "Existing With Project" scenario. The proposed project would result in a maximum noise level increase of 0.1 dBA along Sepulveda Boulevard west and east of Normandie Avenue. The noise level increase would be negligible because the existing ADTs along Sepulveda Boulevard, Western Avenue, and Normandie Avenue are quite high, and the project-generated ADTs would represent relatively small increases. Therefore, the proposed project would not significantly increase mobile noise levels in the project area (i.e., noise increase would be less than 3.0 dBA) and the impact would be less than significant.

Cumulative Mobile Source Impacts

Less Than Significant Impact. Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the proposed project and other growth in this area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of project traffic to the future cumulative base traffic volumes in the project area and the vicinity.

The combined effect compares the "Opening Year 2022 With Project" condition to existing conditions. This comparison accounts for the traffic noise increase generated by a project combined with the traffic noise increase generated by cumulative projects. The following criteria have been utilized to evaluate the combined effect of cumulative noise increase:

- *Combined Effect*. A significant cumulative impact would occur if the cumulative with project noise level ("Opening Year 2022 With Project" condition) would increase the ambient noise levels measured at the property line of affected uses by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, or by 5 dBA CNEL within all other categories.

A significant impact would result only if both the combined (including an exceedance of the applicable exterior standard at a sensitive use) and incremental effects criteria have been exceeded. Noise, by definition, is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed project and growth due to occur in the site vicinity would contribute to cumulative noise impacts. **Table XIII-5**, *Cumulative Traffic Noise Levels*, lists the traffic noise effects along roadway segments in the project vicinity for "Existing", "Opening Year 2022 Without Project," and "Opening Year 2022 With Project" conditions, including combined and incremental impacts.

As indicated in **Table XIII-5**, the "Combined Effects" would not increase ambient noise levels by 3 dBA CNEL along any of the study area roadway segments. Further, the Project would not result in a considerable contribution to cumulative noise levels because the Project's maximum incremental effect (i.e., the difference between the "Opening Year 2022 With Project" condition and the "Opening Year 2022 Without Project" condition) would be 0.1 dBA CNEL above. This small increase in cumulative noise would be imperceptible to the human ear. Therefore, there would not be a significant cumulative impact and the Project would not result in a considerable contribution to cumulative noise levels.

TABLE XIII-5
CUMULATIVE TRAFFIC NOISE LEVELS

Roadway Segment	dBA @ 100 Feet from Roadway Centerline			Combined Effects	Incremental Effects	Cumulatively Significant Impact?[1]
	Existing	Opening Year 2022 Without Project With Cumulative Projects	Opening Year 2022 With Project With Cumulative Projects	Difference in dBA Between Cumulative With Project and Existing	Difference in dBA Between Cumulative With Project and Cumulative Without Project	
Sepulveda Boulevard						
West of Western Avenue	67.5	67.6	67.6	0.1	0.0	No
East of Western Avenue	68.0	68.0	68.1	0.1	0.0	No
West of Halldale Avenue	67.9	68.0	68.0	0.1	0.0	No
West of Normandie Avenue	68.0	68.1	68.1	0.2	0.1	No
East of Normandie Avenue	68.1	68.1	68.2	0.1	0.1	No

Roadway Segment	dBA @ 100 Feet from Roadway Centerline			Combined Effects	Incremental Effects	Cumulatively Significant Impact?[1]
	Existing	Opening Year 2022 Without Project With Cumulative Projects	Opening Year 2022 With Project With Cumulative Projects	Difference in dBA Between Cumulative With Project and Existing	Difference in dBA Between Cumulative With Project and Cumulative Without Project	
Western Avenue						
North of Sepulveda Boulevard	65.7	65.8	65.8	0.1	0.0	No
South of Sepulveda Boulevard	66.1	66.2	66.2	0.1	0.0	No
Normandie Avenue						
North of Sepulveda Boulevard	63.2	63.3	63.3	0.1	0.0	No
South of Sepulveda Boulevard	64.2	64.3	64.3	0.1	0.0	No

Notes: dBA = A-weighted decibel

Source: Noise modeling is based on ADT data prepared by Gibson Transportation Consulting, Inc. in November 2020. Refer to Appendix A for modeling assumptions.

Stationary Noise Impacts

Mechanical Equipment

Less Than Significant Impact. Heating Ventilation and Air Conditioning (HVAC) units would be installed on the southeast and southwest corners of the rooftop of the proposed building. Typically, mechanical equipment noise is 55 dBA at 50 feet from the source (Berger et al., 2010). Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. The nearest sensitive receptors are the multi-family residences approximately 60 feet to the east of the HVAC units on the southeast corner of the proposed building rooftop. As this distance, noise levels from the HVAC units could reach approximately 53 dBA at the nearest residences to the east. This level would be below the ambient noise level of 56.5 dBA L_{eq}, refer to **Table XIII-2**, and therefore would be consistent with the City's Municipal Code Section 112.02, which requires noise from HVAC units not exceed the existing ambient noise level by more than 5 dBA. In addition, noise from HVAC units would not exceed the City's normally acceptable noise level standard of 60 dBA CNEL for multi-family residences. Thus, a less than significant impact would occur in this regard.

Parking Areas

Less Than Significant Impact. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in **Table XIII-6**, *Typical Noise Levels Generated by Parking Lots*.

TABLE XIII-6
TYPICAL NOISE LEVELS GENERATED BY PARKING LOTS

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}
Source: Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991.	

It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than what is identified in **Table XIII-6**. The project would provide 163 vehicle parking spaces in surface parking located along the eastern, western, northern, and southern perimeters of the site. As shown in **Table XIII-6**, parking lot noise levels could range between 53 dBA and 61 dBA at 50 feet. The closest sensitive receptors are located approximately 15 feet east of the parking spaces along the eastern edge of the site. At this distance, parking noise levels would range from 63 to 71 dBA. It should be noted that parking lot noises would be much lower in the CNEL noise scale (i.e., the noise metric used by the Land Use Compatibility Guidelines to evaluate mobile noise impacts) which represents a time-weighted 24-hour average noise level based on A-weighted decibels. While parking lot noise may be as loud as 71 dBA, these noise levels would be short-term and intermittent. In addition, there is an existing surface parking lot located on the east side of the project site that is also close to the same apartment complex. Therefore, noise levels from parking lots of the project would not be different from the existing conditions and the impacts would be less than significant.

Trucks Deliveries

Less Than Significant Impact. The proposed project is a warehouse development that would generate regular truck deliveries. Truck loading and unloading activities would occur entirely indoors within the proposed building, and all forklift operations would be indoors, therefore noise from loading and unloading would be contained indoors. Typically, slow-moving, heavy-duty delivery trucks accessing loading docks can generate a noise level of approximately 79 dBA at a distance of 50 feet (Berger et al., 2010). These are noise levels generated by a truck that is operated by an experienced “reasonable” driver with typically applied accelerations. Higher noise levels may be generated by the excessive application of power. Lower levels may be achieved but would not be considered representative of a nominal truck operation.

The nearest sensitive receptors to the docking stations are the single-family residences to the south of the project site across Sepulveda Boulevard located approximately 250 feet to the south of the truck loading area. At this distance, the maximum sound level at the nearest sensitive receptor from delivery trucks would be approximately 65 dBA. This noise level would be masked

by the traffic noise along Sepulveda Boulevard (approximately 68 dBA; refer to **Table XIII-4**) and would be below the ambient noise level of 70.9 dBA L_{eq}, refer to **Table XIII-2**. Therefore, operational noise impacts resulting from truck deliveries would be less than significant.

Outdoor Employee Break Areas

Less Than Significant Impact. The project proposes an outdoor employee break area in the form of a patio space located to the south of the proposed building. The proposed outdoor patio areas have the potential to be accessed by groups of employees intermittently. Noise generated by groups of people is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the group members. This type of noise is estimated at 60 dBA at one meter (3.28 feet) away for raised normal speaking (Hayne et al., 2006). This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the group members. Therefore, group noise would be approximately 62 dBA at one meter (3.28 feet) from the source. As the nearest sensitive receptors are the single-family residences to the south of the project site across Sepulveda Boulevard located approximately 210 feet from the outdoor patio area, that noise would be reduced to approximately 26 dBA, which would be significantly below the ambient noise level of 70.9 dBA L_{eq}, refer to T **Table XIII-2**. As such, impacts would be less than significant in this regard.

Composite Stationary Noise

Less Than Significant Impact. The project would result in various onsite noise sources, such as noises generated by building mechanical equipment, parking areas, truck deliveries, and an outdoor employee break area, as individually evaluated above. These multiple noise sources would be spread throughout the Project Site and would generate noise infrequently and for short durations. While these noise sources may intermittently generate noise at the same time, they would not generate noise at the same time at the same location near the project site boundary. Given the intermittent nature of the onsite noise sources, their dispersed locations across the site, and the various noise attenuation features of the Project (e.g., indoor loading/unloading of trucks, property walls, the 60-foot setback from the eastern property line with a 12-foot landscape buffer), the composite noise from the Project's onsite sources would not result in a significant impact to off-site sensitive receptors.

Mitigation Measure: The following mitigation measure would be required during project construction.

MM XIII-1: Prior to issuance of any grading permit, the project applicant shall install a temporary, 10-foot-high acoustic barrier along the eastern boundary of the project site to reduce construction noise to 75 dBA L_{eq} at the project boundary.

b. Generation of excessive groundborne vibration or groundborne noise levels?

CONSTRUCTION

Less Than Significant Impact With Mitigation Incorporated. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inches per second [in/sec]) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The vibration produced by construction equipment is illustrated in **Table XIII-7**, *Typical Vibration Levels for Construction Equipment.*

TABLE XIII-7
TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate peak particle velocity at 10 feet (inches/second)[1]	Approximate peak particle velocity at 15 feet (inches/second)[1]	Approximate peak particle velocity at 25 feet (inches/second)[1]
Large bulldozer	0.352	0.192	0.089
Loaded trucks	0.300	0.164	0.076
Small bulldozer	0.012	0.007	0.003
Jackhammer	0.138	0.075	0.035

Notes:

Calculated using the following formula:

$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance

PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Groundborne vibration decreases rapidly with distance. As indicated in **Table XIII-7**, based on the FTA data, vibration velocities from typical heavy construction equipment operation that would be used during project construction range from 0.012 to 0.352 in/sec peak particle velocity (PPV) at 10 feet from the source of activity. The nearest off-site structures are a residential building and a commercial building located approximately 10 feet from the eastern and western boundaries of the project site, respectively. Therefore, construction vibration control measure would be necessary. Compliance with Mitigation Measure XIII-2 would ensure the project would not utilize heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, large bulldozers, jackhammers, pile drivers, etc.) within 15 feet of off-site uses or nearby structures. Furthermore, hauling trucks on-site would be directed away from eastern or western boundaries of the project site where the off-site sensitive uses and structures are located. Therefore, with the implementation of Mitigation Measure XIII-2, vibration from construction activities experienced at the nearest structure (residential and commercial buildings to the east and west of the project site) would be below the 0.20 in/sec PPV significance threshold. Thus, a less than significant impact with mitigation incorporated would occur in this regard.

OPERATIONS

Less Than Significant Impact. Operation of the project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. Heavy-duty trucks would travel to and from the project site on surrounding roadways, such as Sepulveda Boulevard, which is an existing, six-lane major roadway with existing truck traffic. According to the FTA, it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.[10] As such, the operations of the project would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur in this regard.

Mitigation Measure: The following mitigation measure would be required during project construction.

MM XIII-2: Heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, large bulldozers, jackhammers, pile drivers, etc.) shall not be used within 15 feet of the eastern and western boundaries of the project site and hauling trucks on-site shall be directed away from eastern and western boundaries of the project site.

c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a private airstrip. The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the Torrance Municipal Airport, located approximately 1.96 miles to the southwest of the project site at 3301 Airport Drive in the City of Torrance. According to the Los Angeles County Airport Land Use Commission, the project site is not located within an airport land use plan (2004). Therefore, project implementation would not introduce a safety hazard for people residing or working in the project area. No impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. A potentially significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. As discussed in the responses to the Land Use/Planning thresholds in Section XI, the proposed warehouse project is consistent with the Harbor Gateway Community Plan land use policies, which designate the project site and neighboring properties for industrial uses, including warehouses, and which promotes development of land uses that provide local job opportunities. No housing units would be developed as part of the proposed project, and no new or expanded urban infrastructure would be constructed that could foster increased development at surrounding properties. As such, the proposed project would have no impact with respect to inducing unplanned population growth, either directly or indirectly.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A potentially significant impact would occur if the proposed project would displace a substantial quantity of existing residences or a substantial number of people. There is no existing housing on the proposed project site and there is no active land use on the vacant site that had been developed for an industrial use and mini golf facility that are no longer operational. Construction of the proposed warehouse, therefore, would not displace any people or housing. Therefore, the project would not necessitate the construction of replacement housing elsewhere and no impact would occur.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a. Fire protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Fire Department (LAFD) could not adequately serve the proposed project, necessitating a new or physically altered station. Fire prevention and suppression services for the project site and vicinity are provided by Station 85, which is part of the South Bureau of the Los Angeles Fire Department (LAFD). The South Bureau of the LAFD has three battalions and covers the southern portion of Los Angeles. Station 85 is located approximately 1.3 miles south of the project site (1331 West 253rd Street) and has 36 responders (with 12 on duty at any one time), an Urban Search and Rescue team, 2 engines, a truck company hook and ladder, and a paramedic rescue ambulance (Kim 2020). Due to its proximity, the project site is within the acceptable response time from Station 85.

The proposed project would result in a new warehouse building, which could increase the number of emergency calls and demand for LAFD fire and emergency services. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that there are existing fire stations in close proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The proposed project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered

governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

The building and all site improvements must be designed to comply with all applicable fire safety codes enforced by the City of Los Angeles, which would be verified during the City's routine plan check and building permit procedures. The project would not include the transfer or storage of hazardous materials. There is no outdoor storage proposed, which results in a very low risk of an accidental or intentional fire that might occur with outdoor storage facilities. Aside from truck ingress/egress, employee traffic and parking on-site, and routine site and landscape maintenance, all activities would be conducted within the building interior. All loading/unloading would occur inside the building.

As a modern warehouse structure built to meet the city's current building safety codes and as a warehouse that would not include the storage or use of hazardous or highly flammable substances or materials, it is unlikely that the project would require more or different fire suppression services than previous uses. As such, the project would not result in a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency response. Therefore, the proposed project would result in a less than significant impact involving fire department resources.

b. Police protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed project, necessitating a new or physically altered station. The proposed project would result in a new warehouse building and could increase demand for police service. Police protection services for the project site are provided by the Harbor Community Police Station, operated by the City of Los Angeles Police Department, which is located at 2175 John S. Gibson Boulevard in San Pedro California, approximately 4.1 miles south southeast of the project site. The project site is within the acceptable response time for the Harbor Community Police Station. The project proposes security features that would limit demand for police services and will therefore reduce the need for police compared to the vacated site conditions that may attract illicit activity. The project would include on-site security personnel and/or security cameras. Electronically or manually controlled security gates are proposed at the southwestern entry drive and at the drive aisle on the east side of the building, to limit access to the site interior to employees and truck deliveries. Additionally, the proposed project would include outdoor lighting fixtures to provide minimum safe illumination levels for employees who are active after daylight hours. There would be no outside storage that would attract intruders. With these security measures, and with all warehouse activities to be conducted indoors, there is a limited potential for theft, vandalism, or other law enforcement problems associated with this project. Given that there is a police station in close proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for police protection. Project impacts would be less than significant.

c. Schools?

Less Than Significant Impact. A significant impact would occur if the proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The proposed project would result in a new warehouse building. Implementation of the proposed project would not include construction of new residential units, and therefore would not directly increase the number of students attending school campuses within the Los Angeles Unified School District (LAUSD). Employees who work at the new warehouse are expected to be from the local labor force, for the most part, and would likely not represent new residents within the LAUSD. Further, the project developer would be required to pay mandatory school impact fees, prior to issuance of building permits, to offset the minor and indirect effect on local school facilities. Development of the proposed project would be subject to California Government Code Section 65995, which would allow LAUSD to collect impact fees from developers of new residential and commercial space. Conformance to California Government Code Section 65995 is deemed to provide full and complete mitigation of impacts to school facilities. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

d. Parks?

No Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The proposed project would result in a new warehouse building. Implementation of the proposed project would not include construction of new residential units. Because of this, there would be no required open space elements to address outdoor recreation needs of residents. The project would have no effect on the City's parkland to residential population ratio and would not result in a need to acquire, build or expand any parks. The proposed warehouse project would result in little, if any, activity at neighborhood or regional parks, since the employees would generally remain at the site of the business throughout their work hours, except to travel to local food services or other errands. Further, the project includes an on-site outdoor employee break area with lunch/seating areas in the form of two permanent, weatherproof picnic tables covered by a trellis, as well as shade trees and a variety of groundcover and shrubs to create a green and relaxed environment which employees can use instead of traveling to off-site neighborhood parks. Therefore, the project would not result in an impact involving construction of new or expansion of existing parks to address a deficiency in the City's parkland resources.

e. Other public facilities?

No Impact. A significant impact would occur if the proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. The proposed project would result in a new warehouse building, which

would not result in a net increase of residential units; therefore, it would not result in increased demand for library services and resources of the Los Angeles Public Library System. The project would not directly or indirectly lead to an increase in residential population in the project area and would therefore not require the use or maintenance of other public facilities that are provided to benefit local residents, such as libraries, senior centers, etc. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts, and no impact to other public facilities would occur.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

No Impact. A significant impact would occur if the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The proposed project would result in a new warehouse building, which would not result in a net increase of residential units; therefore, it would not result in increased demand for park facilities. There is no existing neighborhood or regional parks or other public recreational facility at the project site that would be displaced or removed by the project, which was occupied by the Mulligan's Family Fun Center (a private, commercial use) for several decades. The proposed project does not include the development of housing or other residential uses that would result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. The proposed warehouse project would result in minimal activity at neighborhood or regional parks, since the employees would generally remain at the site of the business throughout their work hours, except to travel to local food services or other errands. Further, the project includes an approximately, 8,000 square foot on-site outdoor employee break area. This outdoor break area includes lunch/seating areas in the form of two permanent, weatherproof picnic tables (seating approximately 12 people) covered by a trellis, as well as shade trees and a variety of groundcover and shrubs to create a green and relaxed environment which employees can use in their leisure time. Therefore, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and no impact would occur.

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?

No Impact. A significant impact would occur if the proposed project includes recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The proposed project does not include recreational facilities, except for a private outdoor employee leisure area for short-term break periods, involving passive activities such as sitting and walking. As the project is not a residential use, it would not necessitate construction of any additional parks or other recreational facilities outside of the site. Therefore, no impact would occur.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following analysis summarizes and incorporates by reference the information provided in the Transportation Assessment prepared by Gibson Transportation Consulting, Inc. dated January 22, 2021. The Department of Transportation ("LADOT") reviewed the analysis and confirmed its findings in the LADOT Transportation Impact Assessment letter dated February 22, 2021. Both documents are available as Appendix I to this IS/MND.

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant Impact. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The project is the construction of a warehouse building that will generate approximately 1,095 daily trips and a Work VMT per employee of 11.5, according to the transportation analysis prepared by Gibson Transportation Consulting, Inc. (Appendix I). The Los Angeles Department of Transportation (LADOT) has reviewed the Vehicle Miles Traveled (VMT) calculations for the subject project and, in the Transportation Impact Assessment letter (Appendix I), determined that the projected Work VMT per employee of 11.5 is less than the threshold Work VMT per employee of 12.3 for the Harbor geography, and concluded that implementation of the project would not result in a significant Household or Work VMT impact.

Roadway Circulation System

The proposed project site fronts Sepulveda Boulevard in the Harbor Subarea of the City of Los Angeles. The Mobility Plan 2035 identifies this portion of Sepulveda Boulevard as a Boulevard II,

which coincides with the federal designation of a Major Highway Class II, with an ultimate right-of-way of 110 feet and roadway width of 80 feet (Mobility Plan 2035). Boulevards in the City are intended to provide regional access to major destinations (Complete Streets). The local segment of Sepulveda Boulevard is not identified for any physical changes or for any functional changes to implement the City's Complete Streets objectives, which are aimed at facilitating multi-modal travel and other public functions within street rights of way (Complete Streets). In this portion of the City of Los Angeles, Sepulveda Boulevard has three lanes in each direction with a center turn lane, and the physical geometry of the street along the project site frontage is the same to the west and east of the project site. While the right-of-way at this portion of Sepulveda Boulevard has not been built to its full extent, it is currently at approximately 100 feet, and the surrounding area is completely developed. The project is required by the Bureau of Engineering (BOE) to dedicate 3-5 feet along the street frontage, to meet the City's standard half right-of-way width of 55 feet. Sepulveda Boulevard, from west of Hawthorne Boulevard in the western Torrance area, to east of Alameda Street near the Los Angeles Ports, is identified as part of Metro's Countywide Strategic Truck Arterial Network (Metro). As such, the project's trucks would arrive and depart along this existing truck route. It is estimated that 85 percent of all truck trips would travel to/from the I-110 Freeway east of the project site (Appendix I).

During construction, the nearest travel lane to the project site could be temporarily closed for a period of up to 20 days, while the frontage is reconstructed and utility connections are being made. As with any new development project that would require a temporary lane closure during construction, this project will be required to maintain through traffic and emergency access at all times, while the lane is closed. As such, this temporary impact would not have a significant effect on the function of Sepulveda Boulevard. No permanent alterations to the physical configuration of Sepulveda Boulevard would occur as a result of this project, and the Project would not affect the functionality of this major boulevard as it is intended in the Mobility Element of the General Plan.

The proposed project would not conflict with any plans, programs, ordinances, or policies related to roadways and the impacts would be less than significant.

Transit Facilities

The adjacent segment of Sepulveda Boulevard is not within the City's Transit Enhanced Network (Mobility Plan 2035), which is comprised of streets that prioritize travel for transit riders (Complete Streets). Along both the westbound and eastbound portions of Sepulveda Boulevard adjacent to the project site, the Torrance Transit Line 7 has bus stops at Normandie Avenue, Halldale Avenue, Lockness Avenue, and Western Avenue. The westbound stop opposite Halldale Avenue is along the project site frontage, identified by a sign (no transit facility or structure is located here). During construction this stop could be temporarily closed or relocated for a period of up to 20 days while the frontage is reconstructed and utility connections are being made. This temporary impact would not have a significant effect on the scheduling or operations of Line 7, as there are other nearby stops that would be available, if needed. Once these frontage improvements are completed, the bus stop would be restored to its current location and function. As such, the project would not

conflict with any plans, programs, ordinance, or policies related to transit and the impacts would be less than significant.

Bike Facilities

The portion of Sepulveda Boulevard adjacent to the project is not part of the City's Bicycle Lane Network. (Mobility Plan 2035). Further, the adjacent segment of Sepulveda Boulevard is not within the City's Bicycle Enhanced Network, which is comprised of streets that prioritize bicycle travel by providing specific bicycle facilities and improvements (Complete Streets). This project would not permanently affect the street right-of-way or the ability to add a bike lane in the future, if the City should determine that is desirable. Therefore, the project would not conflict with any plans, programs, ordinances or policies related to bicycle travel and there would be no impact in this regard.

Pedestrian Facilities

The adjacent segment of Sepulveda Boulevard is not within the City's Pedestrian Enhanced Network, which includes streets where pedestrian improvements are prioritized to provide safe and enjoyable walking connections to and from major destinations within communities (Complete Streets). There is an existing sidewalk with varying widths ranging from 6.5 to 8 feet on the northern edge of Sepulveda Boulevard, adjacent to the project site. While this section of Sepulveda Boulevard does not appear to carry a significant amount of pedestrian traffic, provisions to maintain safe pedestrian movement past the active construction zone would be implemented as part of the routine construction traffic controls required by the City for this or any other project that involves temporary construction disruptions along a street frontage. The project would not conflict with any plans, programs, ordinances or policies related to pedestrian travel and the impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant Impact. The referenced section of the CEQA Guidelines was added when the California Legislature passed Senate Bill 743, to change the primary metric to assess traffic impacts from vehicle delay and congestion, measured in terms of levels of service at intersections and freeway ramps, to vehicle miles traveled (VMT) for various types of trips. This change was enacted to help implement the State's objectives to reduce the level of greenhouse gas emissions generated by exhausts from vehicular travel. Transportation sources represent approximately 40 percent of all GHG's emitted in California (CARB 2019). It was recognized that a focus on reducing congestion mainly leads to expansion of the roadway system capacity through physical expansions, thus facilitating higher traffic volumes and smoother traffic flows, which discourage alternative forms of travel and contribute to high rates of GHG emissions from vehicular travel. The shift to a focus on reducing vehicle miles traveled recognizes that to the extent vehicle trips are avoided or shortened, the level of GHG emissions associated with vehicle travel will also decline.

Recently, the City of Los Angeles, Department of Transportation updated their Traffic Analysis Guidelines (TAG) to establish analysis methods and impact significance criteria to apply in the

analysis of vehicle miles traveled effects associated with new land use projects. Specifically, Threshold T-2.1 inquires whether the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1).

VMT Impact Criteria

Per Section 2.2.3 Impact Criteria of the TAG, a development project would have a potential impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. (See Table 2.2-1)
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located. (See Table 2.2-1)
- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above. (See Table 2.2-1)

As the proposed warehouse project is not a residential, office, or a regional serving project such as retail, entertainment or event center, consistent with the Impact Criteria above, the project's impact would be considered significant if it would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located. The project site is located within the Harbor APC, where a threshold of 12.3 VMT per employee has been established as the threshold of a significant impact (i.e. 12.3 VMT is 15 percent below the existing average work VMT per employee for the Harbor APC).

VMT Methodology

The project's vehicle trips and VMT have been calculated using the City of Los Angeles VMT Calculator Version 1.3 (May July 2020) (VMT Calculator), as detailed in City of Los Angeles VMT Calculator Documentation (LADOT and LADCP, May 2020). LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

- Home-Based Work Production: trips to a workplace destination originating from a residential use;
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use;
- Home-Based Work Attraction: trips to a workplace destination originating from a residential use.

As detailed in *City of Los Angeles VMT Calculator Documentation*, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts in CEQA*

(Governor's Office of Planning and Research, December 2018). As noted in the TAG, small-scale commercial components less than 50,000 sf of larger mixed-use development projects are not considered for the purposes of identifying significant work VMT impacts, as those trips are assumed to be local serving and would have a negligible effect on VMT.

Other types of trips generated in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination originating from a non-residential use). These trip types are not factored into the household VMT per capita and work VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total project VMT for screening purposes when determining if VMT analysis would be required.

Travel Behavior Zone (TBZ)

The City developed TBZ categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in *City of Los Angeles VMT Calculator Documentation*, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network

The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project address. The Project is located in Suburban Center (Zone 2).

Trip Lengths

The VMT Calculator determines a project's VMT based on trip length information from the City's Travel Demand Forecasting Model, which considers the traffic analysis zone where a project is located to determine the trip length and trip type, which factor into the calculation of a project's VMT.

TDM Measures

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. No VMT reductions have been applied or assumed as part of the Project's VMT calculation.

Project VMT Analysis

The project site is zoned for industrial and manufacturing uses, including warehouses, and the building tenant could be either a standard warehouse or last-mile delivery warehouse use, consistent with the site's industrial zoning designation.

The VMT Calculator identifies three potential types of industrial uses for analysis: light-industrial, manufacturing, warehouse/self-storage. Of these, light-industrial generates daily trips/employees at a higher rate than warehouse/self-storage which generates at the lowest rate among the presented industrial uses. To provide a conservative analysis (i.e. analyze the most impactful potential use), the project's VMT analysis utilizes the light-industrial use for the potential operation.

The VMT analysis results using the City's VMT Calculator are summarized in **Table XVII-1**, below. Detailed output from the VMT Calculator is provided in Appendix I of this Initial Study/MND.

TABLE XVII-1 VMT ANALYSIS SUMMARY

Project Information	
Land Use	**Size**
Industrial/Light Industrial	174,211 sq ft.
Project Analysis[1]	
Project Area Planning Commission	Harbor
Travel Behavior Zone[2]	Suburban (Zone 1)
VMT Analysis	
Daily Vehicle Trips[3]	1,088
Daily VMT	7,401
Daily Work VMT	1,999
Work VMT per Employee[4]	11.5
Impact Threshold	12.3
Significant Impact	**NO**

Source: Gibson Transportation Consulting, Inc. January 2021 (Appendix I)

Notes:

1. Project Analysis based on the City of Los Angeles VMT Calculator Version 1.3 (v141, July 2020).
2. A "Suburban (Zone 1)" TBZ is characterized in *City of Los Angeles VMT Calculator Documentation*(LADOT and DCP, 2020) as very low-density developments primarily centered around single-family homes and minimally connected street network.
3. Total daily project trips, including passenger vehicles and trucks, as estimated by the VMT Calculator. For screening purposes only, the VMT Calculator estimated 704 net daily project trips when including credit for existing uses.
4. Number of employees generated by *City of Los Angeles VMT Calculator Version 1.3* (v141, July 2020); based on home-based work attraction trips only.

Project VMT

The VMT Calculator estimates that the project described above would generate 1,999 daily work VMT and 174 employees. Thus, the project would generate an average work VMT per employee of 11.5. The average work VMT per employee would not exceed the Harbor APC work VMT impact threshold of 12.3 per employee; therefore, the project would not result in a significant VMT impact and no mitigation measures would be required.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The proposed site plan was reviewed by Gibson Transportation Consultants, Inc. to determine if the project would substantially increase hazards due to geometric design features, with consideration of the following factors: (1) the relative amount of pedestrian activity at project access points; (2) design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists; (3) the type of bicycle facilities the project driveway(s) crosses and the relative level of utilization; (4) the physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts; (5) the project location, or project-related changes to the public right-of-way (ROW), relative to proximity to the High Injury Network or a Safe Routes to School program area; (6) and any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard. Gibson's analysis is summarized below (Gibson 2020).

Driveway Design Features

Vehicular access to the project site would be provided via two full access driveways along Sepulveda Boulevard. The eastern entrance would serve employee and emergency vehicles while the western entrance would serve trucks. Pedestrian and bicycle access to the project would also be provided along Sepulveda Boulevard.

The Mobility Plan designates Sepulveda Boulevard as Boulevard II, which requires a standard half-ROW width of 55 feet. Currently, Sepulveda Boulevard has a half-ROW width of 50 to 52 feet adjacent to the project site, which does not meet the Mobility Plan standards. The project is required by the Bureau of Engineering (BOE) to provide a varying dedication of three to five feet to meet the standard half-ROW width of 55 feet.

The section of Sepulveda Boulevard, along which the project's driveways are located, currently provides six travel lanes, three in each direction, divided by a two-way left-turn median allowing vehicle turn movements into the project and other adjacent developments. The existing site provides two full access driveways onto Sepulveda Boulevard; thus, the project would not be creating new traffic conflicts with pedestrians, bicyclists, or motorists. No existing or planned bicycle facilities are provided along Sepulveda Boulevard in the Mobility Plan. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for project traffic utilizing the proposed driveways.

On-street parking is prohibited adjacent to the project site. No unusual or new obstacles are present in the project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. Further, the project would redesign both existing driveways to meet LADOT design standards and revise the eastern driveway for improved alignment with the existing stop-controlled intersection at Halldale Avenue and Sepulveda Boulevard, functioning as the fourth leg of the intersection. Thus, the project would minimize conflict points to the greatest extent possible while also providing standard driveway widths for truck and vehicle access.

Pedestrian and Bicycle Activity

Two driveways currently exist at the project site in the general locations proposed by the project. The eastern driveway is proposed to be shifted slightly to the east to align as a fourth leg to the intersection of Halldale Avenue & Sepulveda Boulevard, thus providing safer access for bicyclist and pedestrians to access the project site. The western driveway would serve as the primary truck driveway and would be designed to maximize sight distance for drivers to see other roadway and sidewalk users. No new (additional) curb cuts would be created. Sepulveda Boulevard, a designated Boulevard II in the Mobility Plan, is not identified as part of the Pedestrian Enhanced Districts, Bicycle Lane Network, or Bicycle Enhanced Network.

Review of traffic count data from May 2019 shows that pedestrian and bicycle activity traversing the driveways along Sepulveda Boulevard are fewer than 15 per hour (less than one per minute). Based on the trip generation estimates detailed in the project's Transportation Assessment, the project would generate fewer than one vehicle per minute at either of the Project driveways, providing adequate gaps in traffic for pedestrians and bicyclists to safely cross (Gibson 2020). Thus, there would be minimal conflicts between vehicles and pedestrians/bicyclists at the driveways.

Lines of Sight

The project driveways would be designed to remain clear of hardscapes, vegetation, or signage that would impede sight lines. Sidewalk treatments across the driveways would be incorporated for increased safety and visibility.

The project site is located on a flat parcel with little to no change in vertical elevation. Therefore, no line of sight issues would be caused by changes in elevation and drivers would be able to safely identify approaching vehicles, pedestrians, and bicycles at the Project driveways. Driveways are designed to intersect the public ROW at as close to a right angle as possible with adequate building setback to allow pedestrians and bicyclists to observe vehicles within the driveways.

Project Location

The project site is not located adjacent to a street identified as part of the High Injury Network. Additionally, the Safe Routes to School map does not identify any infrastructure improvement projects within the Study Area.

Incompatible Uses

The proposed warehouse traffic would be compatible with the existing traffic patterns generated by surrounding industrial, commercial and residential land uses. The project would not change the character of the industrial corridor and no elements of the project's uses or design would be considered incompatible.

Conclusion

Based on the site plan review, the project would not create any geometric design features that would substantially increase hazards as it relates to traffic movement, mobility, or pedestrian accessibility and impacts would be less than significant.

d. Result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if the project design threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. There are no designated critical facilities or lifeline systems on or near the project site, as shown on the City's "Critical Facilities & Lifeline Systems map, in Exhibit H of the Safety Element of the General Plan. Sepulveda Boulevard is identified as a "Selected Disaster Route." These routes are defined as "primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes." The proposed project would not alter the physical structure of Sepulveda Boulevard and would not significantly affect the street's ability to support the functions of a selected disaster route. The Project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way.

During construction, the nearest travel lane could be temporarily closed for a period of up to 20 days, while the frontage is reconstructed and utility connections are being made. Through routine construction traffic control measures that would be imposed on the construction contractor through the City's building permit process, as would be the case for any new development project that would require a temporary travel lane closure, through traffic and accessibility by emergency response vehicles and crews would be maintained at all times. This would avoid a significant impact to emergency access and response functions along Sepulveda Boulevard for that short period of time when the near travel lane is closed. Further, the operation of the project would have no impact to emergency access. The project site would have two driveways and vehicular circulation within the site, that would be constructed in accordance with city design standards which would ensure sufficient emergency access by emergency vehicles and crews. The proposed project would not affect any surrounding properties' emergency access. The proposed project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, the proposed project would have a less than significant impact on emergency access.

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XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Information and analysis in the following responses are based on research consisting of: a California Historical Records Information System ("CHRIS") records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on September 14, 2020, a Sacred Lands File Search completed on October 15, 2020, a literature review, historical society consultation, historical map review, a desktop built environment survey, and an analysis of historic context conducted by a cultural resource specialist with Michael Baker International. The research is documented in Appendix D of this IS/MND.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal

Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site.

City Planning staff sent notifications to ten (10) California Native American Tribes on October 2, 2020 who have indicated they have a traditional and cultural affiliation with the project area, that the proposed Project is under review by the City and to provide those tribes with an opportunity to request a formal consultation to discuss potential impacts to tribal cultural resources of concern to those tribes. The Gabrieleno Band of Mission Indians – Kizh Nation responded with a request for consultation, which occurred on December 10, 2020. During that consultation, the tribe provided maps, literature excerpts, and other information to the City indicating Native American settlements within the Los Angeles region. The tribe also requested information on the source/history of the project site's soils, which was subsequently provided to the tribe on December 21, 2020 and February 24, 2021. Please refer to the following response to threshold b, for a discussion of potential impacts to resources of concern identified by the Gabrieleno Band of Mission Indians – Kizh Nation.

In addition, research was conducted through the California Historic Resources Information System (see Appendix C documentation), to determine whether there are any recorded historical resources at the project site that include some form of tribal cultural resources and if any such resources were deemed to be eligible or potentially eligible for listing in the California Historical Register or in a local register of historic resources. No such resources have been recorded. Further, as stated in Section V, Cultural Resources, of this Initial Study, the records search, literature review, historical society consultation, historical map review, and survey conducted for the Project revealed no historic or prehistoric resources on the Project Site or within a quarter mile of the Project Site. Therefore, the Project would not affect tribal cultural resources that are or could be listed in the California Historical Register or a local register of historic resources.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes

that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. As noted in the preceding response, the City consulted with the Gabrieleno Band of Mission Indians – Kizh Nation on December 10, 2020 to discuss their concerns as to potential Project impacts that could negatively impact tribal cultural resources. After a thorough review of the information submitted by the tribe, the Department of City Planning concluded that the information provided by the tribe does not provide any specific information or evidence regarding the presence of tribal cultural resources within the Project Site. At the conclusion of the consultation, the Department of City Planning issued a letter dated March 17, 2021, concluding that mutual agreement cannot be reached for purposes of AB 52, and that no substantial evidence exists to support a conclusion that this project may cause a significant impact on tribal cultural resources. However, in the unlikely event that tribal cultural resources are inadvertently discovered during the excavation and grading of the Project Site, the project will be subject to standard regulatory requirements for the inadvertent discovery of tribal cultural resources:

> Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
>
> - Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-0016.
> - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
> - The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
>
> - The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been

reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Therefore, with compliance with regulatory compliance measures, impacts will be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. A significant impact would occur if the proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. The proposed project involves the construction of a new warehouse facility, and would be consistent with Citywide growth, and, therefore, the project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan (UWMP).

Water

The proposed project would obtain water from the Los Angeles Department of Water and Power (LADWP) through an existing water meter along Sepulveda Boulevard that connects to an existing water main in Sepulveda Boulevard. An existing 12-inch LADWP water line that runs through the project site would be rerouted to go around the proposed warehouse building. The temporary and short-term impacts associated with the construction and relocation of these lines would not add significant or unique impacts beyond the range of construction impacts addressed throughout this Initial Study. Therefore, impacts due to the project's effects on water facilities would be less than significant.

Wastewater

Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project. The project would construct approximately 150 LF of 8-inch private sewer on the project site to connect to an existing sewer lateral that connects to a 12-inch City of Los Angeles sewer main located along the adjacent segment of Sepulveda Boulevard. The project would also install an on-site sewer cleanout. As the project would connect to an existing sewer lateral, the construction impacts would be minor in scale and temporary, and would occur during the construction of various utility connections along the site frontage. Construction of the sewer improvements would not result in significant or unique impacts beyond the range of construction impacts assessed throughout this Initial Study and would not result in significant impacts.

Storm water

The project site currently drains via sheet flow onto the Sepulveda Boulevard public right-of-way where it is routed into the Los Angeles County Flood Control District (LACFCD) Storm Drain Line BI 0661 via the existing curb and gutter. The proposed project would remove any existing storm drainage facilities within the project site and replace it with a new storm drain system that would convey some of the runoff into infiltration wells for infiltration purposes. Excess runoff (restricted to the existing condition runoff leaving the site) would be conveyed to MS4 within the public right of way. This would ensure that the existing, public storm drain system is not significantly impacted by the proposed project.

The proposed project would not alter the existing municipal storm drainage system. Construction of the project storm drainage improvements would not result in any significant or unique temporary impacts beyond the construction impacts that are evaluated throughout this Initial Study. Impacts would be less than significant.

Electricity

The proposed project will connect to the nearest existing LADWP electricity infrastructure, which is across the street from the proposed project. A temporary interruption to traffic flow along the

near travel lane could possibly occur; however, that would not result in a significant impact, as discussed below. Therefore, temporary impacts due to the project's effects on electrical facilities would be less than significant.

Since the proposed warehouse is consistent with the City's General Plan land use policies and zoning standards, and is in an urbanized area already fully served by the City's electrical power infrastructure, this project would not require additional capacity in the City's electrical supply or transmission infrastructure

Natural Gas

The proposed project does not include connection to any natural gas infrastructure. Any existing lines into the project site would be capped. Therefore, the project would have no impact due to relocation or construction of natural gas facilities.

Telecommunications

The proposed project would connect to the nearest existing infrastructure for telecommunications, located along Sepulveda Boulevard. No additional infrastructure would need to be constructed or relocated to provide telecommunications services. Temporary disruption to the near travel lane could possibly occur while the connection is under construction, as discussed below. Therefore, impacts due to the project's effects on telecommunications facilities would be less than significant.

Temporary Effect on Traffic Flow and Emergency Vehicle Access During Construction of Utility Connections

During construction of frontage improvements and utility connections, it is possible that the closest travel lane to the project site along Sepulveda Boulevard may be closed for up to 20 days. This temporary impact is common for new development projects and, pursuant to existing standard practices and City permitting requirements, the contractor would be required to maintain through traffic and emergency access at all times while the near travel lane is closed. As such, the short-term traffic flow impact would be less than significant.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. The Urban Water Management Planning Act[11] requires urban water suppliers in the state that provide water to 3,000 or more customers, or that provide over 3,000 acre feet (af) of water annually, must submit an Urban Water Management Plan (UWMP) to assess the reliability of water sources over at least a 20-year planning time frame and describe demand management measures and water shortage contingency plans. LADWP adopted its most recent UWMP in June 2016, which is titled the 2015 UWMP (LADWP 2015). In this UWMP, LADWP affirmed that there is a sufficient and reliable water supply to meet the forecast demands for the entire service area, through year 2040. The UWMP forecast relies upon population and employment projections provided for the LADWP service area by the Metropolitan Water District,

[11] California Water Code Sections 10610-10656.

who utilized data Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan. The employment associated with the proposed project would be consistent with the growth forecasts developed for that regional plan; therefore, the Project water demand is accounted for in the UWMP.

Additionally, the proposed project would also comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180822 and in the Los Angeles Green Building Code to minimize water usage. These standards require the use of water conserving plumbing fixtures within the warehouse building as well as water conserving landscape design, installation, and maintenance.

The proposed warehouse is for operations that are limited to storage, assembly, packaging, and shipping activities, with minor incidental office spaces. The project would not include any industrial processing equipment that would require water supplies to operate. Water use for the project is anticipated to be limited to restroom sinks and lavatories and possibly small kitchen areas, along with outdoor irrigation of landscaping. Given this limited water use and an estimated daily wastewater generation of 4,355 gallons per day (gpd),[12] it is estimated that the warehouse would consume that amount of water on a daily basis, with some additional water use for the outdoor irrigation system. However, the amount of water used for outdoor landscaping irrigation would not be substantial given project compliance with required water conservation landscape design, installation, and maintenance measures included within the Los Angeles Green Building Code.

It is noted that the project site was actively in use as a commercial recreation center for several decades, prior to its closure in February 2020. During its operation, the prior amusement park was frequented by customers on a regular basis, with increase in intensity of usage during the weekends, and thus water was regularly consumed by interior plumbing devices and the outdoor irrigation system. The proposed warehouse project that would replace this commercial usage is not anticipated to generate a significant difference in daily or annual water demand, compared to the prior amusement park.

Given that the project is consistent with the Harbor Gateway Community Plan land use designation and the City zoning code, the project water demands were accounted for in the projections used to calculate demand scenarios for the 2015 UWMP. The project would not require acquisition of additional water supply entitlements or construction of new water supply or transmission infrastructure. Project impacts on water supply resources would be less than significant.

[12] Using the Los Angeles County Sanitation Districts' Table 1: Loadings for Each Class of Land Use provides a factor of 25 gallons per day (gpd) per 1,000 square feet of warehouse space. Using the square footage of 174,211 square feet for the project results in a total estimated wastewater generation of 4,355 gpd. This Loadings Table is available at https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. Wastewater discharged to the City's sewer main would flow into the 12-inch sewer main that is a part of the Harbor Gateway wastewater conveyance network maintained by the Los Angeles County Sanitation District 5 (LASAN 2019)(LACSD a).The wastewater would then flow to the Joint Water Pollution Control Plant in the City of Carson. The Joint Water Pollution Control Plant receives approximately 260 million gallons of wastewater per day (mgd), and has a total capacity of 400 mgd (LACSD b). The Los Angeles County Sanitation Districts' Loadings Table estimates that warehouses produce 25 gallons per day (gpd) for every 1,000 square feet of space (LACSD c). As the project comprises approximately 174,211 square feet, it is estimated that the project would produce 4,355 gpd of wastewater. This increase in wastewater represents 0.003 percent of the remaining capacity at the Joint Water Pollution Control Plant and, as such, the project would not require any additional wastewater treatment capacity than presently exists.

The proposed project site has been actively in use as a commercial recreation center, which closed in February 2020. During its operation, the prior amusement park was frequented by customers on a regular basis, with increase in intensity of usage during the weekend, which generated wastewater flows on a daily basis by customers and employees. The proposed warehouse project that would replace this commercial usage is not anticipated to generate a significantly higher rate of wastewater than the prior amusement park. Therefore, impacts would be less than significant.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Please note that the response to this threshold is included in the discussion following threshold e, to provide a comprehensive analysis of both thresholds, in a single narrative.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. There are no federal solid waste regulations that pertain to the proposed project. Assembly Bill (AB) 939, the California Integrated Waste Management Act of 1989, required every city and county in California to reduce the amount of waste disposed at landfills by 25 percent by 1995, and 50 percent by 2000. AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local jurisdictions to adopt ordinances requiring commercial buildings to provide an adequate storage area for the collection and removal of recyclable materials. AB 341 of 2012 requires businesses to arrange for recycling services. Additionally, the City has adopted the Los Angeles Green Code, which establishes requirements for construction waste reduction, disposal, and recycling. This includes Section 5.410.1 which requires that a readily accessible area is provided to serve the entire building for the depositing, storage, and collection of non-hazardous materials for recycling that will include, at a minimum, paper, corrugated cardboard, glass, plastics, organic waste, and metals.

The City adopted a *Solid Waste Integrated Resources Plan* (SWIRP), in 2013 (LASAN 2013). The overall goal is to reduce, reuse, recycle, or convert (into energy or fuel) the wastes currently transported to landfills for disposal, so as to achieve an overall diversion rate of 90 percent or more by the year 2025. To reduce landfill disposal of construction wastes, the City adopted a Construction and Demolition (C&D) Waste Recycling Ordinance, L.A.M.C. Section 66.32, which requires all solid waste haulers, contractors, and recyclers to obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste (LASAN Construction & Demolition Recycling). Part of this permit process mandates the recycling of construction and demolition waste. This recycling of C&D waste is accomplished through L.A.M.C. Section 99.05.408.1, which requires newly constructed nonresidential buildings to comply with Section 66.32. Complying with the Citywide C&D Waste Recycling Ordinance would ensure that all C&D solid waste would be routed to a City Certified Processor. These processors have been certified by the City to ensure that they have the ability to divert at least 70 percent of the received waste from landfills through reusing, recycling, or converting waste for other purposes.

Operational solid waste removal would be handled through the City's exclusive, competitive franchise system, established in L.A.M.C. Sec. 66.33 *et seq*. Athens is the recycLA franchised Service Provider for the project site (LASAN recycLA). This service provider would conduct a Waste Assessment to determine the specific project needs and to ensure compliance with state and local regulations. L.A.M.C Section 66.33 also incorporates the permit requirements established in L.A.M.C. Section 66.32. This requires Athens to dispose of commercial waste only at a City Certified Processor. These processors have been certified by the City to ensure that each has the ability to divert at least 70 percent of the received waste from landfills through reusing, recycling, or converting waste for other purposes.

At this time, the City does not own or operate any landfills. They do operate over 500 refuse collection vehicles, which deliver refuse, recyclables, and organic waste to various points for processing and distribution, including 17 transfer stations, where waste is separated into material that is to be recycled or re-used, with the remainder to be sent to approximately 15 private and public landfills (LASAN 2013).

Based on the default settings of the CalEEMod program used to calculate the project's emissions of air pollutants during the construction phases, it was determined that the project's demolition phase would generate approximately 5,894 tons of solid waste (Appendix A). . Additional solid waste would be generated during construction of the warehouse and other new site improvements. Construction wastes would include concrete, asphalt, wood, metals, plastics, glass, and organics (landscape) materials. Based on the CalEEMod program settings to generate calculations of air pollutant emissions during project operation, the completed and fully operational project would generate approximately 340 tons per year of typical municipal solid wastes associated with warehouse and distribution operations. This would include packaging wastes such as paper, plastics and cardboard, along with metals, glass, and electronic wastes that are typically generated by any commercial operation. The municipal solid waste stream from the proposed project would not be substantially different than the existing waste stream for the previous amusement park.

Compliance with state and local statutes and regulations, including those required to meet the City of Los Angeles' Zero Waste goal, would ensure that the project does not exceed local infrastructure capacity for solid waste disposal or impair the attainment of the City's solid waste reduction goals. Impacts would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The project is not located in or near State or Local responsibility areas or lands classified as very high fire hazard zones (CalFIRE). The project is not located within a wildland fire hazard area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit D and Environmental and Public Facilities Map (1996). As such, the Project would have no effect on any provisions of an emergency response plan or emergency evacuation plan related to wildfire hazards.

The project site is located within a fully urbanized area of the City of Los Angeles where there are no wildlands or high-fire-hazard terrain (General Plan Safety Element). There are no designated critical facilities or lifeline systems on or near the project site, as shown on the City's "Critical Facilities & Lifeline Systems" map, in Exhibit H of the Safety Element of the General Plan. Sepulveda Boulevard is identified as a "selected disaster route." These routes are defined as "primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes." The Proposed Project would not alter the physical structure of Sepulveda Boulevard and would not affect the street's ability to

support the functions of a selected disaster route, whether related or not related to a wildfire event. The Project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way.

The City's emergency preparedness plans and procedures are focused on optimizing and coordinating communications, decisions, allocations of resources and responses to various emergency circumstances by various City and County public agencies. The Proposed Project would have no effect on those processes. Additionally, as the project site is not located in a very high fire hazard zone, it would not involve impacts to an emergency response plan related to wildfire.

As such, the project would not impair an adopted emergency response plan or emergency evacuation plan related to wildfires and no impacts would occur.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As mentioned previously, the proposed project is not located in or near State or Local responsibility areas or lands classified as very high fire hazard zones (CalFIRE). The project is not located within a wildland fire hazard area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit D and Environmental and Public Facilities Map (1996). The project site is located within a fully urbanized area of the City of Los Angeles where there are no wildlands or high-fire-hazard terrain (General Plan Safety Element). As such, the project would not exacerbate wildfire risks and no impacts would occur.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As mentioned previously, the proposed project is not located in or near State or Local responsibility areas or lands classified as very high fire hazard zones (CalFIRE). The project is not located within a wildland fire hazard area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit D and Environmental and Public Facilities Map (1996). The project site is located within a fully urbanized area of the City of Los Angeles where there are no wildlands or high-fire-hazard terrain. Further, the project site is not identified by the City of Los Angeles General Plan Safety Element as being located within an area susceptible to fire hazards. Finally, the project would not involve the installation or relocation of gas lines and if any are located within the project site, they will be removed. As such, the project would not require construction of any special infrastructure to prevent or facilitate responses to wildfire conditions and would not exacerbate fire risk due to such improvements that could result in temporary or ongoing impacts to the environment. No impacts would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As mentioned previously, the proposed project is not located in or near State or Local responsibility areas or lands classified as very high fire hazard zones (CalFIRE). The project is not located within a wildland fire hazard area, according to the City of Los Angeles Safety Element's Critical Facilities and Lifeline Systems Exhibit D and Environmental and Public Facilities Map (1996). The project site is located within a fully urbanized area of the City of Los Angeles where there are no wildlands or high-fire-hazard terrain. As discussed in Section VII. Geology and Section X. Hydrology and Water Quality, respectively, the relatively flat project site and surroundings are not susceptible to potential flooding or landslide hazards, nor would the project result in significant changes to site runoff, which would be fully controlled by a new, engineered storm drain system. As such, the project would not expose people or structures to significant risks associated with wildfires, including related conditions involving runoff, post-fire slope instability, or drainage changes and no impacts would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
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 past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant. As discussed in the responses to IV. Biological Resources, the long-developed Project site does not support any native plants or wildlife habitat or any kind of aquatic or riparian resources. Project construction activities involving removal of the existing trees and other landscaping could potentially disturb or destroy active migratory bird nests, including eggs and young. Disturbance or destruction of migratory bird eggs, young, or adults is in violation of the MBTA and is considered a significant impact. Such impacts would be avoided through avoidance measures that are required to comply with the provisions of the MBTAs, which is enforced by the City through a condition of project approval and in the construction specifications that are identified in the project's building permits. As such, the Project would not result in a significant impact to biological resources.

As discussed in the responses to V. Cultural Resources, there are no known historical or archaeological resources within the project site. Pursuant to the City's standard requirements, if archaeological resources are discovered during excavation, grading, or construction activities,

work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

As discussed in the response to VII.F, there are no known paleontological resources within the project site. Pursuant to the City's standard requirements, if paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, the impact would be less than significant.

With these standard compliance measures, the Project would not result in significant impacts to important prehistoric or historic resources.

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 past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the proposed project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. A review of City Department of Transportation and City Planning Department records of pending development applications determined that there are no other proposed projects within ½ mile of the project site or within ¼ mile of any of the traffic study area intersections.[13] As such, the project's range of construction and operational environmental impacts would not interact and combine with other local development projects.

Project impacts associated with alterations to the site itself would be largely limited to the site and immediate surroundings, including impacts involving aesthetics, biological and cultural resources, geologic and soils materials, utilities connections, hazardous materials, land use, noise, and tribal cultural resources. These localized impacts would not have cumulatively considerable effects.

Other impacts involving emissions of criteria pollutants, energy consumption, greenhouse gas emissions, traffic noise, water consumption, wastewater generation, and demand for public services would occur in a larger context, ranging from the City of Los Angeles, with respect to the

[13] Gibson Transportation Consulting, Inc. Transportation Assessment, Bridge Point South Bay VII, November 2020.

utility services it provides and the project's contribution to roadway traffic noise, to the region, with respect to energy consumption and criteria air pollutants, to a global context, with respect to greenhouse gas emissions. Based on the analyses presented in the preceding sections of this MND, none of these impacts would be significant at the project level and since the project is consistent with various plans and programs aimed at reducing the broader context of such impacts, the project's effects would not be cumulatively considerable. It is further noted that the analysis of the project's air quality impacts, relative to the SCAQMD's regional emissions thresholds, represents a simultaneous consideration of both project level and cumulative impacts, as these thresholds were designed by SCAQMD for both purposes. As discussed in the responses to III. Air Quality, the Project's emissions of criteria pollutants would be below all SCAQMD regional thresholds, for construction and operational conditions. The Project's air pollutant emissions, therefore, would not be cumulatively considerable.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant With Mitigation Incorporated. As discussed in the responses to III. Air Quality, with implementation of mitigation measures MM III-1 and MM III-2, which would reduce project construction PM_{10} and $PM_{2.5}$ and diesel equipment emissions, the project would not exceed LST thresholds, and would result in no significant impacts involving generation of criteria air pollutants or toxic air contaminants. As discussed in the responses to IX. Hazards, with a combination of mitigation measures MM IX-1 through MM IX-4, to address potential impacts related to prior ground contamination, methane gas, and oil well reabandonment, the project would not result in substantial adverse effects on human beings. As discussed in the responses to XIII. Noise, construction activities could result in short-term and occasional noise levels that could adversely affect the nearest residents to the east; however, this impact would be mitigated through a construction sound wall along the eastern property line, implemented by Mitigation Measure XIII-1 and XIII-2 to ensure that noise levels remain in accordance with the City's Municipal Code limits.

INITIAL STUDY

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INITIAL STUDY

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