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

MITIGATED NEGATIVE DECLARATION

15827 Roxford Street – Updated October 2022

Case Number: ENV-2021-8928-MND

Project Location: 15827 Roxford Street

Community Plan Area: Sylmar

Council District: 7 – Monica Rodriguez

Project Description: The project involves the demolition of an existing 182,230 square foot of warehouse building and construction, use, and maintenance of two new warehouse buildings with a total of approximately 612,227 square feet including 15,742 square feet of ancillary office space and 17,080 square feet of mezzanine. The proposed project will provide surface parking including 341 vehicle parking spaces, 95 dock doors, and 26 trailer stalls.

The requested entitlements include, pursuant to LAMC Section 12.24 U.14, a Conditional Use Permit for Major Development Projects for a development project resulting in a construction of 250,000 square feet or more of warehouse floor area; and pursuant to LAMC Section 16.05, Site Plan Review for a development project resulting in an increase in 50,000 square feet or more of non-residential floor area.

PREPARED BY:
The City of Los Angeles
Department of City Planning

APPLICANT:
Roxford XC, LLC

October 2022

INITIAL STUDY

TABLE OF CONTENTS

Page

1. Introduction **3**

2. Executive Summary **7**

3. Project Description **13**
- 3.1. Project Summary 13
- 3.2. Environmental Setting 13
- 3.3. Description of Project 15
- 3.4. Requested Permits and Approvals 15

4. Environmental Checklist **15**
- I. Aesthetics 16
- II. Agriculture and Forestry Resources 19
- III. Air Quality 21
- IV. Biological Resources 26
- V. Cultural Resources 29
- VI. Energy 31
- VII. Geology and Soils 32
- VIII. Greenhouse Gas Emissions 36
- IX. Hazards and Hazardous Materials 45
- X. Hydrology and Water Quality 50
- XI. Land Use and Planning 54
- XII. Mineral Resources 55
- XIII. Noise 56
- XIV. Population and Housing 58
- XV. Public Services 59
- XVI. Recreation 61
- XVII. Transportation/Traffic 62
- XVIII. Tribal Cultural Resources 64
- XIX. Utilities and Service Systems 69
- XX. Wildfire 72
- XXI. Mandatory Findings of Significance 74

5. Appendix

- A. Air Quality Study, Noah Tanski Environmental Consulting, February 1, 2022
- B. Greenhouse Gas Study, Noah Tanski Environmental Consulting, April 12, 2022
- C. Noise Study, Noah Tanski Environmental Consulting, February 1, 2022
- D. Tree Report, WRA, Inc., May 2022
- D1. Updated Tree Report, WRA, Inc., September 2022
- E. Geotechnical Report, TGR Geotechnical, Inc., October 6, 2020
- F. Biological Resources Report, WRA, Inc., April 2022
- F1. Updated Biological Resources Report, WRA, Inc., September 2022
- G. Site Assessment and Human Health Risk Evaluation Report, Hazard Management Consulting Inc., January 10, 2021
- H. Soil Removal Action Work Plan, Hazard Management Consulting Inc., January 11, 2021

I. Hazard Management Consulting Clarification Letter, Hazard Management Consulting Inc., March 17, 2022
J. Phase II Environmental Assessment Report, L3 Technologies, Inc., September 3, 2020
K. Transportation Assessment Study, Ganddini Group, Inc., April 21, 2022
L. LADOT Letter, August 5, 2022
M. Native American Heritage Commission Sacred Lands File Search Letter, May 16, 2022

INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed 15827 Roxford Street ("Project"). The Proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Mitigated 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: (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 application for the Proposed Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

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 concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four 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.

1.3. CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared an Initial Study to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the Proposed Project would not have significant environmental impacts that would require further study.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Proposed Project may have a significant effect on the environment. This Initial Study determined that the Proposed Project could have potentially significant environmental impacts but mitigation measures agreed to by the applicant would avoid or reduce such impacts to a point where clearly no significant impacts would occur.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) or Negative Declaration (ND) is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the document and the locations where the document can be reviewed. A 20-day review period (or 30-day review period when the document is submitted to the State Clearinghouse for state agency review) is identified to allow the public and agencies to review the document. The notice is mailed to any interested parties and is noticed to the public through publication in a newspaper of general circulation.

The decision-making body then considers the Mitigated Negative Declaration or Negative Declaration, together with any comments received during the public review process, and may adopt the MND or ND and approve the project. In addition, when approving a project for which an MND or ND has been prepared, the decision-making body must find that there is no substantial evidence that the project will have a significant effect on the environment, and that the ND or MND reflects the lead agency's independent judgement and analysis. When adopting an MND, the lead agency must also adopt a mitigation monitoring program to ensure that all proposed mitigation measures are implemented to mitigate or avoid significant environmental effects.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**15827 Roxford Street**
ENVIRONMENTAL CASE NO.	ENV-2021-8928-MND
RELATED CASES	CPC-2021-8927-CU-SPR

PROJECT LOCATION	**15827 Roxford Street**
COMMUNITY PLAN AREA	Sylmar
EXISTING GENERAL PLAN DESIGNATION	Limited Industrial
PROPOSED GENERAL PLAN DESIGNATION	Limited Industrial
EXISTING ZONING	M1-1; P-1
PROPOSED ZONING	M1-1; P-1
COUNCIL DISTRICT	7

LEAD CITY AGENCY	**City of Los Angeles Department of City Planning**
STAFF CONTACT	Sophia Kim
ADDRESS	200 North Spring Street, Room 763 Los Angeles, CA 90012
PHONE NUMBER	(213) 978-1208
EMAIL	Sophia.Kim@lacity.org

APPLICANT	**Roxford XC, LLC**
ADDRESS	3010 Old Ranch Parkway #470
PHONE NUMBER	562-546-0200 (APPLICANT) 510-381-1611 (REPRESENTATIVE: Shean Kim)

PROJECT DESCRIPTION

The project involves the demolition of an existing 182,230 square foot of warehouse building and construction, use, and maintenance of two new warehouse buildings with a total of approximately 612,227 square feet including 15,742 square feet of ancillary office space and 17,080 square feet of mezzanine. The proposed project will provide surface parking including 341 vehicle parking spaces, 95 dock doors, and 26 trailer stalls.

The requested entitlements include, pursuant to LAMC Section 12.24 U.14, a Conditional Use Permit for Major Development Projects for a development project resulting in a construction of 250,000 square feet or more of warehouse floor area; and pursuant to LAMC Section 16.05, Site Plan Review for a development project resulting in an increase in 50,000 square feet or more of non-residential floor area. The project may also require additional approvals and permits, including but not limited to those for project construction activities such as excavation, shoring, grading (368,963 cubic yards), foundation, haul route approval, removal of street trees, and building and tenant improvements.

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

ENVIRONMENTAL SETTING

The subject property, consisting of four contiguous parcels on a gently sloping, irregular-shaped, totaling approximately 1,216,764 square feet (27.93 acres) with a frontage of approximately 370 feet along Telfair Avenue and 158 feet along Roxford Street. Currently, the site is developed with a one-story industrial warehouse building which is subject to demolition with the implementation of the proposed project.

The project site is located within the Sylmar Community Plan, which is one of 35 Community Plans which together form the land use element of the General Plan. The Community Plan designates the site for Limited Industrial land uses with the corresponding zones of M1 and MR1. The project site is zoned M1-1 and is thus consistent with the existing land use designation. The site is located within the Local Emergency Temporary Regulations -Time Limits and Parking Relief (ZI-2498), the Parcel/Tract Map Conditions Clearance (ZI-1022), the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI-2427), and the State Enterprise Zone Los Angeles (ZI-2374). The site is located within a hillside area, an Airport Hazard at 770 feet height limit above elevation 790, a High Wind Velocity Area, and a Special Grading Area (BOE). The site is not located within a High Fire Hazard Severity Zone, Flood Zone, Methane Hazard Site, Landslide area, liquefaction zone, or tsunami inundation zone.

The project site is located in Sylmar within an established industrial and public facilities area southeast of the I-5 and I-210 freeway interchange. The project site is located north of Roxford Street, west of Telfair Avenue, and east of the I-5 freeway. The area north of Roxford Street, where the project site is located, is zoned M1-1 with some parcels zoned M1-1VL and PF-1VL. The neighborhood on the southern side of Roxford Street is developed with residential uses and is zoned RA-1-K with C2-1XL-K-CPIO at the northwest corner of the neighborhood along Encinitas Avenue. To the west of the I-5 freeway is the City of Los Angeles Water and Power

facility zoned [Q]OS-1XL. The site is separate from this open space area and reservoir by the I-5 freeway.

The abutting parcels to the south and east are zoned M1-1 and developed with one-story industrial warehouses, to the north is zoned (Q)M1-1VL and PF-1VL and developed with a one-story industrial warehouse, and to the west is the I-5 freeway zoned PF-1VL.

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

SUMMARY OF UPDATES TO THE MITIGATED NEGATIVE DECLARATION OCTOBER 2022

On October 3, 2022, the project applicant clarified that there has been a change in the project description after the MND publication. The two new warehouse buildings square footage has changed from 595,147 square feet to 612,227 square feet by adding 17,080 square feet of mezzanine. The additional mezzanine square footage will not constitute warehouse and office space, nor would it be associated with any additional workers or vehicle trips. In addition, the total number of surface parking space has been reduced from 382 vehicle spaces to 341 vehicle spaces. The applicant is still providing more parking spaces than the required 218 parking spaces per LAMC. There is no change to the overall impact, nor the required mitigation measures for this project with the additional mezzanine square footage and reduction in parking spaces.

In addition, there were changes and edits made to the Tree Report and Biological Technical Report as a result of the incorporation of an updated site plan for the 15827 Roxford street Project (project) located in the Sylmar community Plan Area of the City of Los Angeles, California. The updated site plan for the project includes an update to the grading plan and landscape plan associated with the project (Tree Report and Biological Technical Report Figures 3a, and 3b). The site plan changes included the replacement on a planned parking lot in the south-eastern corner of the project known as “the panhandle” with a stormwater detention basin and bio-planter to treat stormwater flows onsite before they leave the project area.

As the stormwater basin and bio-planter areas of the panhandle will require substantial grading to create, impacts to protected trees (#339 and #335) in the area will not be avoidable (Tree Report: Appendix B, page 13 of 13). As these trees were also planned on being removed as a part of the previous site plan to place a parking lot in the panhandle, there is no change to total protected tree impacts (five coast live oak [Quercus agrifolia]) or required mitigation (4:1 ratio, total of 20 planted coast live oak trees) as a part of the landscape plan.

The updated landscape plan has reduced the amount 24” box planters of coast live oaks to be planted as a part of the plan from 55 to 51 trees. While the updated landscape plan includes a reduction of four individual plants to be included as a part of the landscaping, the revised total (51) still substantially exceeds the required mitigation (20) for protected trees using container plants of this size (24” box planters).

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

None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. As specified in AB52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on February 3, 2022. The Gabrieleno Band of Mission Indians – Kizh Nation requested to engage in tribal consultation and a meeting was scheduled for April 14, 2022. On April 6, 2022, a request was received to reschedule the meeting to April 14, 2022. On April 13, 2022, a request was received to cancel the meeting and the Gabrieleno Band of Mission Indians – Kizh Nation stated that they would like to defer the project to Donna Yocum with the San Fernando Band of Mission Indians. The Department did not receive any communication from Donna Yocum. A tribal consultation conclusion letter was emailed to the Gabrieleno Band of Mission Indians – Kizh Nation on April 29, 2022.

On March 3, 2022, Fernandeño Tataviam Band of Mission Indians (FTBMI) requested to engage in tribal consultation. The first meeting was on March 16, 2022, and Jairo Avila shared an oral testimony about general concerns with the subject site and the region due to resources found near the site and the possibility of burials inside the reservoir. He suggested to conduct the Sacred Land Files search and requested to have a follow up meeting after sending the Sacred Land report. On April 13, 2022, an email was received an email stating that the Cultural Resources Management Division of the Fernandeño Tataviam Band of Mission Indians has completed an assessment referencing archaeological records and traditional cultural knowledge, project plans, and the October 2020 geotechnical assessment. The FTBMI recognizes the project area to be culturally significant and sensitive for tribal cultural resources (TCRs). This is due to the extensive prehistoric-historic tribal use of the area and features associated with the San Fernando Mission. The letter included several tribal cultural resources mitigation measures. The City reviewed the suggested mitigation measures. On May 10, 2022, the City emailed FTBMI a letter with City mitigation measure languages addressing the suggested mitigation measures by FTBMI. On May 12, 2022, FTBMI responded to the suggested mitigation measures language is acceptable with a minor clarification to develop a Treatment and Disposition Plan once a significant resource is encountered. No other responses were received from any tribes during the 30-day period. Thus, impacts related to tribal cultural resources will be less than significant with mitigations.

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.

Sophia Kim	City Planner
PRINTED NAME	**TITLE**
	10/12/22
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 project involves the demolition of an existing 182,230 square foot of warehouse building and construction, use, and maintenance of two new warehouse buildings with a total of approximately 612,227 square feet including 15,742 square feet of ancillary office space and 17,080 square feet of mezzanine. The proposed project will provide surface parking including 341 vehicle parking spaces including 103 EV parking spaces, 95 dock doors, and 26 trailer stalls. The project site will provide one access driveway on Roxford Street and three access driveways on Telfair Avenue. Two driveways on Telfair Avenue will serve truck traffic, and one driveway on Telfair Avenue will serve passenger cars. The driveway on Roxford Street will serve both truck and passenger car traffic.

The requested entitlements include, pursuant to LAMC Section 12.24 U.14, a Conditional Use Permit for Major Development Projects for a development project resulting in a construction of 250,000 square feet or more of warehouse floor area; and pursuant to LAMC Section 16.05, Site Plan Review for a development project resulting in an increase in 50,000 square feet or more of non-residential floor area.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location and Existing Conditions

The subject property, consisting of four contiguous parcels on a gently sloping, irregular-shaped, totaling approximately 1,216,764 square feet (27.93 acres) with a frontage of approximately 370 feet along Telfair Avenue and 158 feet along Roxford Street. Currently, the site is developed with a one-story industrial warehouse building which is subject to demolition with the implementation of the proposed project.

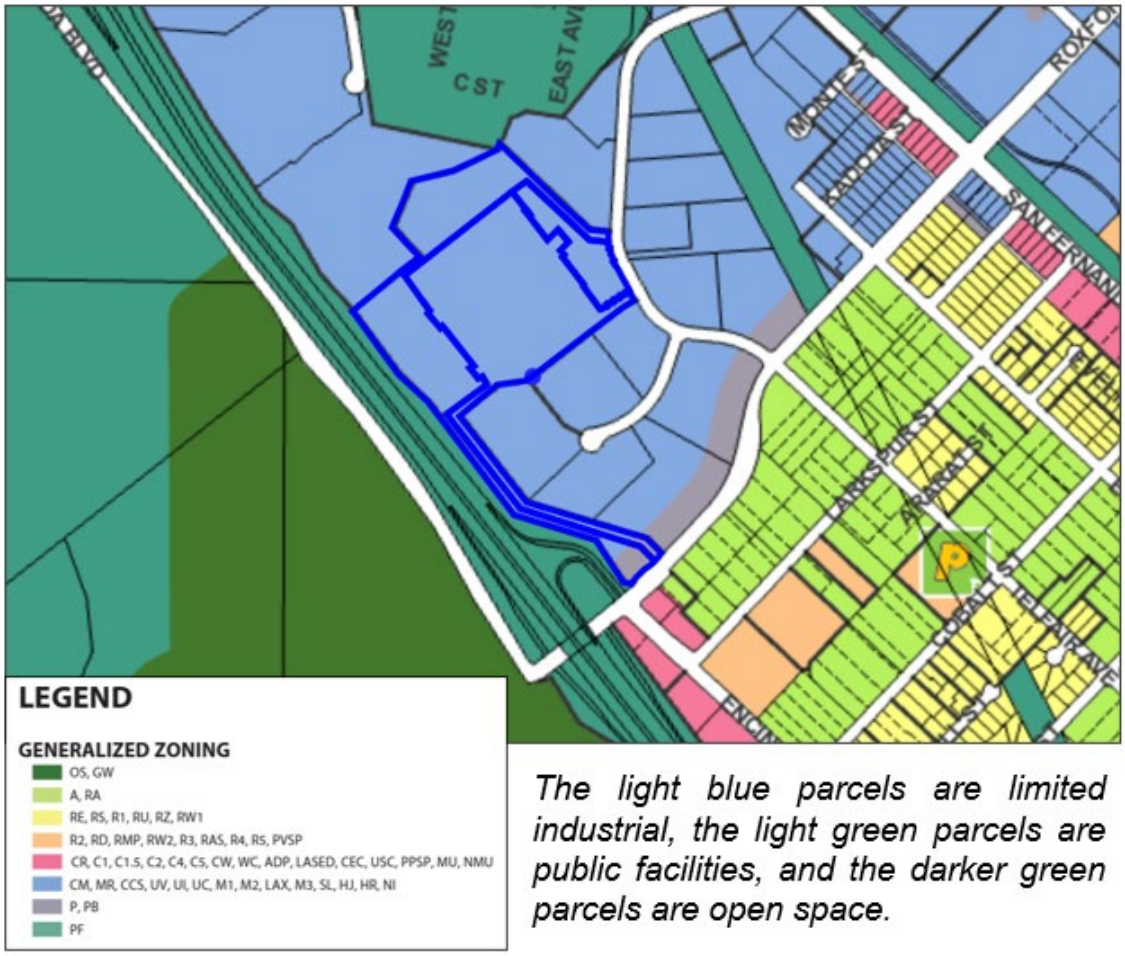
The project site is located within the Sylmar Community Plan, which is one of 35 Community Plans which together form the land use element of the General Plan. The Community Plan designates the site for Limited Industrial land uses with the corresponding zones of M1 and MR1. The project site is zoned M1-1 and is thus consistent with the existing land use designation. The site is located within the Local Emergency Temporary Regulations -Time Limits and Parking Relief (ZI-2498), the Parcel/Tract Map Conditions Clearance (ZI-1022), the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI-2427), and the State Enterprise Zone Los Angeles (ZI-2374). The site is located within a hillside area, an Airport Hazard at 770 feet height limit above elevation 790, a High Wind Velocity Area, and a Special Grading Area (BOE). The site is not located within a High Fire Hazard Severity Zone, Flood Zone, Methane Hazard Site, Landslide area, liquefaction zone, or tsunami inundation zone.

3.2.2 Surrounding Land Uses

The project site is located in Sylmar within an established industrial and public facilities area southeast of the I-5 and I-210 freeway interchange. The project site is located north of Roxford Street, west of Telfair Avenue, and east of the I-5 freeway. The area north of Roxford Street, where the project site is located, is zoned M1-1 with some parcels zoned M1-1VL and PF-1VL. The neighborhood on the southern side of Roxford Street is developed with residential uses and is zoned RA-1-K with C2-1XL-K-CPIO at the northwest corner of the neighborhood along Encinitas Avenue. To the west of the I-5 freeway is the City of Los Angeles Water and Power facility zoned [Q]OS-1XL. The site is separate from this open space area and reservoir by the I-5 freeway.

The abutting parcels to the south and east are zoned M1-1 and developed with one-story industrial warehouses, to the north is zoned (Q)M1-1VL and PF-1VL and developed with a one-story industrial warehouse, and to the west is the I-5 freeway zoned PF-1VL.

Figure 1: Zoning of site and surrounding area



The light blue parcels are limited industrial, the light green parcels are public facilities, and the darker green parcels are open space.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The subject property consists of four gently sloping, irregular-shaped, contiguous parcels, totaling approximately 1,217,123 square feet (28 acres) with a frontage of approximately 370 feet along Telfair Avenue and 158 feet along Roxford Street. Currently, the site is developed with a one-story industrial warehouse building which is subject to demolition with the implementation of the proposed project.

REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Mitigated Negative Declaration 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 L.A.M.C. Section 12.24 U.14, **Conditional Use Permit for Major Development Projects** for a development project resulting in a construction of 250,000 square feet or more of warehouse floor area.
- Pursuant to L.A.M.C. Section 16.05, a **Site Plan Review** for a development project resulting in an increase in 50,000 square feet or more of non-residential floor area.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route, street tree removal, excavation permits (approximately 368,963 cubic yards of dirt will be graded and removed from the site, and approximately 199,963 cubic yards of dirt will be exported), foundation permits, building permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[1]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

[1] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed Dec. 2, 2016.

	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 non-urbanized areas, substantially degrade the existing visual character or quality of public views 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 involves the construction of two one-story warehouse buildings on an industrial site. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. No designated scenic vistas in the local area would be impeded, and the project will not substantially block any scenic vistas. Therefore, there will be no impact on aesthetics and no impact on a scenic vista. No mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature 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. The City of Los Angeles General Plan Transportation Element (Map E: Scenic Highways in the City of Los Angeles) indicates that no City-designated scenic highways are located near the Project Site. Therefore, the Project would result in no impact to scenic resources within a City-designated scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality 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?

No Impact. The project is in an urbanized, developed area. A significant impact would occur if the Proposed Project would conflict with applicable zoning and other regulations governing scenic quality. The project is compatible with the Community Plan and the Urban Design Guidelines. There are no additional regulations governing scenic quality that apply to the subject site. Additionally the Proposed Project will not change the visual character of its surroundings. Surrounding properties are developed with one-story industrial developments similar to the one proposed. Therefore, no impact on aesthetics will occur and no mitigation is required.

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

No 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 facades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. The Project involves the construction, use, and maintenance of two new one-story warehouse buildings. 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. The Proposed Project does not include any elements or features that would create substantial new sources of glare. Therefore, no impact on aesthetics and no impact on light and glare would occur and no mitigation is required.

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. The Project Site is located within a developed and urbanized area of the City. No farmland or agricultural activity exists on or near the Project Site. No portion of the Project Site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. As such, no impacts would occur, and no mitigation is required.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the L.A.M.C. The Project Site has a land use designation of Limited Industrial and is currently zoned M1-1. As such, the Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site. As such, no impacts would occur, and no mitigation is required.

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. As mentioned previously, the Project Site has a land use designation of Limited Industrial and is zoned for industrial uses. As such, the Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. As such, no impacts would occur, and no mitigation is required.

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

No Impact. The Project Site is not designated or zoned for forest or timberland or used for foresting. Additionally, the Project Site is located in an urbanized area of the City and is not within any forestland area. As such, no impacts would occur, and no mitigation is required.

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

No Impact. Neither the Project Site nor nearby properties are currently utilized for agricultural or forestry uses. The Project Site is not classified in any “Farmland” category designated by the State of California. As such, no impacts would occur, and no mitigation is required.

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.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

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

Less than Significant. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD is the air pollution control agency for the South Coast Air Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O_3], particulate matter [PM_{10}], and fine particular matter [$PM_{2.5}$]). SCAQMD's 2016 Air Quality Management Plans (2016 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[2] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

[2] SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

(2016–2040 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP. The 2020–2045 RTP/SCS was approved in September 2020. Consistency with the 2020–2045 RTP/SCS is therefore analyzed in Land Use, Greenhouse Gas Emissions and Energy sections of this Initial Study/MND. However, the 2016 AQMP relies on the 2016–2040 RTP/SCS and is therefore addressed for consistency with the 2016 AQMP.

The 2016 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2016–2040 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

The SCAQMD has rules to reduce and offset air quality impacts from truck traffic to large single warehouse buildings with floor space greater than or equal to 100,000 square feet. These are Rule 2305, which establishes a regulatory program called Warehouse Actions and Investments to Reduce Emissions (WAIRE), and Rule 316, which establishes a fee schedule to support this. WAIRE involves first calculating the truck traffic expected at a warehouse. Then, through a menu of options, including the installation of solar panels, the purchasing of electric delivery vans, and the installation of HEPA filters at nearby residences, a project may earn points used to offset the emissions from the truck traffic. This program is enforced through regulatory compliance, not through any CEQA mitigation measures. As the project includes two warehouse buildings each with square footage above 100,000 square feet, SCAQMD Rules 2305 and 316 will apply.

Additionally, an Air Quality Study, conducted by Noah Tanski Environmental Consulting dated February 1, 2022, evaluated the project for consistency with state and local policies. As detailed in the study (attached as Appendix A) the proposed warehouse project is consistent with SCAQMD 2016 AQMP, SCAG 2016-2040 RTP/SCS, and the Los Angeles General Plan Air Quality Element. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less than Significant. A significant impact would occur if the Proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Project construction and operation emissions are estimated using California Emissions Estimator Model (CalEEMod), a statewide land use emissions computer model designed to quantify potential criteria pollutant associated with both construction and operations from land use projects.

According to the CalEEMod model results as summarized in the Air Quality Study conducted by Noah Tanski Environmental Consulting dated February 1, 2022, overall construction (maximum daily emission) for the Proposed Project would not exceed the SCAQMD thresholds for the criteria pollutants Volatile Organic Compounds (VOC), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Sulfur Dioxide (SOx), and Respirable Particulate Matter (PM10 and PM2.5).

The Project's maximum daily regional and local emissions from construction, as estimated using SCAQMD's CalEEMod 2020.4.0 model, are detailed in the Air Quality Study (attached as Appendix A). The Project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NOX, CO, SOX, PM10, or PM2.5. Local emissions also would not exceed SCAQMD LSTs for NOX, CO, PM10, or PM2.5. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

Despite having less than significant air quality impacts related to construction emissions, the Project has elected to commit to the utilization of construction equipment that meets or exceeds the equivalent emissions performance of EPA Tier 4 Final standards for off-road engines. Therefore, the Project adopts the following Project Design Feature (PDF):

PDF-AQ-1 The Project shall utilize construction equipment that meets or exceeds USEPA Tier 4 Final emissions standards.

Emissions associated with the Project's operations were also calculated using CalEEMod 2020.4.0. As detailed in the Air Quality Study, maximum daily emissions would not exceed SCAQMD regional significance thresholds for VOC, NOX, CO, PM10, and PM2.5, nor would they exceed SCAQMD localized significance thresholds (LSTs) for NOX, CO, PM10, or PM2.5.

The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as discussed Air Quality Study, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as nonattainment. As a result, the Project's construction and operations-related emissions will have a less than significant impact on the net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant. A significant impact would occur if the Proposed Project were to expose sensitive receptors to pollutant concentrations. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement

homes, residences, schools, playgrounds, childcare centers, and athletic facilities. As described in the Air Quality Study (Appendix A) The Project Site is surrounded by industrial uses. The main portion of the Project site is located approximately 1,000 feet west of residential uses along El Dorado Avenue, over 800 feet west of residential uses along Telfair Avenue, and over 1,000 feet northwest of residential uses along Roxford Street.

A small extension of the Project site would extend along an existing driveway to Roxford Street. At the connection with Roxford Street, the Project proposes to improve the existing driveway and construct a small surface parking lot with less than 75 spaces. This parking lot, located 140 feet from residential uses, is the only portion of the Project that would be located within 800 feet of - sensitive receptors. The proposed parking lot is for standard vehicles. Trucks will not be parking, loading, or unload in this parking lot. As described in the Air Quality Study the nearby residential sensitive receptors will not be exposed to substantial pollutant concentrations.

The project is subject to grading and construction standards to mitigate air pollution and dust impacts. The project is required to meet SCAQMD District Rule 403 as well as the City's requirements for demolition, grading, and construction related to air pollution. SCAQMD District Rules 2305 and 136 also apply to project operations and are designed specifically to reduce emissions from large warehouse projects. Therefore, the project is not expected to contribute to pollutant concentrations or expose surrounding residences and other sensitive receptors to substantial pollutant concentrations and no mitigation is required.

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

Less than Significant. No other emissions, including objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as the Project would include the development of two surface parking areas and ancillary uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[3] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the

[3] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed June 9, 2021.

public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[4]

The proposed warehouse use would not result in activities that create objectionable odors. Therefore, the Proposed Project would result in a less than significant impact related to objectionable odors and no mitigation is required.

4 SCAQMD, Rule 402, Nuisance, adopted May 7, 1976..

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?	☐	☐	☐	☒

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. The proposed project is within a highly urbanized area that does not contain any biological resources or habitat area. The site is zoned M1-1 and the General Plan Land Use

Designation is Limited Industrial. The site is improved with a 167,189 square-foot one-story warehouse building. The project would redevelop the site with 589,000 square-foot warehouse buildings. Development of the Project Site will 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 California Department of Fish and Game or U.S. Fish and Wildlife Service, and no impacts would occur. No mitigation is required.

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 would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The Project Site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. 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 the California Department of Fish and Wildlife or the United States Fish and Wildlife Services, and no impacts would occur and no mitigation is required.

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 protect wetlands would be modified or removed by a project. The Project Site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. The Project Site is located in a highly urbanized area and developed with an approximately 167,189 square-foot one-story warehouse building. Therefore, the Proposed Project would not have any effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and no impacts would occur and no mitigation is required.

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?

No 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. Due to the highly urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for native resident or migratory species or contain native nurseries. Therefore, the Proposed Project would not interfere with wildlife movement or impede the use of native wildlife nursery sites, and no impact would occur and no mitigation is required.

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

Less than Significant. 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). The Project Site contains five locally-protected oak trees, and 172 non-protected trees. A total of five protected trees are expected to be removed. Trees expected to be removed are coast live oaks ranging in size from 5.39 inches to 24.30 inches DBH and are 4 multi trunk (Tree #231, #232, #233, #339) and one single trunk (Tree #335), with a total of 51.36 inches (Appendix D). A tree removal permit will be required for any alteration, removal, or relocation of protected trees. As per the possible tree replacement requirements, the Protected Tree Ordinance requires that for each protected tree that is approved for removal, a minimum of four trees of the same protected *Quercus* genus as the removed tree, each of a minimum 15-gallon container size, shall be planted on the Project site. The 15-gallon saplings should be 1-inch at 1 foot trunk height and replace the value of the removed trees. Therefore, removal of the five protected trees will require tree replacement of a minimum of 20 or 52 native *Quercus* species saplings. 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 CFGC 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. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands), and a less than significant impacts would occur and no mitigation is required.

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. Therefore, the Proposed Project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur and no mitigation is required.

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?	☐	☐	☒	☐

a) Cause a substantial adverse change in the significance of a historical resource as 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. The Project involves the construction, use, and maintenance of two new one-story warehouse buildings. None of the structures on site have been identified as a historic resource by local or state agencies, and the Project Site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and the Los Angeles Historic-Cultural Monuments Register. In addition, the site was found to not retain sufficient integrity for listing in the National Register based on data available on the City's HistoricPlacesLA website (the City's new online information and management system created to inventory Los Angeles' significant historic resources). Therefore, impacts will be less than significant and no mitigation is required.

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 was removed, altered, or destroyed as a result of the Proposed Project. 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. The applicant shall abide by current law if archaeological resources are discovered during grading or construction. Therefore, impacts will be less than significant and no mitigation is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation activities associated with project construction. No human remains are expected to be located on the Project Site; however, the applicant shall abide by current law if human remains are discovered during grading or construction. Therefore, impacts will be less than significant and no mitigation is required.

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?	☐	☐	☒	☐

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 be 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. In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the 2013 Los Angeles Green Code and as it may be subsequently amended or modified. Therefore, the impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The Project involves the construction, use, and maintenance of two new one-story warehouse buildings. As stated above, the project's improvements and operations would be in accordance with applicable State Building Code Title 24 regulations and City of Los Angeles Green Building Code, which impose energy conservation measures. Additionally, the project includes installation of solar panels on the roof. As such, impacts of the project would be less than significant, and no mitigation is required.

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?	☐	☐	☒	☐

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.

No 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. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. 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. As such, the Proposed Project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. Therefore, no impacts would occur and no mitigation is required.

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, the Proposed Project could expose people and structures to strong seismic ground shaking. The design of the Project would be in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits) will mitigate the potential effects of strong ground shaking. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the L.A.M.C., which incorporates the IBC. Compliance with current California Building Code and L.A.M.C. requirements will minimize the potential to expose people or structures to substantial risk of loss, injury or death. Therefore, impacts related to seismic ground shaking will be less than significant and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. 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. The site is not located in the California Department of Conservation's Seismic Hazard Zones Map, and the Project Site is not located within a liquefaction zone. Therefore, no impact related to seismic-related ground failure, including liquefaction, would occur and no mitigation is required.

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. According to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map

for this area shows the Project Site is not located within a landslide hazard zone. The Project Site is located in a hillside area and a Bureau of Engineering Special Grading Area. The Project will be required by the Bureau of Engineering to comply with the Los Angeles Building Code. Therefore, the Proposed Project would not expose people or structures to potential effects resulting from landslides, and no impacts would occur and no mitigation is required.

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

Less Than Significant Impact. Construction of Proposed Project would result in ground surface disturbance during site clearance, excavation, and grading, which could create the potential for soil erosion to occur. Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQBC) through the City's Stormwater Management Division. Therefore, the Proposed Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant, and no mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. 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. The Proposed Project would not have the potential to expose people and structures to seismic-related ground failure, including liquefaction and landslide. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is not identified as being located in an oil field or within an oil drilling area. The project is identified as being in a hillside area and a special grading area. The Proposed Project would be required to implement standard construction practices that would ensure that the integrity of the Project Site is maintained. The Project 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, the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less-than-significant and no mitigation is required.

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?

No 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 have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. Soils on the Project Site may have the potential to shrink and swell resulting from changes in the moisture content. The Project Site is located in a BOE Special Grading Area known to have expansive soils. The Project will be required by the Bureau of

Engineering to comply with the City of Los Angeles Municipal Code and all building and grading requirements. Therefore, the Project would be less than significant, and no mitigation is required.

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 existing sewer lines that serve the Project Site and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation is required.

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

Less Than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or unique geologic features that presently exist within the Project Site. The Project Site is located within an urbanized area that has been subject to grading and development in the past and is not known to contain any unique paleontological resource or site or unique geologic feature. Potential paleontological or geologic impacts of the Project would be less than significant, and no mitigation is required.

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?	☐	☐	☒	☐

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

Less Than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and anthropogenic (human generated), that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). Without the greenhouse effect, the Earth would be a frozen globe with an average surface temperature of about 5°F. The City has adopted the Green New Deal to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 179,890). As the LAGBC includes applicable provisions of the State's CALGreen Code, a new project that can demonstrate it complies with the LAGBC is considered consistent with statewide GHG reduction goals and policies including AB32 (California Global Warming Solutions Act of 2006). According to the GHG Impacts analysis conducted by Noah Tanski Environmental Consulting dated April 12, 2022 (Appendix B), impacts would be less than significant given the project will be consistent with Senate Bill SB 375 and the 2016 to 2040 Regional Transportation Plan/Sustainable Communities Strategy. Through required implementation of the LAGBC, and compliance with existing regulations, the Proposed Project would be consistent with local and statewide goals and polices aimed at reducing the generation of GHGs. Therefore, the Proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to emissions. Impacts will be less than significant and no mitigation is required.

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

Less Than Significant Impact. The California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS is contained in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled that contribute to GHG emissions, as required by AB 32. The project is the construction, use, and maintenance of two new warehouse buildings on an existing industrial site within an urbanized area. It would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS. Impacts will be less than significant, and no mitigation is required.

Section 15064.4 of the CEQA guidelines recommends quantification of a Project's GHG emissions. However, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 2008 Scoping Plan and its subsequent updates, as well as the City's Sustainable pLAn/Green New Deal. Nonetheless, the quantification of the Project's GHG emissions is being done for informational purposes only. The Project would generate an incremental contribution to and cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix B of this Initial Study/MND).

As presented in Table 1 below, construction of the Project is estimated to generate a total of 2,785.9 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-

year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B of this Initial Study/MND.

Table 1 Construction-Related GHG Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	1,416.2
2024	1,369.7
Total	2,785.9
Amortized Over 30 Years[b]	**92.9**

MTCO2e = metric tons of an equivalent mass of carbon dioxide

[a] *CO2e was calculated using CalEEMod and the results are provided in Section 5 of the Construction CalEEMod output file within Appendix B of this Initial Study/MND.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

Source: Noah Tanski Environmental Consulting, 2022.

Operation

The analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and its effect on global climate change would not be cumulatively considerable (see Table 2). For these reasons, the Project's cumulative contribution to global climate change would be **less than significant**.

Table 2: Operational Greenhouse Gas Emissions

Emission Source	Project Without Project Design Features CO_2e (metric tons)
Area	<0.1
Energy	940.7
Mobile	2,063.7
Stationary	289.8
Solid Waste	289.8
Water/Wastewater	777.5
Construction	92.9
Total Emissions	**4,164.7**

Note: Numbers may not add up exactly due to rounding. Source: Noah Tanski Environmental Consulting, 2022.

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, into law. AB 32 commits the State to reducing GHG emissions to 80 percent below 1990 levels by 2050.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020.

EO B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[5] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[6]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.[7]

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[8] The CEQA

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5 Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

6 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

7 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

8 CEQA Guidelines Section 15064.7(c).

Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[9]

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[10,11] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[12] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[13]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is SCAG's 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG's Sustainable Communities Strategy, City of Los Angeles Green LA Action Plan (LA Green Plan)/ClimateLA, and Sustainable City pLAn/L.A.'s Green New Deal.

A significant impact would occur if the Project would conflict with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Sustainable City pLAn/L.A. Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As discussed previously, the Project would not generate any new vehicle trips or increase congestion at nearby intersections. In addition, the Project would not result in a net increase in solid waste. Therefore,

9 CEQA Guidelines Section 15130 (f).
10 CEQA Guidelines Section 15064.4(a).
11 CEQA Guidelines Section 15064.4(a).
12 CEQA Guidelines Section 15064.4(a)(1)-(2).
13 CEQA Guidelines Section 15064.4(b).

the following consistency discussion is limited to energy-related plans and policies. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's Climate Change Scoping Plan

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Mandatory Regulatory Compliance Measures

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions.

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill (SB) 2X) requires that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016. It is noted that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements inasmuch as the Project is served by LADWP, which is committed to achieving the increase in renewable energy resources by the required dates. The Project's electricity GHG emissions in this analysis do not account for these rapidly changing, and escalating, renewables requirements. By the Project's estimated buildout year of 2024, it is reasonable to assume that LADWP may supply at least 45 percent renewable energy, in line with the Green New Deal's 55% target for 2025. As such, GHG emissions from the Project's electricity use would likely be considerably lower than what is identified in this analysis.

- **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.

SCAG 2020–2045 RTP/SCS

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy 2020–2045 RTP/SCS) was approved on September 3, 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to carbon pricing, and using an electric vehicle will be easier as a result of an expanded regional charging network.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[14] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation.[15] The SB 375 target focuses on the amount of vehicle travel per capita. The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.[16]

As the Project's net Daily Vehicle Trips (DVT) does not exceed the net 250 daily DVT threshold, the Project would not conflict with the implementation and goals of the 2020–2045 RTP/SCS with regard to vehicle miles traveled (VMT). However, the 2020–2045 RTP/SCS does include measures to improve energy efficiency. The Project's consistency with energy efficiency category of strategies and policies is discussed in more detail below.

Energy Efficiency Strategies and Policies

One goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient

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14 SCAG, Final 2020–2045 RTP/SCS, Making Connections, May 7, 2020, p. 5.

15 California Air Resources Board, Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, June 2017, p. B-32.

16 California Air Resources Board, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, Staff Report, p. 28.

landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would use LID techniques to minimize the amount of stormwater that leaves the Project Site.

City of Los Angeles Sustainable City pLAn/City of LA Green New Deal

The City of Los Angeles began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan/ClimateLA) in 2007. This plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code, as discussed below.

Building upon the LA Green Plan, the Sustainable City pLAn was adopted in 2015 and 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. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to mobility and transit, including the reduction of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. Although the Sustainable City pLAn mainly targets GHG emissions related to City-owned buildings and operations, certain reductions would also benefit the Project. Such measures include increasing renewable energy usage to 100 percent by 2045 which would reduce energy related emissions. In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as the City's Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals such as the installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028.[17]

As discussed previously, the Project's net Daily Vehicle Trips (DVT) does not exceed the net 250 daily DVT threshold. The Project would not conflict with the implementation and goals of the 2020–2045 RTP/SCS with regard to vehicle miles traveled (VMT). In addition, the Project would use native and drought-tolerant plant species in the landscaping to minimize water use. The project would comply with the Green Building Code requirement by providing 115 EV parking spaces equal to 30 percent of the Project's parking spaces as electric vehicle (EV) to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.[18] Therefore, the Project would be consistent with the Sustainable City pLAn and the L.A. Green New Deal.

Conclusion

In summary, the Project would not generate GHG emissions that may have a significant impact on the environment nor would the Project conflict with an applicable plan, policy or regulation

[17] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

[18] However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code. As discussed above, the Project's net Daily Vehicle Trips (DVT) does not exceed the net 250 daily DVT threshold. The Project would not conflict with the implementation and goals of the 2020–2045 RTP/SCS with regard to vehicle miles traveled (VMT). Furthermore, as detailed above, the Project would use native and drought-tolerant plant species in the landscaping to minimize water use and would include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles.

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 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?	☐	☐	☐	☒

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 created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials during the routine transport, use, or disposal of hazardous materials. The project involves the construction, use and maintenance of two one-story warehouse buildings. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. The project will comply with all applicable rules of the Southern California Air Quality Management District. With compliance to applicable standards and regulations and adherence to manufacturer's instructions related to the transport, use, or disposal of hazardous materials, operations associated with the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Project-related construction activities would involve the routine use of hazardous materials, such as fuels, lubricants, and greases in construction equipment and coatings used in construction, during all construction phases. These materials would not be in such quantities or stored in such a manner as to pose a significant safety hazard to onsite construction workers or the general public. Construction activities would also be short-term or one time in nature and would cease upon completion of the proposed Project's construction phase. Project construction workers would also be trained in safe handling and hazardous materials use per HAZWOPER regulations. Additionally, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations including the USDOT regulations listed in the CFR (Title 49, Hazardous Materials Transportation Act); Caltrans standards; and the Cal/OSHA standards. Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the RCRA (CFR, Title 40, Part 263). The proposed Project would also be constructed in accordance with the regulations of LAFD, which serves as the designated CUPA.

Additionally, site grading activities may involve the off-site transportation and disposal of contaminated soil and/or water as disclosed in the Phase II Environmental Assessment Report (Appendix J). Hazard Management Consulting prepared a Soil Removal Action Work Plan (Appendix H) and a Site Assessment and Human Health Risk Evaluation Report (Appendix G) for the project to address site hazards, site clean-up and safe transportation and disposal of hazardous materials from the site. These plans must be reviewed and approved by Department of Toxic Substances Control (DTSC) for compliance with all relevant safety regulations.

Soil at the Site may also require dust monitoring in accordance with SCAQMD Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants. Dust will be monitored at the excavation area, to ensure the safety of the workers, and at the perimeter of the Site, to ensure the safety of the public and to ensure that a public nuisance condition does not occur. Dust monitoring will be conducted and dust monitoring measurements will be recorded on a Dust Monitoring Form or logged on the meters. In areas subject to SCAQMD Rule 1466, dust

monitoring will occur upwind and downwind of the excavation. If dust measurements or visual dust exceed SCAQMD requirements/action levels, then work will stop, or dust suppression/mitigation will be applied until concentrations decline.

Therefore, with the implementation of regulatory requirements, the risk of exposure to workers and the public associated with the routine use, transport, or disposal of hazardous materials would be less than significant. No mitigation is required.

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 Impact. 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 site is not identified by the City of Los Angeles to be a Methane Zone. The Phase II Environmental Assessment Report prepare for the project identifies the following potential hazards on site:

- Soil Vapor: VOCs in soil vapor were detected on-site in locations that would be outside of the proposed building footprint. While VOC vapor levels did not exceed current State screening levels, they did exceed pending supplemental State screening criteria.

- Groundwater: Two VOCs were reported in groundwater at concentrations above screening criteria for drinking water. The constituents detected are typical of degradation produced from other chemicals (chlorinated solvents) and are indicative of a possible old release and not evidence of recent or current possible release. Furthermore, the groundwater detected onsite is not a part of the public drinking water system.

In compliance with DTSC regulations, the applicant is required to prepare a Soil Management Plan (Soil Removal Action Work Plan, Appendix H) and a Human Health Risk Assessment (Site Assessment and Human Health Risk Evaluation Report, Appendix G) to address hazard remediation. The plans include proposed removal of contaminated soils, groundwater monitoring systems, and installation of a vapor detection and ventilation system in the new budling. Prior to the start of site grading, DTSC must review and must approve these plans and project features which insure health and safety of construction workers, building occupants, and the community.

There is an existing one-story warehouse structure on the site built in 1961 that may contain asbestos-containing materials (ACMs) and lead-based paint (LBP). Demolition and removal of existing structure will require compliance with existing State laws regarding safe AMCs and LBP handling, removal and disposal

Compliance with existing regulations will ensure that in a less than significant impact related to the release of hazardous materials into the environment. No mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. 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 within close proximity to a school. The site is not within one-quarter mile of a school. The nearest schools are 0.66 miles (Telfair Avenue and El Casco Street) and 0.9 miles (Herrick Street and La Mesa Street) from the site.

In Addition, the project's Soil Removal Action Plan (attached as Appendix H) prepared by Hazard Management Consulting, Inc., describes how the project will comply with SCAQMD regulations during the construction in order to ensure hazardous materials are not emitted during excavation.

Soil at the Site may also require dust monitoring in accordance with SCAQMD Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants. Dust will be monitored at the excavation area, to ensure the safety of the workers, and at the perimeter of the Site, to ensure the safety of the public and to ensure that a public nuisance condition does not occur. Dust monitoring will be conducted and dust monitoring measurements will be recorded on a Dust Monitoring Form or logged on the meters. In areas subject to SCAQMD Rule 1466, dust monitoring will occur upwind and downwind of the excavation. If dust measurements or visual dust exceed SCAQMD requirements/action levels, then work will stop, or dust suppression/mitigation will be applied until concentrations decline.

If elevated dust measurements or visible dust at the perimeter of the Site boundaries as a result of construction activities at the Site are observed, the Contractor shall enhance mitigation measures to eliminate the presence of visible dust at the Site boundary. Additional dust control measures that may be implemented, if necessary, include: increased watering of the work area, covering of stockpiles, decreasing drop heights; and/or, use of dust suppressing substances. Site conditions will be monitored to evaluate what dust control measures (e.g., water application) will be implemented, as needed.

With compliance with existing city regulations, the Proposed Project would result in a less than significant impact related to the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. 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 Geological Energy Management Division (CalGEM) 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 CalGEM's oversight. The subject site was identified on EnviroStor as a voluntary cleanup site. The project conduced a Phase II Environmental Assessment and prepared a Soil Management Plan and a Human Health and Safety Assessment, all of which are subject to review and approval by DTSC. The project will be required to comply with all health and safety regulations as they relate to site cleanup. As such, impacts will be less than significant, and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within an airport land use plan, nor is it within two miles of a public or public use airport. The project site is identified as an airport hazard site on ZIMAS and is subject to a 770-foot budling height limitation for portions of the site that are at an elevation of 790 feet of higher. The project complies with this height limitation as it is proposed for 40 feet in height. Therefore, no impact will result and no mitigation is required.

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

No Impact. 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 not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur and no mitigation is required.

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

No Impact. The Project Site is located within a highly urbanized area of the City and does not include wildlands or high-fire-hazard terrain or vegetation. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards. Additionally, the proposed industrial building would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. No impacts related to this issue would occur, and no mitigation is required.

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 project could have a significant impact on surface water quality if discharges associated with the project were to create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems.

The project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts and the City's Low Impact Development (LID) Ordinance. The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows.

The project consists of two new one-story warehouse buildings in an area characterized by low-rise industrial buildings. The project does not involve the introduction of new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing condition of the Project Site and its surroundings. As such, potential water quality impacts from the project would be less than significant and no mitigation is required.

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 interfere with groundwater recharge. The Proposed Project would not require the use of groundwater at the Project Site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the project would not require direct additions or withdrawals of groundwater. Excavation to accommodate subterranean levels is not being proposed and the scope of the work thus would not result in the interception of existing aquifers or penetration of the existing water table. Additionally, any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. As such, through project design features and through regulatory compliance, impacts on

groundwater supplies and groundwater recharge would be less than significant and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river 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 the site or area, including through the alteration of the course of a stream or river, such that erosion or siltation would result. The Project Site does not contain, nor is adjacent to, any stream or river. However, there is a reservoir owned by the City of Los Angeles Department of Water and Power approximately 0.24 miles from the closest point of the project site, across, the I-5 freeway from the subject site. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with construction-related Best Management Practices (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. Significant alterations to existing drainage patterns within the Project Site and surrounding area would not occur. Therefore, the Proposed Project would result in less-than-significant impact related to the alteration of drainage patterns and on- or off-site erosion or siltation and no mitigation is required.

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. Site-generated surface water runoff would continue to flow to the City's storm drain system. Impermeable surfaces resulting from the development of the project would not significantly change the volume of stormwater runoff. The site is already developed with impermeable uses including an industrial building and surface parking lot. Accordingly, since the volume of runoff from the site would not measurably increase over existing conditions, water runoff after development would not exceed the capacity of existing or planned drainage systems. 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 L.A.M.C. requirement to address water runoff and storm water pollution. Therefore, the Proposed Project would result in less-than-significant impacts related to flooding on- or off-site and no mitigation is required.

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. Pursuant to local practice and City regulations, stormwater retention would be required as part of City's Standard Urban Stormwater Mitigation Plan (SUSMP) implementation features and the requirements of the Low Impact Development (LID) ordinance requirements. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. Accordingly, with compliance to the LID ordinance, the project would not create or contribute to surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the Proposed Project would result in less-than-significant impacts related to existing storm drain capacities or water quality and no mitigation is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is located in an urbanized area that is currently served by storm drain infrastructure. The site is currently developed with impermeable uses including an industrial building and a surface parking lot. The project would not change the local drainage pattern; therefore, the project would not have the potential to impede or redirect floodwater flows. No impact would occur, and no mitigation measures are necessary.

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 Project Site were sufficiently close to the ocean or other water body to potentially be at risk of seismically induced tidal phenomena (e.g., seiche and tsunami), or was within a flood zone, and if the Project Site utilized, stored or otherwise contained pollutants that would be at risk of release if inundated. The Project Site is not located within a Tsunami Inundation Zone or Flood Zone. Furthermore, the proposed use does not involve the storage or use of substantial quantities of potential pollutants. No impacts would occur and no mitigation is required.

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

No Impact. A significant impact could occur if the project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan. The project involves the construction, use, and maintenance of two new one-story warehouse buildings. As compared to existing conditions (one-story warehouse building) the project would not introduce different uses or potential sources of water pollutants. Moreover, the project would comply with the City's Low Impact Development (LID) ordinance, the primary purpose of which is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows. No impacts would occur and no mitigation is required.

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 is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The Proposed Project, which involves the construction, use, and maintenance of two new warehouse buildings in an urbanized area of Los Angeles, would not divide an established community. Therefore, no impact would occur and no mitigation is required.

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?

Less than Significant. A significant impact may occur if a project is inconsistent with a General Plan policy or zoning regulation was designed expressly to avoid or mitigate an environmental effect at the Project Site. The site is located within the Sylmar Community Plan with a proposed General Plan Land Use Designation of Limited Industrial. The subject site is currently zoned M1-1. The property is not located within any Specific Plans or supplement Use District. The project includes the construction of two new warehouse buildings. The proposed use is permitted in Limited Industrial land use designation and is permitted in the M1-1 zone. The decision maker will determine whether the discretionary requests, including the Conditional Use and Site Plan Review determination will conflict with applicable plans/policies. Impacts related to land use are address through compliance with existing regulations. Therefore, the impact would be less than significant, and no mitigation is required.

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 recovery site. The Project Site is not classified by the City as containing significant mineral deposits. The Project Site is currently designated for Limited Industrial land uses and not as a mineral extraction land use. No active or abandoned wells have been identified on the site. Therefore, the Proposed Project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur and no mitigation is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. 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 Project Site is not classified by the City as containing significant mineral deposits. The Project Site is currently designated for Limited Industrial land use and not as a mineral extraction land use. No active or abandoned wells have been identified on site. Therefore, the Proposed Project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur and no mitigation is required.

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?	☐	☐	☐	☒

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?

Less than Significant. According to the Noise Impact Assessment conducted by Noah Tanski Environmental Consulting dated February 1, 2022 (Appendix C), a noise impact is considered potentially significant if project construction activities extended beyond ordinance time limits for construction or construction-related noise levels exceed the ordinance noise level standards unless technically infeasible to do so. The Proposed Project consists of a construction, use and maintenance of two one-story warehouse buildings.

Construction noise levels will vary at any given receptor and are dependent on the construction phase, equipment type, duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. The project does not propose to deviate from any requirements of the Noise Element of the General Plan, Section 111 of the L.A.M.C., or any other applicable noise standard. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Construction noise is typically governed by ordinance limits on allowable times of equipment operations. The City of Los Angeles limits construction activities to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on any Saturday. Construction is not

permitted on any national holiday or on any Sunday. Therefore, construction noise impacts will be less than significant and no mitigation is required.

Operation phase noise will occur mainly from heating, ventilation, and air conditioning equipment installed on the roof of the new building. However, noise generated by the new equipment is not expected to be substantially greater than noise generated by older HVAC equipment installed on existing buildings near the Project site. As such the new HVAC equipment and other equipment associated with the project would not represent a substantially new type of source of noise in the general vicinity. Furthermore, Project tenants will be required to comply with the Los Angeles Noise Ordinance standards, ensuring that the noise impacts from operation phase noise sources are less than significant. L.A.M.C. Section 112.02 prohibits noise levels from air conditioning, refrigeration, heating, pumping, and filtering equipment. Therefore, operational noise impacts will be less than significant and no mitigation is required.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less than Significant. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. By complying with regulations, the project would result in a less-than-significant impact related to construction vibration and no mitigation is required.

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. The project is not located within two miles of a private airstrip or an airport land use plan. No impact will result and no mitigation is required.

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)?

Less than Significant. A potentially significant impact would occur if the Proposed Project would induce substantial unplanned population growth that would not have otherwise occurred as rapidly or in as great a magnitude. The Proposed Project includes the demolition of an existing 167,000 square foot warehouse building for the construction, use, and maintenance of two new warehouse budlings totaling 589,000 square feet. The project would result in an approximately 422,000 square feet of net new floor area. The project site is zoned M1-1 and is designated for Limited Industrial land uses and the proposed use and floor area are allowed the zone and land use designation. Thus, the growth resulting from the has been planned for in the Sylmar Community Plan. The project will accommodate jobs, in keeping with the Community Plan land use, and would not substantially induce unplanned population growth in the project area, either directly or indirectly. The physical secondary or indirect impacts of population growth such as increased traffic or noise have been adequately studied in other portions of this document. Therefore, the impact would be less than significant and no mitigation is required.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain existing dwelling units. Therefore, no impact will result and no mitigation is required.

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. The Project Site and the surrounding area are currently served by LAFD Fire Station 91, located at 14430 Polk Street, located approximately 2.8 miles east of the Project Site. The Proposed Project involves the net addition of approximately 422,000 square feet of warehouse, 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, 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. Therefore, the Proposed Project would result in a less than significant impact and no mitigation is required.

b) Police protection?

Less Than Significant Impact. The Project has the potential to increase the demand for police services in the area. However, the Project Site and the surrounding area are currently served by the LAPD Mission Community Police Station at 11121 North Sepulveda Boulevard, is approximately 0.7 miles south of the Project Site. 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. Impacts will be less than significant and no mitigation is required.

c) Schools?

No Impact. Implementation of the Proposed Project would not include construction of new residential units, and therefore would not increase the number of students attending the surrounding LAUSD schools. Therefore, the Proposed Project's potential impact on public school services would be less than significant and no mitigation is required.

d) Parks?

No Impact. Since the Project would not be including any housing or any permanent residents, there would be no required open space elements and no expected use of existing park facilities. Therefore, impacts no impact will occur.

e) Other public facilities?

Less than Significant Impact. The Project would introduce two warehouse buildings. The project will not result in a substantial increase in regional employment or population growth. Therefore, the Project would not result in the need to construct any new or physically alter governmental facilities, such as libraries. As such, impacts will be less than significant and no mitigation is required.

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?

Less than Significant. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Proposed Project is allowed by the zone and the use of the project is similar to the existing industrial use. The project will not result in a substantial increase in number of jobs or residents in the area such that deterioration of recreational facilities would occur or be accelerated. Therefore, a less than significant impact would occur and no mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project would add approximately 422,000 net new square feet of warehouse uses and thus would not be adding enough employment to the area to require the construction or expansion of recreational facilities. Therefore, no impact would occur and no mitigation is required.

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. Would the project 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?	☐	☐	☐	☒

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

Roadway Circulation System

Less than Significant Impact. The Los Angeles Department of Transportation (DOT) prepared a letter dated August 5, 2021 reviewing the Transportation Assessment prepared for the proposed warehouse project. The trip generation for this project was calculated in terms of Passenger Car Equivalent (PCE) trips. Overall, the proposed project will generate 242 a.m. peak hour PCE trips and 254 p.m. peak hour PCE trips. However, the project is estimated to generate an approximate net increase of 59 PCE trips during the a.m. peak hour and a net increase of 81 PCE trips during the p.m. peak hour with the consideration of the existing use credit. DOT found that the project will increase the number of daily trips for the site by 151 trips per day with a net increase in daily VMT of 2,623. Based on the trip count, the net Daily Vehicle Trips (DVT) does not exceed the net 250 daily DVT threshold; therefore, this project does not require an analysis under CEQA. DOT determined the project impacts would be less than significant.

Additionally, DOT reviewed the queuing analysis prepared for the three I-5 Freeway off-ramps along Roxford Street. No queuing deficiencies are forecast to occur at the three freeway off-ramps locations for the project's opening year 2024 With Project conditions. DOT found that there is adequate storage lengths on the off-ramps so that the I-5 Freeway mainline traffic flow will not be impacted by off-ramp queues. Therefore, the project would not conflict with a program, plan, ordinance or policy addressing the vehicular circulation system and the project impacts would be less than significant.

Transit, Roadway, Bicycle and Pedestrian Facilities

No Impact. The proposed project is occurring on private property and will not conflict with any program, plan, ordinance, or policy related to transit, bicycle or pedestrian facilities. The project is adjacent to transit and does not impede any exiting or future transit systems. The project provides bicycle parking as is required by Ordinance. The project would not impede construction of future bicycle facilities within the public right of ways adjacent to the project. The project provides adequate sideways and pedestrian access to the site. Therefore, no impact will occur and no mitigation is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Would vehicle miles traveled exceed an applicable threshold of significance?)

Less than Significant. Pursuant to CEQA Guidelines section 15064.3, subdivision (b), a significant impact to the transportation system may occur if the project causes an increase Vehicle Miles Traveled (VMT) that surpasses Los Angeles Department of Transportation's (DOT) established traffic impact criteria. The trip generation for this project was calculated in terms of Passenger Car Equivalent (PCE) trips. Overall, the proposed project will generate 242 a.m. peak hour PCE trips and 254 p.m. peak hour PCE trips. However, the project is estimated to generate an approximate net increase of 59 PCE trips during the a.m. peak hour and a net increase of 81 PCE trips during the p.m. peak hour with the consideration of the existing use credit. The project will increase the number of daily trips for the site by 151 trips per day with a net increase in daily VMT of 2,623. Based on the trip count, the net Daily Vehicle Trips (DVT) does not exceed the net 250 daily DVT threshold; therefore, this project does not require an analysis under CEQA. DOT determined the project impacts would be less than significant.

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

No Impact. A significant impact could occur if a project were to include new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if access or other features were designed in such a way as to create hazard conditions. The Project Site is currently developed with a one-story warehouse. Two new warehouse buildings approximately 589,000 square feet are proposed for construction. No changes are proposed to the surrounding road system. The project would include four curb cut for egress/ingress for trucks and vehicles access and would not include unusual design features. Adherence to all emergency response plan requirements set forth by the City and LAFD would be required through the duration of the project's construction and operation phases. There would be no impacts regarding hazards due to a design feature.

d) Result in inadequate emergency access?

No Impact. A significant impact would occur if the Proposed Project would result in inadequate emergency access. The project does not propose any changes to emergency access and will require approval of plans by the Fire Department. Further, the project must comply with all applicable City fire safety regulations. No impact will occur, and no mitigation is required.

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	☐	☐	☐	☒
a. 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.	☐	☒	☐	☐

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)?

No Impact. The Project Site has not been 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). Therefore, no impact will result and no mitigation is required.

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?

Less than Significant with Mitigation Measure. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an ND, MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on February 4, 2022.

The Gabrieleno Band of Mission Indians – Kizh Nation requested to engage in tribal consultation and a meeting was scheduled for April 14, 2022. On April 6, 2022, a request was received to reschedule the meeting to April 14, 2022. On April 13, 2022, a request was received to cancel the meeting and the Gabrieleno Band of Mission Indians – Kizh Nation stated that they would like to

defer the project to Donna Yocum with the San Fernando Band of Mission Indians. The Department did not receive any communication from Donna Yocum. A tribal consultation conclusion letter was emailed to the Gabrieleno Band of Mission Indians – Kizh Nation on April 29, 2022.

On March 3, 2022, Fernandeño Tataviam Band of Mission Indians (FTBMI) requested to engage in tribal consultation. The first meeting was on March 16, 2022, and Jairo Avila shared an oral testimony about general concerns with the subject site and the immediate area due to resources found near the site. Mr. Avila requested a follow up meeting following staff's receipt of the Sacred Land Files search report. On April 13, 2022, an email was received an email stating that the Cultural Resources Management Division of the Fernandeño Tataviam Band of Mission Indians has completed an assessment referencing archaeological records and traditional cultural knowledge, project plans, and the October 2020 geotechnical assessment. The FTBMI recognizes the project area to be culturally significant and sensitive for tribal cultural resources (TCRs). This is due to the extensive prehistoric-historic tribal use of the area and features associated with the San Fernando Mission. The letter included several tribal cultural resources mitigation measures. The City reviewed the suggested mitigation measures. On May 10, 2022, the City emailed FTBMI a letter with City mitigation measure languages addressing the suggested mitigation measures by FTBMI. On May 12, 2022, FTBMI responded to the suggested mitigation measures language is acceptable with a minor clarification to develop a Treatment and Disposition Plan once a significant resource is encountered. Staff incorporated all requested changes into the mitigation measure language.

No other responses were received from any tribes during the 30-day period.

Based on the results of the records searches dated May 16, 2022 (i.e., Native American Heritage Commission) conducted for the Project Site (included in Appendix M of this Initial Study/MND) demonstrate that there is a record or evidence of tribal cultural resources on the Project Site or the immediately surrounding area.

Thus, based on the results of the Sacred Land Report and consultation with the FTBMI, substantial evidence was provided demonstrating impacts related to tribal cultural resources will be less than significant with mitigations.

MM-TRIBAL-1. Tribal Monitor

Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Fernandeno Tataviam Band of Mission Indians. Any qualified archaeological monitor(s) shall be approved by the Department of City Planning. The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the

ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, 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 Office of Historic Resources (OHR).
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the

Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. 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 and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

MM-Tribal-2. Treatment and Disposition Plan

If significant pre-contact and/or post-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered, and avoidance cannot be ensured, a Treatment and Disposition Plan (TDP) shall be prepared by the Applicant, or its successor, in consultation with the Fernandeño Tatavian Band of Mission Indians prior to the commencement of any all and ground-disturbing activities for the project, including any archaeological testing. The TDP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. Inadvertent discovery of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Tribe(s), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

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?

<u>Less Than Significant Impact.</u>

Water

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. Therefore, impacts related to wastewater treatment would be less than significant.

The project will be served by the City's sewer system and is not expected to exceed wastewater treatment requirements in the area. Impacts will be less than significant.

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas and telecommunications services. The Project would develop two new warehouse buildings. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for services. New connections would be established for the Project; however, no substantial additional infrastructure would need to be installed or relocated to provide electric power facilities, natural gas facilities, or telecommunication services.

Furthermore, the Project Applicant shall be required to implement applicable building code and LA Green Building Code requirements that would further reduce demand for water, wastewater and energy services. Based on the above, potential impacts of the Project would be less than significant, and no mitigation measures are required.

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. A significant impact would occur if the Proposed Project would increase water consumption 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. Accordingly, the increase in employees at the site resulting from the Proposed Project would not be considered substantial in consideration of anticipated growth. The net increase of approximately 422,000 square feet of floor area for two warehouse buildings resulting from implementation of the Proposed Project 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 2010 Urban Water Management Plan. Thus, it is anticipated that the Proposed Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet project demands. 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. Therefore, the Proposed Project would have a less-than-significant impact related to water or wastewater infrastructure and no mitigation is required.

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. The project will be served by the City's sewer system and is not expected to exceed wastewater treatment requirements in the area. Impacts will be less than significant and no mitigation is required.

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?

Less Than Significant Impact. The proposed new warehouse buildings will be required to comply with current regulations required by the Department of Building and Safety (L.A.M.C. Section 99.04.408.1) and the Bureau of Sanitation (L.A.M.C. Section 66.32), which requires the recycling and proper disposal of solid waste. Impacts will be less than significant and no mitigation is required.

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

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. These regulations include:

- California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. These efforts have included permitting procedures for waste haulers and handlers.
- California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), which requires local jurisdictions to adopt an ordinance requiring commercial buildings to provide an adequate storage area for the collection and removal of recyclable materials. The City of Los Angeles passed such an ordinance in 1997.
- AB 341 of 2012 requires businesses to arrange for recycling services.
- Los Angeles Green Code incorporates the CALGreen Code and is applicable to the construction of new buildings by addressing construction waste reduction, disposal, and recycling.
- Los Angeles Citywide Construction and Demolition Waste Recycling Ordinance requires haulers and contractors responsible for handling C&D waste to obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste, and C&D waste can only be taken to City-certified C&D processing facilities.

The proposed industrial project must comply with federal, state, and local statutes and regulations relating to solid waste. Impacts will therefore be less than significant.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur, and no mitigation is required.

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. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur and no mitigation is required.

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. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards. As such, no impacts would occur and no mitigation is required.

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. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, as previously discussed, the Project Site is not susceptible to potential flooding or landslide, nor would the Project result in potential drainage changes. As such, no impacts would occur and no mitigation is required.

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 Impact. Based on the analysis of this Initial Study, the Proposed Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project is occurring in an urbanized area on a presently industrially zoned site that is developed with a warehouse building. There is not significant wildlife or animal or plant communities on the site. Therefore, the impact is less than significant and no mitigation is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of 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 related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. Although projects may be constructed in the project vicinity, the cumulative impacts to which the Proposed Project would contribute would be less than significant. None of these potential impacts are considered cumulatively considerable. Impacts will be less than significant and no mitigation is required.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. No significant impacts were identified. The Proposed Project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly. No mitigation is required.