AMENDED 2019 CEQA FINDINGS ~~FINDINGS OF FACT (CEQA)~~
(2019 amendments reflected in redline. All other language remains unchanged from 2017 adoption of findings)

I. Introduction

The applicant, Tony Yu of Pima Alameda Partners, L.L.C., (the "project applicant" or "applicant") proposes to develop a 12.9 acre property located at 4051 S. Alameda Street (the "project site" or "site"), with an industrial park project. Additional addresses for the site include 1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street. The site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. In relation to major highways, the site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The site is rectangular in shape and is transected by a paved road (East 40th Place) through the central portion in an east-west direction. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. The project involves the vacation of two alleys and a street (40th Place) that run east-west through the site. These requests have been made and tentatively approved in conjunction with the related Preliminary Parcel Map project. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon. The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

To evaluate the environmental impacts of the project in accordance with the California Environmental Quality Act ("CEQA"), the City of Los Angeles ("City") prepared a Draft Environmental Impact Report ("Draft EIR" or "DEIR"). The project, as proposed in the Draft EIR, would consist of the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of

a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. Collectively, these improvements are referred to herein as the project. The Draft EIR additionally considered a No Project alternative and as well as two operational alternatives to the same built project. The "No project" alternative also included a brief description of two project alternatives as a community garden and park or other recreational use.

II. Environmental Documentation Background

The project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 30-day period commencing June 17, 2014 and ending July 17, 2014. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Notice of Availability (NOA), which noted the completion of the NOP and Initial Study, was mailed directly to more than 64 interested parties and to 108 property owners and residents within a 500-foot radius of the proposed project site. The NOA of the NOP and Initial Study was also posted on the City's website, at: http://planning.lacity.org/eir/nops/ENV-2012-920-EIR_IS.pdf. The NOP and initial Study document were available for review and posted at the Vernon Branch Library, located approximately 0.9 mile southwest of the proposed project site at 4504 South Central Avenue; the Junipero Serra Library, located approximately 1.9 miles southwest of the proposed project site at 4607 South Main Street; and the Los Angeles Central Library, located approximately 2.9 miles north of the proposed project site at 630 West 5th Street.

The Department of City Planning received seven letters of comment from public agencies and 225 comment letters or emails from members of the public and other interested parties (Appendix II, *Notice of Preparation Comment Letters* and Table i.A-1, *Initial Study Public Agency Comment Matrix).* An Initial Study was prepared to focus the environmental topic areas to be analyzed in the Draft EIR (Appendix III, *Initial Study).* The Initial Study prepared for the proposed project identified the contents of the Draft EIR, based on environmental issue areas anticipated to be potentially subject to significant impacts (Appendix III, *Initial Study).*

The Draft EIR evaluated in detail the potential effects of the project, it also analyzed the effects of a reasonable range of three alternatives to the project, including potential effects of a "No project" alternative. It also included a brief description of two alternatives that were withdrawn as being infeasible. These alternate land use alternatives were a community garden and a park or recreational use. The development of the property for such uses did not meet the basic objectives of the project to the same extent as the proposed project. Given the inconsistency that these alternate land use alternatives would have with the adopted Community Plan and

existing land use designation and zoning, a detailed analysis of such uses was not completed. The Draft EIR for the project (State Clearinghouse No. 2014061030), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was completed and forwarded to the Governor's Office of Planning and Research (OPR), and a Notice of Completion (NOC) was posted at both OPR and the Office of Los Angeles County Clerk on January 22, 2015. Copies of the Draft EIR and Notice of Availability (NOA) were mailed to 350 representatives and interested parties. The Draft EIR was circulated for a 46-day public comment period beginning on January 22, 2015, which closed on March 9, 2015, beyond the 45 days required by CEQA Guidelines Section 15105(a). Although the 46-day comment period closed on March 9, 2015, at 5 p.m., the City received and accepted the submittal of thirteen (13) late letters of comment from individuals and one (1) late letter of comment from a City agency. In total, the City received seven (7) letters of comment from agencies and eight-one (81) letters of comment from individuals and organizations. Copies of the written comments received during the 46-day public review period are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The City released a Final EIR for the project on June 16, 2016, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with implementation of the project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was also made available for review on the City's website. Hard copies of the Final EIR were also made available at four libraries and the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500- foot radius of the project site as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the project was held by the Deputy Advisory Agency on July 6, 2016. **In September 2016, a Letter of Determination was issued certifying the Final EIR, approving Parcel Map No. AA-2012-919-PMLA to permit the subdivision of one 562,314 net-square-foot parcel into four lots and Site Plan Review to allow the development of more than 50,000 net square feet of nonresidential floor area. These actions were appealed; the City Planning Commission (CPC) held a public hearing in November 2016 and denied the appeal and upheld the decision to certify the EIR and approve the Project. The City provides an opportunity for a CEQA appeal of the certification of the EIR to the City Council. This decision by the CPC was appealed to the City Council. In early March 2017, the City Planning and Land Use Management Committee (PLUM), a subcommittee of the City Council, conducted a public hearing on the CEQA appeal and recommended that the City Council deny the appeal, and uphold the CPC's decision to certify the EIR. On March 21, 2017, the City Council conducted a hearing on the CEQA appeal, denied the appeal, and upheld the CPC's decision.**

A lawsuit challenging the City's actions, including certification of the EIR, was filed in April 2017, and a hearing on the writ petition was conducted in August 2018. The court denied all but one of the allegations in the lawsuit and a Peremptory Writ of Mandate (Writ) was issued on January 8, 2019 that required the City to decertify and revise the EIR to include additional cumulative freeway traffic impact analysis in the EIR. The Writ required additional analysis of potential cumulative freeway impacts only. The Writ stated the Project approvals were not found to be in non-compliance with CEQA, as described further below. The approvals were based on portions of the EIR that have not been found to violate CEQA and, for this reason, no remedial action is required unless compliance with the Writ changes or affects such previous approvals. Accordingly, the Partially Recirculated Draft Environmental Impact Report (PRDEIR) was prepared to present the additional cumulative freeway traffic impact analysis required by the Writ. The PRDEIR was circulated for a 46-day review and comment period by the public and other interested parties, agencies, and organizations in accordance with Section 15087 of the CEQA Guidelines.

The PRDEIR was provided to the State Clearinghouse for distribution. The public comment period was also noticed in the Los Angeles Times on March 21, 2019, and as required under CEQA Guidelines § 15088.5, the notice was also sent to all parties who commented on the original EIR, including Caltrans, and all interested parties that requested notices related to the Project. Additionally, the notice was sent to owners/occupants of all properties within a 500 foot radius of the Project site, to the City's standard public agency mailing list, and to the mailing list used for the original EIR, which includes all interested parties that commented on the Notice of Preparation of the original EIR.

In addition, a public Notice of Availability (NOA) of the PRDEIR was published in the Los Angeles Times on March 21, 2019and mailed directly to interested parties requesting the document (in either electronic or hard copy format). Consistent with Section 15088.5(f)(2) of the CEQA Guidelines, the City requested that reviewers limit their comments to the additional analysis of cumulative freeway traffic impacts recirculated for review. This section also states that the City agency need only respond to comments received during the recirculation period that relate to the recirculated cumulative freeway traffic impact analysis. The public review period began on Thursday, March 21, 2019, and ended on Monday, May 6, 2019, a period of 46 days. It should be noted that per the NOA, the cut off for comments was May 6, 2019 at 4:00 p.m.; however, the City received, considered, and responded to additional comments that were submitted past the cut off time. The PRDEIR was also made available for public review on the Department of City Planning's website (http://planning.lacity.org/ [click on "Environmental Review" and then "Draft EIR"]). In addition, copies of the PRDEIR were made available for review during the public review period at three local libraries:

Vernon–Leon H. Washington Jr. Memorial Branch Library
4504 South Central Avenue
Los Angeles, CA 90011
(323) 234-9106
Hours: Mon., 10 a.m.–8 p.m.; Tues., 12:30 p.m.–8 p.m.; Wed., 10 a.m.–8 p.m.; Thurs., 12:30 p.m.–8 p.m.; Fri., 10 a.m.–5:30 p.m.; Sat., 10 a.m.–5:30 p.m.; Sun., Closed

Junipero Serra Branch Library
4607 South Main Street

Los Angeles, CA 90037
(323) 234-1685
Hours: Mon., 10 a.m.–8 p.m.; Tues., 12:30 p.m.–8 p.m.; Wed., 10 a.m.–8 p.m.; Thurs., 12:30 p.m.–8 p.m.; Fri., 10 a.m.–5:30 p.m.; Sat: 10 a.m.–5:30 p.m.; Sun: Closed

Los Angeles Central Library
630 West 5th Street
Los Angeles, CA 90071
(213) 228-7000
Hours: Mon., 10 a.m.–8 p.m.; Tues., 10 a.m.–8 p.m.; Wed., 10 a.m.–8 p.m.; Thurs., 10 a.m.–8 p.m.; Fri., 10 a.m.–5:30 p.m.; Sat., 10 a.m.–5:30 p.m.; Sun: 1 p.m.–5 p.m.

Following the PRDEIR public comment period, the PRFEIR has been prepared and includes responses to the comments submitted.

The City received 97 written comment letters: five from public agencies (including three from state agencies: the Governor's Office of Planning and Research State Clearinghouse, the California Department of Transportation, and the California Department of Toxic Substance Control), one from the City of Los Angeles Waste Water Engineering Division, one from the Los Angeles County Metropolitan Transportation Authority, and 92 from individuals, a majority of which were identical or substantively the same. One comment letter from an individual was received after the comment period closed.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Environmental Review Section, **221 North Figueroa Street, Suite 1350**, ~~**200 North Main Street, Room 750,**~~ Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. Findings Required to be Made by Lead Agency Under CEQA

Section 21081 of the California Public Resources Code and Section 15081 of the CEQA Guidelines require a public agency, prior to approving a project, to identify the project's significant impacts and make one or more of three possible findings for each of the significant impacts.

The three possible findings are:

A. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR (CEQA Finding 1).

B. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (CEQA Finding 2).

C. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR (CEQA Finding 3).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set forth therein. Section 15091 of the CEQA Guidelines requires findings to address environmental impacts that an EIR identifies as "significant." For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact.

2. Project Design Features – Reference to the identified Project Design Features that are a part of the project (numbering of the features corresponds to the numbering in the Draft EIR)

3. Regulatory Compliance Measures – Reference to the Identified Regulatory Compliance Measures that are a part of the project (numbering of the measures corresponds to the number in the Draft EIR)

4. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures correspond to the Mitigation Monitoring and Reporting Program, which is included as Section IV of the Final EIR).

5. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.

6. Rationale for Finding – A summary of the reasons for the finding(s).

7. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

IV. Description of the Project

A. Project Location and Surrounding Uses

The project site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. The site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. Adjacent land uses consist of a recycling yard and Industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

B. Existing Conditions

1. Site Improvements

The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

2. Land Use and Zoning Designation

The project site is zoned M2-2 located within the Southeast Los Angeles Community Plan area, with a Light Manufacturing land use designation that corresponds to the MR2 and M2 Zones. The purpose of the M2 zoning classification is to allow for lower-impact industrial uses such as clothing design and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales. Light industry also includes a variety of "neighborhood industrial services" that benefit from the close geographic relationship to customers, wholesalers, and related services. Such uses include animal hospitals and kennels, automobile service and painting, lumber yards and specialty construction materials. The proposed use as a light industrial park that will contain garment manufacturing and supportive uses is consistent with the Light Manufacturing land use designation and is permitted within its underlying zone.

3. Project Characteristics

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Consistent with the policies

of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5 street widening on the north and 12.5' street widening on the south of South Alameda Street
- 22' street widening on 41 st Street

Pedestrian/vehicular conflicts would be minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip.

V. Environmental Impacts Found to be Less than Significant by the Initial Study

The City Planning Department prepared an Initial Study that is located in Appendix I of the Draft EIR. In accordance with CEQA Guidelines section 15128, the FEIR described categories of potential effects that were not found to be significant and were therefore not discussed in detail in the FEIR. An Initial Study was prepared for the Project in June 2014 and is included as Appendix III in the FEIR. The Initial Study indicates why the Project's potential effects on these issues were determined not to be significant and were therefore eliminated from further consideration in the FEIR. The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed:

- Aesthetics
- Agricultural And Forest Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

A. Aesthetics

The proposed project would not result in impacts to aesthetics in relation to scenic vistas, scenic vistas within a state scenic highway, or degradation of visual character and quality, and the proposed project would result in less than significant impacts to aesthetics in relation to creation of a new source of substantial light or glare.

1. Scenic Vistas

The City of Los Angeles has not designated any scenic vistas within the proposed project area or any area that would be affected by the development of the proposed project area. The nearest unique urban or historic features within the Southeast Los Angeles Community Plan Area (CPA) include Watts Towers (located nearly 5 miles south of the proposed project site) and established historic areas along Central Avenue, north and south of Vernon (located approximately 0.75 mile west of the proposed project site). Existing buildings, trees, and infrastructure shield the proposed project site from view from these unique features.

2. Scenic Resources within a State Scenic Highway

The nearest designated historic parkway is 6 miles of Interstate Route 110 (Arroyo Seco Historic Parkway), located approximately 5 miles north of the proposed project site; the nearest officially designated scenic highway is 55.1 miles of State Route 2 (Angeles Crest Highway), located approximately 15.5 miles to the north of the proposed project site; and the nearest eligible scenic highway is Interstate Route 210 west of its intersection with State Route 134, located approximately 11 miles north of the proposed project site. The proposed project site cannot be viewed from any of these highways, due to distance.

3. Visual Character and Quality

The proposed project would replace the currently vacant and undeveloped approximately 13-acre site in a Light Industrial zone with approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space with subsequent parking lots in 37- to 40- foot-high two-story structures with surface parking. The proposed project would be similar in mass to several existing buildings in the immediate vicinity of the project site but approximately 7 to 27 feet taller than the buildings immediately surrounding the project site. However, the development of the proposed industrial park, the construction of four industrial buildings in an industrial zone, is consistent with the City of Los Angeles Municipal Code, which places no height restrictions or setbacks on industrial development within the M2 Light Industrial zone. The proposed project is consistent with the City of Los Angeles General Plan's aesthetic policies for industrial development in the Southeast Los Angeles CPA, including the design standards established for industrial development in the Urban Design Chapter of the Southeast Los Angeles Community Plan, because the proposed structures are oriented toward the main commercial street (with office space facing 41st Street and Martin Luther King, Jr. Boulevard); a landscape buffer separates the public streets from the parking

lots; pedestrian/vehicular conflicts are minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip; the buildings have been designed with windows, doors, and decorative concrete panels on the surfaces facing the street that address pedestrian scale; trash areas have been enclosed; mechanical roof equipment will be completely screened from view; and the on-site lighting is directed downward to limit the nighttime light and glare that reaches the nearby residential uses. The proposed project is also consistent with the City's policy to achieve adequate compatibility through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses because the proposed project site is not directly adjacent to a residential neighborhood or commercial use and the western facades of the proposed project that will be seen from residences are comprised of decorative concrete panels that provide a pedestrian scale. The proposed project is consistent with the City of Los Angeles General Plan and the City of Los Angeles Municipal Code for a Light Industrial zone in the Southeast Los Angeles CPA. Therefore, there would be no expected significant impacts to aesthetics related to degradation of the existing visual character of the site and its surroundings.

4. Light and Glare

The proposed project has been designed to provide on-site lighting that avoids impacts to aesthetics related to the creation of a new source of substantial fight or glare that would adversely affect daytime or nighttime views in the proposed project area. The proposed project involves the construction of four industrial buildings, all of which contain shielded exterior area lighting wall packs mounted to the face of the building at 29 feet above the finished floor and solar blue reflective glazing in anodized aluminum frames. The exterior lights will contribute to sources of light and the reflective windows have the potential to contribute to a source of glare in the proposed project area. However, the exterior lights on the buildings have been designed to be shielded downward and the windows on the western face of the building have been positioned to the north of the nearest residence to reduce glare to a less than significant level. The proposed project site is currently vacant, with seventeen 24- to 30-foot-high street lamps located on the sidewalk surrounding the site that constitute existing sources of light and glare. The Metro Blue Line (located to the west of the proposed project site) and the Alameda Corridor (located to the east of the proposed project site) provide periodic sources of nighttime light and glare. The proposed project site is located in an urbanized area, and the surrounding light industrial and warehouse uses typically utilize moderate levels of interior and exterior lighting for security, parking, signage, architectural highlighting, and landscaping. The streets in the area are lined with light fixtures for visibility and safety purposes, and the high volume of truck traffic on the streets surrounding the proposed project site contributes to overall ambient lighting levels, especially from Alameda Street. As indicated in the project description, the proposed project has been designed to comply with the goals and policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan for industrial development, which include (1) the installation of on-site lighting along all pedestrian walkways and vehicular access ways and (2) the shielding and directing of on-site lighting onto driveways and walkways, and away from residential uses. The Southeast Los Angeles Community Plan does not specify light and glare restrictions in relation to surrounding industrial uses. In order to be consistent with the policies of the City of Los

Angeles General Plan, the proposed project design provides nighttime lighting for safety and includes nighttime light shielding for the nearest residence.

B. Agriculture and Forest Resources

The proposed project would not result in impacts to agriculture resources in relation to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflicts with existing zoning for agricultural use or a Williamson Act contract; conflicts with existing zoning for forest land or timberland; loss of forestland or conversion of forest land to non-forest use; or other changes that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

1. Agriculture

The proposed project site is not designated as or suitable to be designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The California Department of Conservation (CDC) Farmland Mapping and Monitoring Plan (FMMP) has identified the area as Urban and Built-Up Land at the statewide scale and the area has not been surveyed at the County scale. There are no Farmlands located in or immediately adjacent to the proposed project site. Although the proposed project site was used for urban gardens with individual plots available to the community from circa 1994 to 2006, the site was cleared of that use as a result of a court decision in 2006 upholding sale of the property to the applicant and is currently vacant land with no permanent structures or occupied uses. No agricultural uses or related operations are present within the site or surrounding area. Due to its urban setting, the site area is not included in the FMMP. The nearest agricultural land use zone within the City's jurisdiction is a cemetery located in Boyle Heights at least 2.5 miles east of the proposed project site. The proposed project site and surrounding communities are not enrolled in a Williamson Act contract. The City of Los Angeles Zoning Plan has designated all of the parcels that comprise the proposed project site as M2: Light Industrial for light manufacturing. One parcel within the Southeast Los Angeles Community Plan Area in the neighborhood of Watts is zoned for A1 agriculture, but there are no parcels in the Southeast Los Angeles Community Plan Area currently used for agriculture.

2. Forestry Resources

The proposed project site and adjacent properties have been designated as M1: Limited Industrial, M2: Light Industrial, and M3: Heavy Industrial zones. There are no forest resources located at the property, nor were such resources historically located at the property. The property has been developed since circa 1920 according to the City's Sanborn maps. The site is designated for Light Industrial use and is currently vacant.

C. Biological Resources

The proposed project would not result in impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts; species recognized by the U.S. Fish and Wildlife Service (USFWS) as federal species of concern or by the California Department of Fish and Wildlife (CDFW) as a California Species of Special Concern (SSC); locally important species;

riparian habitat or other sensitive natural communities; federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; movement of any migratory fish or wildlife species or with an established wildlife corridor; conflicts with any local policies or ordinances protecting biological resources; or conflicts with the provisions of any adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Due to the lack of habitats suitable to support species listed as rare, threatened, or endangered, sensitive species, locally important species, as confirmed during a site visit, they have been determined to be absent from the proposed project site. Based on a record search and site visit, there is no riparian habitat or any other state- designated sensitive natural communities on the subject property, and there are no wetlands or other waters of the United States afforded protection pursuant to Section 404 of the Federal Clean Water Act within the subject property. Suitable habitat is not present to support wildlife movement corridors at the proposed project site. The proposed project is consistent with the applicable goals and policies of the Conservation Element of the City of Los Angeles General Plan. The proposed project site is not within the jurisdiction of any adopted or proposed HCP or NCCP.

The proposed project would result in less than significant impacts in relation to impeding the use of native wildlife nursery sites in relation to ground or shrub nesting native birds. The applicant has agreed to remove all vegetation prior to construction during the non-breeding season (generally October 15 to February 15) to ensure that the project site does not provide suitable nesting habitat for birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA). As indicated in the project description, a qualified biologist will conduct a pre-construction nesting bird survey throughout all construction impact areas no more than 3 days prior to the initiation of construction work. If a protected native bird nest is found, all construction disturbance activities within 300 feet of the nest will be delayed until the nest is vacated and juveniles have fledged. If no native protected nesting sites are found, construction will be allowed to proceed.

D. Geology and Soils

The proposed project would not result in impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides; in relation to substantial soil erosion and loss of topsoil; or from being located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The proposed project site is situated on relatively level ground and is not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. According to the California Division of Mines and Geology (CDMG), the site is not situated within a Seismic Hazard Zone. The proposed project intends to cut approximately 3,600 cubic yards of dirt/soil, fill 4,000 cubic yards, and import and additional 400 cubic yards. All dirt/soil disturbed during excavation and grading will remain on the proposed project site. Additionally, the proposed project consists of four warehouse/industrial buildings and subsequent parking lots that will require the entirety of the proposed project site to be paved over with concrete. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems, as sewers are available for wastewater disposal at the proposed project site. Furthermore, wastewater generated by the proposed project

would be treated at the Hyperion Treatment Plant (HTP) located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. The HTP currently supports wastewater from the proposed project site and would continue to do so following the development of the proposed project.

The proposed project would result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction; from being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or from being located on expansive soil creating substantial risks to life or property. The proposed project site is not located within an Alquist-Priolo Special Study Area, a Fault Rupture Study Area, a Liquefiable Area, a Potentially Liquefiable Area, or a State of California designated Seismic Hazard Zone for liquefaction hazards. The peak ground acceleration at the proposed project site is judged to have a 475-year return period and a 10 percent chance of exceedance in 50 years, and the proposed project would be developed in accordance with the requirements of the California Building Code (CBC) and the Uniform Building Code (UBC). Seismic settlement calculations conducted by Sladden Engineering indicate potential total seismic settlement of up to 0.68 inches, which are expected to be less than one-half of the total seismic settlement. Accordingly, risks associated with seismic settlement should be considered low. Subsurface investigations conducted by Sladden Engineering did not encounter groundwater within a depth of 50 feet or less. The materials underlying the proposed project site are determined to have a "very low" expansion potential.

E. Hydrology and Water Quality

The proposed project would not result in impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area, placement of structures (other than housing) within a 100- year flood hazard area, the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow. Mo residential uses are proposed, and the project site is not located within or near a 100-year floodplain, as indicated on the City of Los Angeles Safety Element 100-Year and 500-year Flood Plains delineation map. The project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown by the City of Los Angeles Safety Element inundation and Tsunami Hazard Areas map.

The proposed project site is not located within inundation and tsunami hazard areas delineated in the City of Los Angeles Safety Element. The proposed project would result in less than significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements, groundwater supplies or groundwater recharge, alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site, alteration of existing drainage patterns in a manner that would result in flooding on site or off site, exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff, substantial degradation of water quality.

1. Water Quality Standards and Waste Discharge

The total proposed project site encompasses approximately 13 acres, and therefore, construction activities would be subject to the requirements of a NPDES Permit issued by the Regional Water Quality Control Board (RWQCB). The National Pollutant Discharge Elimination System (NPDES) General Construction Permit requires that all developers of land where construction activities will occur over more than 1 acre (1) develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. The SWPPP typically includes minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (e.g., the minimization of impervious surfaces, treatment of stormwater runoff, etc.). As described in the Initial Study (Appendix III), although the proposed project would result in a less than significant impact with regard to water quality, the project applicant has agreed to incorporate the following design measures to ensure compliance with the City of Los Angeles Green Streets Policy:

- The project shall comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board, U.S. Environmental Protection Agency, and local agencies regarding water quality.

- The project shall implement storm water best management practices (BMPs) to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.

- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

- The legibility of signs and stencils discouraging illegal dumping shall be maintained.

- Materials used on-site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to: a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved and sufficiently impervious to contain leaks and spills and must have a roof awning to minimize collection of storm water within the secondary containment area.

- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department, binding to the owners to post construction maintenance on the

structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan (SUSMP) and/or per manufacturer's instructions.

Compliance with the requirements of the NPDES Permit and the SUSMP would ensure that the construction or operation of the proposed project would not violate any water quality or waste discharge requirements.

2. Groundwater

The proposed project would not require the use of groundwater. The increase of impervious areas resulting from the proposed project could reduce percolation, which could result in a reduction in groundwater recharge. However, compliance with City SUSMP requirements would percolate up to 0.75 inch of captured rainfall over a 24-hour period to provide additional recharge. Thus, the extent to which local groundwater supplies would be substantially depleted would be limited.

3. Drainage Patterns

There are no streams or rivers located in the immediate vicinity of the project site; however, the Los Angeles River is located approximately 1 mile east- northeast of the project site. The project site consists of an approximately 13- acre vacant lot with scattered weeds and grasses. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with the required provisions of the SWPPP would eliminate erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow some percolation and reduction of runoff, and the increase in surface runoff would not be substantial. Under the proposed project, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow for percolation and a reduction of runoff, and the increase in surface runoff would not be substantial.

4. Runoff

Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping would allow for percolation and a reduction of runoff, and water runoff after development would not exceed the capacity of existing or planned drainage systems. In addition, with the implementation of the required SWPPP during construction and the SUSMP during project operation, any potential sources of polluted runoff would be effectively controlled. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Additionally, as described above, the proposed project has been refined to meet the City of Los

Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

5. Water Quality

Project construction would occur in accordance with standard procedures established by the RWQCB. Project compliance with the City's SUSMP requirements would minimize potential water quality impacts during project operations. Furthermore, as described by Design Measures 60 through 65, the proposed project would require BMPs to minimize run-on and runoff of storm water and the potential for material spills to be transported to the storm water conveyance system. Additionally, as described in the Project Description of this Draft EIR, the proposed project has been refined to meet the City of Los Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

F. Mineral Resources

The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource and in relation to the loss of availability of a locally important mineral resource recovery site. No mineral extraction operations currently occur or have occurred on the proposed project site, and there are no active or abandoned mines or oil fields in the vicinity of the proposed project. Based on a review of the California Geological Survey (CGS), the proposed project is located within an Mineral Recovery Zone (MRZ)-2 zone. However, the property is designated for light industrial use in the Framework Element of the City General Plan. The property and much of the area in the vicinity of the proposed project was developed as industrial prior to the MRZ classification system, thus these properties are not available for commercial mining activities. Furthermore, the proposed project, as currently proposed, will not result in a loss of soil at the proposed project site, and therefore, potential mineral resources will not be disturbed. Cut and fill is proposed to be balanced on-site; therefore, there will be no net loss of sand and gravel resources from the property as a result of construction. According to the Conservation Element of the City's General Plan, sites that contain potentially significant sand and gravel deposits, which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. The proposed property and much of the area in the vicinity of the proposed project was developed as an industrial area prior to the MRZ classification system, thus these properties are not available for commercial mining activities.

G. Noise

The proposed project would not result in impacts to noise in relation to public airports or private airstrips. There are no public airports or public use airports or private airstrips located within a 2-mile radius of the proposed project site. The proposed project would result in less than significant impacts to noise in relation to noise- related exposure or generation of noise levels in excess of established standards from the proposed project, generation of excessive ground-borne vibration or ground- borne noise, permanent increases in ambient noise levels as a result of operation of the proposed project, or temporary or periodic increases in ambient noise levels from the proposed project.

1. Construction Noise

During construction of the proposed project, sensitive receptors will be exposed to noise levels above the thresholds set forth in the City's CEQA Threshold Guide, which states that a project would have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibel (dBA) or more at a sensitive receptor. In order to ensure compliance with the City's existing noise regulation, the applicant has committed to use temporary noise barriers during outdoor construction activities. The temporary noise barrier shall be installed at the western boundary of the proposed project site, along Long Beach Avenue (Figure III.B-3, Temporary Noise Barrier). As demonstrated in the noise analysis conducted in support of the Initial Study, the use of temporary noise barriers during construction is sufficient to ensure compliance with the City Noise Ordinance. (See also Appendix IS-1, Noise Technical Report, to the Initial Study, which is Appendix III of this Draft EIR.) However, with the incorporation of a temporary noise barrier along the western boundary of the proposed project site as a project design element, the proposed project would not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus would be in compliance with the City's noise regulation.

2. Operational Noise

The proposed project's ongoing operation would require building mechanical equipment to ventilate the indoor air quality and provide power for everyday operations. Typical mechanical equipment would include HVAC systems, transformers, and elevators. The proposed project's mechanical equipment would be designed to comply with the City's Noise Regulation requirements and a significance threshold of 5 dBA above the ambient noise levels. The greatest noise level generated by typical building equipment at a distance of 50 feet is 61 dBA, which is well below the significance threshold of 73.3 dBA. Furthermore, noise generated from mechanical equipment is generally absorbed and or sheltered by on-site structures and buildings, further reducing noise levels. Considering that the nearest sensitive receptor is 153 feet away from the proposed project site, operational noise impacts associated with mechanical equipment would be less than significant. The proposed surface parking lot on the proposed project site would generate some noise during operation of the proposed project. Potentially audible sources of noise from the surface parking lot would include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. These sources typically range from about 30 to 66 dBA and are generally short-term and intermittent. The greatest potential noise level generated by typical parking lot sources at a distance of 50 feet is 66 dBA, which is below the significance threshold of 78.3 dBA.

H. Population and Housing

The proposed project would not result in impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, or in relation to displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. There is no existing housing or housing being currently constructed within the currently vacant site; therefore, there will be no displacement of housing necessitating the construction of

replacement housing. The unemployment rate is approximately 13 percent; therefore, there is sufficient local labor to satisfy employment; therefore, the proposed project would not generate a demand for additional housing in the vicinity of the proposed project. There are no people currently residing on the proposed project property. The proposed project property consists of a vacant site. The proposed project site is zoned for light industrial use and the proposed project is an industrial park that does not involve displacement of housing or people.

The proposed project would result in less than significant impacts to population and housing in relation to inducing substantial direct or indireci population growth. The proposed project will facilitate the transfer of 580 jobs from existing nearby locations and the addition of 410 jobs and is, therefore, consistent with the City of Los Angeles' intent to provide industrial job opportunities for residents through the development of a new' industrial park. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences within the Community Employment Area, a 3-mile radius of the proposed project site, with priority given to qualified individuals that reside within one mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The project applicant has also entered into a local hire agreement for the operational phase of the project. Fifty-two percent of the four companies' employees will live within a 3-mile radius of the proposed project site. The Southeast Los Angeles Community Plan, a part of the Land Use Element of the City of Los Angeles General Plan, and the City of Los Angeles Zoning Code have designated the proposed project site as light industrial land use (Zone "M2-2") and the proposed project would involve the construction of an industrial park consisting of four new buildings for warehouse and manufacturing space, parking lots for each building, and utilities. The proposed project is consistent with the City of Los Angeles General Plan's policies for industrial development in the Southeast Los Angeles CPA.

I. Public Services

The proposed project would not result in impacts to public services in relation to schools, parks, and other public facilities.

1. Schools, Parks, Libraries, and Hospitals

The proposed industrial park is a nonresidential use and would therefore not directly generate school-age children. The proposed project is an industrial park consisting of warehouse space, manufacturing space, office space, and parking lots, and it does not include the construction or expansion of residential use, and would therefore not directly generate an increase in population. It is expected that the new employees would be drawn from the existing labor force in the area pursuant to the Local Hire Agreement between Poetry, Impact, Miss Me, and Active Companies and the Coalition for Responsible Community Development and Los Angeles Job Corps. The proposed project site is vacant and zoned for light industrial use in an industrial area that is not appropriate for a park due to air quality issues. In addition, the project applicant has made a cash contribution to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located. The proposed project would not directly generate any

substantial new demand for public facilities such as schools, parks, libraries, or hospitals because it would not directly generate an increase in population.

2. Fire

The proposed project would result in less than significant impacts to public services in relation to fire protection. Fire services to the proposed project site are provided by the City of Los Angeles Fire Department (LAFD). A significant impact would occur if the project required the construction of LAFD facilities to provide an engine company or truck company to serve the project site. The Los Angeles Municipal Code Section 57.09.07 establishes a maximum response distance from a fire station for an industrial use of 1 mile. Consistent with the requirements of the City General Plan, primary response to the project site would be provided by Fire Station No. 14, located 0.8 mile west of the proposed project site. Secondary responders are also located within close proximity of the project site: Fire Station Mo. 21, located 1.0 mile southwest of the proposed project site; and Fire Station No. 17, located 1.2 miles northeast of the proposed project site. The nearest fire station is Vernon Fire Department Fire Station No. 2, located 0.6 mile east of the proposed project site at 4305 South Santa Fe Avenue, Vernon, California 90058; however, the site is not located within the Vernon Fire Department's jurisdiction, which means the proximity of the station is only relevant in the case of a major fire in which the LAFD may require assistance. Given the location of Fire Station 14 (within 1 mile of the proposed project site) for providing service to the proposed project, fire protection services are determined to be adequate.

3. Police

The proposed project would result in less than significant impacts to public services in relation to police protection. Police protection services to the proposed project site are provided by the City of Los Angeles Police Department (LAPD). The proposed project site is located within the Newton Division, under the jurisdiction of the Central Bureau. The site is served by the Newton Community Police Station, located at 3400 South Central Avenue, Los Angeles, California 90011, 1.3 miles west of the proposed project site address via police vehicle (distance is approximately 1.2 miles west). The crime rate in the Newton Division was 61.7 arrests per 1,000 residents in 2011, compared to 42.4 arrests per 1,000 residents citywide; and the traffic accident rate in the Newton Division was 13.9 accidents per 1,000 residents, compared to 12.0 accidents per 1,000 residents citywide. As described in the project description, the proposed project has been designed to incorporate security provisions including fencing with automatic gates, lighting at night around all four buildings, and full-time security guards to mitigate for the increased security risks. Controlled access to buildings, hired security guards, and illumination of public and semipublic spaces would minimize opportunities for criminal activity, therefore reducing the demands placed upon police protection services. The security elements of the project are consistent with the provisions of the City of Los Angeles General Plan and would not warrant the construction of a new Police Station of Substation.

4. Recreation

The proposed project would not result in impacts to recreation in relation to the increased use of existing neighborhood and regional parks or other recreational facilities that would

contribute to their physical deterioration from the proposed project or as a result of existing recreational facilities or proposed construction or expansion of recreational facilities.

5. Use of Existing Neighborhood and Regional Parks

The impact to recreation related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration from the proposed project was avoided through a cash pledge to support maintenance and improvements to existing parks located in close proximity to the proposed project. The proposed project has the potential to result in an increase in the use of parks due to the new employment associated with the proposed project. The nearest neighborhood park (service radius: half a mile) in the City of Los Angeles to the proposed project site is Central Avenue Jazz Park, located 0.94 mile west of the proposed project site at 4222 Central Avenue, Los Angeles, California 900TI. As no parks are located within a half mile of the proposed project site, the proposed project site is not served by a neighborhood park. However, according to the Southeast Los Angeles Community Plan, the Ross Snyder Recreation Center and Fred Roberts Recreation Center provide neighborhood park services to the Southeast Los Angeles CPA. The Ross Snyder Recreation Center (11 acres) is located approximately 0.3 mile west of the proposed project site at 1501 E 41st St, Los Angeles, California 90011, and provides an artificial turf soccer field, barbecue pits, basketball courts, a baseball diamond, children's play area, picnic tables, seasonal pool, tennis courts, and volleyball courts. Additionally, the Fred Roberts Recreation Center (2.9 acres) is located approximately 0.4 mile south of the proposed project site at 4700 Honduras Street, Los Angeles, California 90011, and provides picnic tables and B-B-Q pits, basketball courts, children's play area, a community room, a soccer field, and volleyball courts.

The two nearest regional parks (larger than 100 acres) to the proposed project site are Elysian Park, located approximately 4.2 miles north of the proposed project site at 835 Academy Rd, Los Angeles, California 90012; and Earvin "Magic" Johnson Recreation Area, located approximately 5.9 miles south of the proposed project site at 905 E El Segundo Blvd, Los Angeles, California 90059.

According to the City of Los Angeles General Plan, the current population is not adequately served by the existing parks within the Southeast Los Angeles CPA, which means that a potential population increase due to the new employment associated with the proposed project would increase the park deficiency in the area. However, there are no anticipated growth-inducing impacts from the proposed project. The proposed project is not expected to significantly increase the population because it will facilitate the transfer of 590 jobs from existing nearby locations and the addition of 420 jobs under a local hire agreement for the construction and operation of the project in which future employees will be hired primarily from residences within the Community Employment Area, within a 3-mile radius of the proposed project site, with priority given to qualified individuals who reside within 1 mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Additionally, the project applicant has agreed to provide the City of Los Angeles Department of Recreation and Parks with the funds (equivalent to the provision of 2.6 acres, calculated in local Quimby fees) to dedicate

park land pursuant to the 2003 settlement agreement regarding the proposed project site, which will allow the City to dedicate a park.

6. Construction or Expansion of Recreational Facilities

The proposed project is an industrial park consisting of warehouse space, manufacturing space, and parking lots, and it does not include the construction or expansion of recreational facilities. The proposed project will be partially supported through transfer of employees from local sites and expansion of employment, and therefore there is no anticipated need to construct or expand the existing recreational facilities that serve the region. The project has committed to a local hire agreement for the construction and operations phases of the project, thus resulting in a commitment that 52 percent of the employment will be composed of individuals who live within a 3-mile radius of the project. In addition, the project applicant has made a cash pledge to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the proposed project is located.

VI. Environmental Impacts Found to be Less than Significant After Mitigation

The City finds that the following environmental impacts identified in the FEIR are potentially significant but can be mitigated to a less than significant level. Other impacts set out below were determined to be less than significant, but were considered in full in the FEIR. The potentially significant impacts and the mitigation measures which will reduce them to a less than significant level are set out in the FEIR and are summarized as follows:

A. Air Quality

1. Potential Impact

As indicated in the FEIR, the proposed Project would have a significant effect on air quality for PM_{10} emissions during construction. Therefore, the proposed Project would have a significant effect on air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

2. Finding

Pursuant to Public Resources Code Section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the significant effect on air quality to a less than significant level.

3. Rationale

Construction Phase

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the proposed project site. Fugitive dust emissions would primarily result from site preparation (i.e., grading) activities, whereas NOx emissions would primarily result from delivery and hauling of construction materials

and equipment, the use of heavy-duty construction equipment, and the construction workers' commute trips to and from the proposed project site. The assessment of construction air quality impacts considers each of these potential sources during each part of the construction phase. Although construction emissions can vary substantially from day to day, depending on the level of activity and the specific type of operation, and the fact that fugitive dust emissions can vary based on the prevailing weather conditions, the analysis considers a worst-case scenario with concurrent use of construction equipment to ensure that impacts are not underestimated.

The daily regional construction emissions for the proposed project were estimated using the CalEEMod, version 2013.2.2, emissions model (Table IV.B-8, Unmitigated Estimated Daily Regional Construction Emissions). The proposed project would have a significant impact on air quality for PM (Particle Matter) 10 emissions during construction. In the absence of mitigation measures, PM10 emissions would exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. All other criteria pollutants are anticipated to be below the SCAQMD significance thresholds.

The SCAQMD has adopted the following criteria for determining consistency with regional plans and the regional AQMP: (1) identifying whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and (2) identifying whether a project would exceed the assumptions utilized in preparing the AQMP.

With respect to the first criteria, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable air quality standards. As discussed in more detail above, the proposed project would result in construction-related PM10 emissions that exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. However, with respect to construction related emissions, these emissions would be temporary in nature, lasting only for the site preparation/grading/excavation phases (approximately 3 months), and would not have a long-term impact on the region's ability to meet state and federal air quality standards. In addition, the proposed project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the proposed project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting SCAQMD rules and regulation, the proposed project's construction activities will be consistent with the goals and objectives of the 2012 Final AQMP to improve air quality in the Basin.

With regard to the second criterion, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. According to the Population and Housing section of the Initial Study prepared for the proposed project (Appendix III), the proposed project will be transferring 580 jobs from existing nearby locations, and adding approximately 400 new jobs, which is consistent with the City's Southeast Los Angeles Community Plan. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences with the Community Employment Area, a 3-mile radius of the proposed project site, with

priority given to qualified individuals that reside within one mile of the proposed project. Therefore, the proposed project is not anticipated to induce substantial population growth in the vicinity of the proposed project site, and would be consistent with both the SCAG and AQMP growth projections.

As was discussed in the Draft EIR, the proposed project's construction emissions from PM10 would exceed the SCAQMD's significance threshold by approximately 5.6 pounds per day. Therefore, the proposed project would have a significant impact to air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

The greatest potential for toxic air contaminant (TAC) emissions during construction would be diesel particulate emissions associated with the use of heavy-duty equipment during construction activities. TAC emissions associated with construction of the proposed project have been analyzed by using the standard health risks assessment methodology to determine "Individual Cancer Risk" of a person continuously exposed to TACs over a 70-year lifetime.

The Office of Environmental Health Hazard Assessment (OEHHA) has developed a methodology for estimating health risks from TAC pollutants such as diesel exhaust from construction equipment. OEHHA has developed a DPM inhalation non-cancer (long-term) reference exposure level (REL) of 5 micrograms per cubic meter (pg/m3). No non-cancer acute (short-term) REL has been established for DPM.

Although a cancer risk factor has been established for DPM, the OEHHA HRA cancer risk factors assume a continuous exposure over a 70-year timeframe. Because the construction schedule estimated that the phases which require the most heavy-duty diesel equipment usage, such as site grading and excavation, would last for a much shorter duration (i.e., approximately 3 months), construction of the proposed project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance document does not recommend an HRA for short-term construction emissions. Therefore, the HRA is not meaningful to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, there would be no residual emissions after construction and no corresponding individual cancer risk. As such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and project-related TAC emissions impacts during construction would be less than significant.

During the proposed project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finished, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113, Architectural Coatings, limits the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. Although these odors could be a source of nuisance to adjacent uses, they are temporary and intermittent in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, impacts associated with objectionable odors during construction would be less than significant.

Operational Phase

Operation and maintenance emissions at the proposed project site are likely to result from energy consumption and on-road mobile sources associated with employee commutes and delivery of manufactured goods. Additionally, operational emissions will be generated from area sources including consumer products that contain solvents, landscaping that uses fuel-powered equipment, and on-site emergency generators.

Operation of the proposed project would not introduce any substantial new on-site sources of air pollution. As is indicated in Table IV.B-9, the proposed project is expected to generate daily emissions of criteria pollutants well below the SCAQMD significance threshold. As such, no mitigation measures related to air quality are required for operation of the proposed project. It is also important to note that the estimated emissions are likely to be higher than actual emissions from the proposed project due to the conservative assumptions used for emission modeling.

Cumulative impacts

SCAQMD's methodological framework was used to assess the proposed project's cumulative impacts. In order to assess cumulative impacts based on the AQMP's forecasts of attainment of ambient air quality standards set forth in the Federal and State Clean Air Acts, this methodological framework takes into account forecasted regional growth projections from SCAG. Cumulative development can affect implementation of the AQMP. The 2012 AQMP was prepared to accommodate growth, to reduce pollutants within the SCAQMD portion of the SCAB, and to minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the SCAB is within the projections for growth identified by SCAG, implementation of the 2012 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant.

Since the proposed project would not induce substantial population growth and would be consistent with the growth projections anticipated by SCAG (as further discussed in the Population and Housing section of the previously prepared Initial Study [Appendix III]), the proposed project would be expected to result in a less than significant cumulative air quality impact in relation to consistency with the AQMP.

However, it was determined that there are 11 projects that could affect the cumulative impact analysis of the proposed project that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a nonattainment area. As discussed above, emissions during construction of the proposed project as analyzed in this Draft EIR would be reduced to below the level of significance with the implementation of mitigation measures MM-1 through MM-7. Therefore, implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

4. Mitigation Measures

Air-1: During the construction phase of the project, the oject applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects v/ith more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for ail parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21 A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide;

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of- way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

5. References

DEIR, at pp. IV.B-1 – IV.B-24; DEIR, Appendix V; FEIR, Response to Comment Nos. E2, E6, E7, E10, E11, E13, E14, E21, E39, E43, E44, E46, E52, E54, E58, E62, E67, E68, E71, E72, E79, E81.

B. Cultural Resources

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on paleontological and archaeological resources during construction.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on paleontological and archaeological resources to a less than significant level.

3. Rationale

Paleontological Resources

The Vertebrate Paleontology section of the Natural History Museum of Los Angeles County performed a paleontological collections records search to locate fossil localities within and in the immediate vicinity of the proposed project site. No fossils localities have been reported within the boundaries of the project site.22 However,

museum records indicated that at least six fossils localities (LACM [Los Angeles County Museum] 1755, LACM 3363, LACM 6204, LACM 7701, LACM 7702, and LACM 7758) yielding vertebrate specimens that have scientific importance have been documented in the vicinity.

The paleontological record search indicated that there were no new paleontological resources and/or unique geological features located within the project area. LACM characterization of the project area suggest that surface grading or shallow excavations in the younger Quaternary deposits typically do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils. Therefore, grading and excavations at depths greater than 5 feet may expose and/or damage potentially significant fossils.

The proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium underlain by older Quaternary Alluvium. The older Quaternary Alluvium deposits have moderate sensitivity for paleontological resources and, therefore, have the potential to reveal important vertebrate fossils that can contribute to the life history of the area. Excavations (at 5 feet or more) may encounter previously undisturbed native soils and may have the potential to encounter paleontological resources within these older deposits. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource (at depths greater than 5 feet), thus requiring the consideration of mitigation measures.

There are no unique geological features currently identified within the proposed project boundary; therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature.

Archaeological Resources

The SCCIC conducted a records search for the project site and adjacent surrounding properties and CRHR/NRHP listed and eligible for listing historic properties.24 Native American coordination was also conducted through the NAHC in 2007 and 2013, which consisted of a Native American Sacred Lands Search to identify Native American burials and/or Native American cultural resources within the proposed project site. No California Historical Landmarks (CHLs) are involved with the project, nor does the proposed project site include any California Points of Historical Interest.

The results of the SCCIC record search indicated that 25 cultural resources studies have been conducted with a 0.5-mile radius of the proposed project (Appendix VI, Addendum to the Cultural Resources Technical Report). Of these,
5 previous studies occurred within the proposed project, and 20 studies are adjacent to the proposed project area. A total of 45 cultural resources have been previously recorded within a 0.5-mile radius of the proposed project area. Five resources (P-19-003069, P-19-003070, P-19- 003889, P-19-186110, and P-19-187085/Mojave Road) have been documented within the project area (Table IV.C-1, Prehistoric and Historic Archaeological Sites Located within the Project Area). One resource, P-19-

187085/Mojave Road, has portions that have been found to be eligible or eligible for listing on the CRHR and/or NRHP. Another resource located adjacent to the proposed project, P-19- 186110/Hobart Station, has been found to be eligible for listing on the CRHR and/or NRHP. Additional analyses of historic maps found that the proposed project area contained historic structures as late as 1928, although none remains today.

In 2007 and 2013, the NAHC was contacted to perform a search of the Sacred Lands Field (SLF) of the project area. The SLF resulted in negative findings for Native American cultural resources within the proposed project area.26 In 2007, SWCA Environmental Consultants conducted a Phase I Pedestrian Survey, which resulted in the discovery of one multicomponent archaeological site consisting of both historic and prehistoric materials. The site was given the designation P-19-003889 by the SCCIC and was formally recorded on State of California Department of Parks and Recreation (DPR) 523 series forms. The field survey recovered a total of 15 diagnostic and/or noteworthy artifacts located at 12 different locations on the surface of the project. Of these, 11 artifacts were classified as historic, 1 as prehistoric, 1 as modern, and 2 as pestles of undetermined age.

The record search results indicate the presence of previously recorded buried archaeological features (below 1 meter) adjacent to the project area (ex. privy). Phase II testing conducted in the project area in 2007, within the project area, represents a limited sample; therefore, archaeological materials and/or features could be present. Therefore, there remains a possibility that buried archaeological materials or intact features from P-19-003889 could be present.

The proposed project has the potential to result in significant impacts to cultural resources related to a substantial adverse change in the significance of prehistoric or historic archeological resources. Previous subsurface testing within the project area and adjacent to the project identified the presence of historic period archaeological materials and features. Although the findings within the project area were not considered eligible or unique archaeological resources, the testing only sampled the project area; therefore, the potential remains for previously undiscovered buried archaeological resources to be present within the project area. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique archaeological resource below the surface, therefore requiring the consideration of mitigation measures.

Historical Resources

There are no identified historical resources present within the proposed project. One resource, P-19- 187085/Mojave Road, has been noted to pass through the proposed project; however, no evidence of the road currently exists. SWCA Environmental Consultants conducted a Phase II Testing program of P-19 003889. The testing program involved the placement of 10 shovel test pits (STPs) in a grid pattern throughout the project area to depths ranging from 20 to 90 centimeters below the surface. Nine of the 10 STPs contained cultural materials, which consisted entirely of historic period artifacts. No prehistoric artifacts were observed within the 10 STPs. The historic materials recovered at P-19-003889 did not identify any intact subsurface

cultural deposits or features; therefore, the site is not recommended eligible for listing under any criteria for the CRHR (CEQA Section 15064.5(a)(3)(A-D)) and as such is not considered significant under CEQA. Therefore, the proposed project would have less than significant effects with respect to historical resources.

Human Remains

Reviews of historic maps, along with the results of the records search with the NAHC, indicate that there are no known Native American or historic period cemeteries, nor known informal Native American burials, within the proposed project site. The NAHC was requested to conduct an updated search from their Sacred Lands File for the presence of Native American sacred sites or human remains within the project study area. A written response was received by Sapphos Environmental, Inc. on December 30, 2013,27 indicating that the SLF failed to identify the presence of Native American sacred lands or traditional cultural properties within the project area.

The proposed project is not expected to directly or indirectly disturb human remains, including those interred outside of formal cemeteries. There are no formal cemeteries on the property. The results of the archaeological record search, review of historic maps, and the NAHC SLF search,28 indicate that no historic period or Native American burial grounds are located within the proposed project site. Although there are no known burial sites within the proposed project site, the discovery of human remains is always a possibility. Should human remains be encountered as a result of project related activities, the project will be subject to Section 7050.5 of the Health and Safety Code. In this event, the Los Angeles County Coroner will be notified within 24 hours of the discovery of human remains, excavation in the area of the remains will be halted, the Coroner will determine the nature of the human remains as archaeological or modern, and if the human remains are identified as prehistoric Native American, the Coroner will contact the NAHC and provide notification of the discovery of Native American human remains. Therefore, the proposed project would not result in impacts to cultural resources relating to the disturbance of human remains, including those interred outside of formal cemeteries.

Cumulative Impacts

The incremental impact of the proposed project on paleontological resources, archaeological resources, historical resources, and human remains would be less than significant. There are no expected impacts to paleontological resources, as mitigation measures are required to reduce impacts to the older Quaternary Alluvium deposits present at the proposed project site to below the level of significance. There are no unique geological features on the proposed project site; therefore, there would be no expected impacts related to the destruction of a unique geologic feature. The potential to yield archaeological resources exists on the proposed project site, which constitutes a significant impact requiring the consideration of mitigation measures. There are no known burial sites within the proposed project site; therefore, there would be no expected impacts related to the disturbance of human remains.

4. Mitigation Measures

Cultural-1: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed Project shall be reduced to below the level of significance through the

salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cuitural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground- disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- Paleontological Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or farther and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data. All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data

and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Cultural-2: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

Cultural Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of archaeological material, sketches of

recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

5. References

DEIR, at pp. IV.C-1 IV.C-15; DEIR, Appendix III/Appendix IS-2 and Appendix IS-3; DEIR, Appendix VI.

C. Greenhouse Gas Emissions

1. Potential Impact

The Project will have a less than significant effect on greenhouse gas emissions.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project's global climate change impacts were analyzed quantitatively considering the construction and operational scenario, size, and location of the proposed project. To quantify the amount of GHG emissions contributed by construction and operation of the proposed project, the CalEEMod emissions model and the California Climate Action Registry's General Reporting Protocol were used. The proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project conflicts with the goal of reducing California's GHG emissions to the 1990 levels (427 million metric tons C02e, which is equivalent to approximately 10 tons C02e per capita) by 2020 as required by AB32. Additionally, based on the suggested thresholds proposed by the CAPCOA, the proposed project would be expected to have the potential to result in

significant impacts related to global climate change if the proposed project emits more than 25,000 metric tons of C02e per year.

Based on emissions modeling, unmitigated construction activities would result in the emission of a maximum of approximately 643.22 metric tons of C02e (Table IV.D-3, Unmitigated CO_2 and C02e Emissions). Operation of the proposed project would result in the emission of approximately 2,090.25 metric tons of CO_{20} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 365,945 square feet of warehouse space. The proposed project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO_2e per year, thus not requiring the consideration of mitigation measures.

As a central component of the CEQA Guidelines, there is substantial evidence to support compliance with the Los Angeles Green Building Code (LAGBC) is qualitatively consistent with applicable statewide, regional, and local goals and policies in place for the reduction of GHG emissions. In order to implement the City's Green LA goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC applicable to new development projects. As it relates to new development, the City adopted the LAGBC Ordinance No. 181480, which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City. The proposed project is defined as a "newly constructed nonresidential" pursuant to the LAGBC. The following is a list of mandatory measures within the LAGBC that would have the effect of reducing the project's direct GHG emissions:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent.

- 99.05.210.1. ENERGY STATE Equipment and Appliances. Residential grade equipment and appliances provided and installed shall by ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.

- 99.05.211.4. Prewiring for Future Electrical Solar System: Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.

- 99.05.303.2 Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.

- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

Through implementation of mandatory measures outlined in the LAGBC, the proposed project would be consistent with AB 32, the SCAG RCP, the City of Los Angeles General Plan, and the Los Angeles Climate Action Plan. Therefore, the proposed project would have a less than significant impact on GHG emissions in relation to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.

Cumulative Impacts

It was determined that there are 11 projects that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site (Figure II.B-1, Related Projects, Table III.B-1, Related Projects), but for the purposes of GHG emissions, there are many more projects in the County, the State, and worldwide that would contribute to cumulative global GHG emissions. Due to the fact that the proposed project would be implementing mandatory measures outlined in the LAGBC for "newly constructed nonresidential," the proposed project would be consistent with all applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Additionally, all of the related projects are consistent with the LAGBC guidelines and therefore do not constitute a significant impact on GHG, as they are achieving per capita reductions laid out in the Citywide plan. Furthermore, the proposed project is relocating current operations to a centralized location along the Alameda Corridor with immediate access to rail lines and major interstates and highways, which greatly minimizes mobile emissions that are typical for a project of this type. Therefore, the sizeable percentage of operational GHG emissions associated with the proposed project should not necessarily be considered new emissions attributable to the proposed project because the future employees of the project already generate emissions through their current operations. Thus, when analyzed in conjunction with related past, present, and reasonably foreseeable future projects, the proposed project's cumulative impact in relation to GHG emissions and global climate change is less than significant.

4. Mitigation Measures

As discussed above, the proposed project's construction and operational emissions are not expected to exceed the recommended CARB threshold of 25,000 metric tons of C02e per year. Additionally, with the incorporation of mandatory measures outlined in the LAGBC, the impacts related to GHG emissions would be less than significant, not requiring the consideration of mitigation measures.

5. Level of Significance After Mitigation

There are no significant impacts in regard to greenhouse gas emissions that would require the implementation of mitigation measures.

6. References

DEIR, at pp. IV.D-1 IV.D-13; DEIR, Appendix IV; FEIR Response to Comment Nos. E7, E46, E62, E67.

D. Hazards and Hazardous Materials

1. Potential Impact

The Project will have a less than significant effect on hazards and hazardous materials.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project site is currently vacant, and there is currently no transport, use or disposal of hazardous materials related to the property. The historic uses of the proposed project site that may have involved the transport, use, or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products The proposed project site is currently vacant and there is no expected potential for the release of hazardous materials. The historic uses of the proposed project site that may have involved the transport, use or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products manufacturing. The results of several surface and subsurface investigations conducted at the proposed project site indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) were generally below regulatory limits for commercial land use. Elevated concentrations of certain metals (primarily lead and arsenic) were detected in a limited number of samples, but in no discernible pattern. Based on the analytical results, the available data do not indicate any significant release of contamination to the Property.

An HHSE was performed for the subject property (Appendix VIII). The HHSE was performed to evaluate whether constituents of potential concern (COPCs) were present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future industrial land uses.

Several Phase I and Phase II environmental site investigations have been performed on the subject site from 1995 to 2013. Reports of these investigations were reviewed to develop a conceptual site model, to identify COPCs, and to identify appropriate exposure point concentration estimates for the health screening evaluation. The reports reviewed included:

Phase I Environmental Site Assessment, June 2013. Prepared by SCS Engineers. Soil Vapor Survey, March 2011. Prepared by SCS Engineers. Preliminary Risk Assessment, 31 May 2007. Prepared by PSI. Hexavalent Chromium Analysis, 3 November 2006. Prepared by PSI.
Site Investigation Report – Lancer Site, 29 October 2003. Prepared by Pacific Edge Engineering, inc.
Phase II and Limited Phase III Environmental Site Assessment, 9 October 2006. Prepared by PSI.
Phase I Environmental Site Assessment, 1 September 2006. Prepared by Professional Service Industries, Inc. (PSI).
Phase I/II Environmental Site Assessment, 25 May 2006. Prepared by Advantage Environmental Consultants, LLC.
Preliminary Health Risk Evaluation – Lancer Site, 18 January 1995. Prepared by Hart Crowser, Inc.

Collectively, these reports provide a representative summary of environmental conditions on the subject site.

Based on the HHSE, understanding the regulatory points of departure for risk management, a cumulative cancer risk of 1 * 10~6 indicates that there may be one additional case of cancer for every 1,000,000 people in a population exposed to the COPCs and under the exposure conditions identified in the human health screening evaluation. To put this cancer risk in perspective, the background rate of cancer in the United States is about 1 in 3.16 Therefore, of the roughly 300,000,000 citizens of the United States, 100,000,000 can expect to develop some form of cancer at some time in their lives. If the entire population of the United States were to reside on a site where, due to chemical contamination, the excess lifetime cancer risk was 1 * 10-6, then an additional 300 individuals might develop some form of cancer as a result, and the total number of cancer cases would be 100,000,300. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light industrial warehouse uses to the south and industrial uses and residential areas to the west across Long Beach Avenue. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly west of the proposed project is the Metro commuter light rail line, which separates the industrial zone of the project area with small lot single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity. Given the industrial nature of much of the surrounding area, the presence of hazardous materials is likely on some of the adjoining sites. However, no recognized environmental conditions were observed.

Cumulative Impacts

The proposed project does not create hazards or generate hazardous wastes. It was determined that there are three projects occurring within the vicinity of the proposed project site that are anticipated to be implemented within the construction period of the

proposed project (Table II.B-2, Related Projects). The proposed project does not generate hazards or hazardous wastes. The related projects do not have the potential to generate hazards and hazardous wastes. The related projects are far enough away or do not generate COPCs that would have the potential to contribute to cumulative impacts that would pose a risk or hazard to people or property when evaluated with the related projects.

Because the proposed project does not generate hazards or hazardous wastes, it will not contribute to significant cumulative impacts when added to related past, present, or reasonably foreseeable, probable future projects.

4. Mitigation Measures

None required

5. Level of Significance after Mitigation

There are no significant impacts requiring the consideration of mitigation measures. For seven of the eight thresholds related to hazards and hazardous materials, there are no impacts. With respect to the four CPOCs, there are no anticipated significant impacts, and no mitigation is required. There are no significant and unavoidable impacts related to hazards or hazardous materials.

6. References

DEIR, at pp. IV.E-1 – IV.E-11; DEIR, Appendices VII and VIII; FEIR, Appendices D through N; FEIR, Response to Comment Nos. B2, E7, E10, E11, E46, arid E48.

E. Land Use and Planning

1. Potential Impact

The Project will have a less than significant effect on land use planning.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

As documented in the Initial Study, the proposed project would not result in significant impacts in relation to land use and planning through the physical division of an established community. The proposed project site is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance and is located in an area developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor is located directly to the east of the proposed project site and runs below-grade in the project area. All proposed development associated with the proposed project would

occur within the boundaries of the proposed project site as it currently exists and would not require an alteration of the existing transportation infrastructure. Additionally, the proposed project would not result in the closure of any existing pedestrian routes. The proposed project is located in a manner that is compatible with the existing community and would not cause a physical division within the established community. Therefore, the proposed project would not result in direct, indirect, or cumulative significant impacts to land use and planning in regard to physical division of an established community, and no mitigation measures are required.

The proposed project would not be expected to result in significant impacts to land use and planning in relation to a conflict with adopted or proposed land use plans, policies, or regulations. However, the City of Los Angeles Department of Public Works Bureau of Sanitation has requested that the design of the proposed project be refined to comply with the City of Los Angeles Green Streets Policy, which is still being developed to incorporate green street BMPs into City approved construction details. During the NOP scoping period, the City of Los Angeles Department of Public Works Bureau of Sanitation requested a revision to the proposed project's street plans to meet the City's Green Streets Policy requirements.

As currently proposed, the proposed project consists of four buildings with approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space with associated on site surface parking. The proposed project meets the Southeast Los Angeles Community Plan's minimum requirements for a landscaping buffer and will incorporate the City of Los Angeles' proposed Green Streets policy BMPs in the landscape planters or adjacent sidewalk. The proposed project is located in an area that is almost exclusively developed with light and heavy industrial uses. Additionally, the proposed project is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance, which allows for lower-impact industrial uses such as clothing and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales.

Furthermore, the Southeast Los Angeles Community Plan states that industrial land uses within the Community should be preserved and/or redeveloped to accommodate emerging technologies, thus providing an enhanced job base for the Community's population. Due to the nature of the proposed project, the proposed project would be compliant with the Los Angeles Zoning Ordinance, and consistent with the Southeast Los Angeles Community Plan. Moreover, by developing the proposed project along the Alameda Corridor, the proposed project would be consistent with the RTP and RCP by placing an industrial/warehouse land use along the 20-mile-long rail cargo expressway linking the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles.26, 27 Therefore, the proposed project would not result in significant impacts to land use and planning, and no mitigation measures are required.

As documented in the Initial Study, the proposed project would not result in impacts to land use and planning in relation to a conflict with any applicable habitat conservation plan or natural community conservation plan. The proposed project site is not located within an NCCP designated or proposed for designation by CDFVV. Additionally, the proposed project site is not located within an HCP designated, or proposed for

designation, by USFWS. Therefore, there are no impacts to land use and planning related to a conflict with any adopted habitat conservation plan or natural community conservation plan, and no mitigation measures are required.

Cumulative Impacts

The incremental impacts of the proposed project to land use and planning, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Table II.B-1, Related Projects, would not be expected to be significant. The vacant project site is designated as Light Industrial according to the Southeast Los Angeles Community Plan of the City's General Plan and designated as "M2-2" Light Industrial Zone according to the City of Los Angeles Zoning Ordinance and therefore meets the City's planning objectives within the Alameda Corridor. Therefore, the proposed project would not result in cumulative impacts to land use and planning, and no mitigation measures are required.

4. Mitigation Measures None

required.

5. References

DEIR, at pp. IV.F-1 – IV.F-10; FEIR, Response to Comment Nos. E7, E36, E46, E52, E54, E63, E67, E71, E80.

F Utilities and Service Systems

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on the capacity of the City's sewer system.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on the capacity of the City's sewer system to a less than significant level.

3. Rationale

As a result of letters of comment received by the City of Los Angeles (City) during the scoping period, the City determined that the proposed 4051 South Alameda Street Project (proposed project) may have the potential to result in significant impacts related to utilities and service systems. Therefore, this issue has been carried forward for detailed analysis in this Draft EIR. This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to utilities and service systems as a result of the proposed project.

The potential for the proposed project to result in significant impacts to utilities and service systems at the proposed project site was evaluated with regard to the

jurisdictions and public services provided by the Los Angeles Regional Water Quality Control Board (RWQCB), City of Los Angeles Department of Water and Power (LADWP), Los Angeles Bureau of Sanitation, California Senate Bills (SBs) 610 and 221, California Integrated Waste Management Act, and California Solid Waste Reuse and Recycling Act, based on a construction scenario provided by the construction contractor, a site plan provided by the proposed project applicant, and engineering calculations provided by Gilbert Engineering (Appendix X).

Impact Analysis

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to utilities and service systems.

(a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

The proposed project would result in less than significant impacts to utilities and service systems in relation to exceeding wastewater treatment requirements of the Los Angeles RWQCB. As discussed above, the wastewater from the proposed project would be serviced by HTP, which is located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. HTP has a design capacity of 450 mgd and currently treats an average of 362 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater 5 miles offshore. The remaining capacity of HTP is, therefore, approximately 88 mgd or 19.5 percent of its total capacity. Most of the effluent from HTP is discharged into the Santa Monica Bay through a 5-mile ocean outfall, while approximately 50 mgd of secondary effluent is recycled on-site or transported to the West Basin Municipal Water District Water Recycling Plant for use by local industries.

Considering that more than 75 percent of the proposed project is dedicated to warehouse space (approximately 365,945 square feet) with 17 percent (approximately 85,181 square feet) dedicated to office space and only 8 percent (approximately 29,896 square feet) being dedicated to manufacturing space, the proposed project site would not generate sewer flows that would contain constituents that would jeopardize the ability of HTP to operate within its established wastewater requirements. As with all wastewater treated by HTP, wastewater from the proposed project would be treated according to the treatment requirements enforced by the NPDES permit authorized by the Los Angeles RWQCB. Therefore, the proposed project would not result in significant impacts to utilities and service systems and no further analysis related to exceeding wastewater treatment requirements is warranted.

(b) Would the project require or result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?

The proposed project would not result in impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or

expansion of facilities, causing significant environmental effects. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges. Based on the estimated flows, the Bureau of Sanitation has determined that the sewer system may be adequate. However, additional analysis has indicated that the estimated flow will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 201614 (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and final approval for sewer capacity and connection permit will be made at that time.

Wastewater from Building #1 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under Martin Luther King Jr. Blvd from the north with an expected flow of 53,760 gallons per day (GPD), which is far less than the 198,599 GPD gauged capacity by the City. Also, there are two existing laterals at the 10-inch sewer under Long Beach Avenue, with an expected flow of 25,440 GPD which is far less than the 394,453 GPD gauged capacity by the City. Wastewater from Building #2 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under East 41st Street, with an expected flow of 20,160 GPD, which is far less than the 294,000 to 427,000 GPD gauged capacity by the City. Wastewater from Building #3 would enter the sewer infrastructure from two new laterals under Martin Luther King Jr. Blvd, with an expected flow of 32,640 gallons per day, Wastewater from Building #4 would enter the sewer infrastructure from two new laterals under East 41st Street.

The proposed project area will be serviced by HTP, which has a design capacity of 450 mgd and treats an average of 362 mgd. Furthermore, in November 2006, the Los Angeles City Council approved the Integrated Resources Plan (IRP), which accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP addresses increases in wastewater flows through improvements, additions, and expansions within the HTP service area. These improvements would increase the capacity of the HTP service area to 570 mgd, consisting of HTP's capacity of 450 mgd, TWRP's new capacity of 100 mgd, and LAGWRP's capacity of 20 mgd. 14 As of today, all projects have been completed within treatment plants and sewer lines, and additional ongoing improvements have been proposed in order to continually provide services to meet wastewater needs for the City. Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of

new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects, and no further analysis is warranted.

(c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

The proposed project would result in less than significant impacts to utilities and service systems in relation to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts. As currently proposed, the proposed project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the proposed project would construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. However, the proposed project site would continue to drain into existing City storm drain infrastructure, and runoff from the proposed project site is estimated to be 1.03 cubic feet per second (cfs) and is not expected to exceed the capacity to existing or planned stormwater drainage systems.

Therefore, the proposed project would not result in significant impacts to utilities and service systems, and no further analysis related to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts, is warranted.

(d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

As documented in the Initial Study (Appendix III), there are no impacts from water supplies to accommodate the project's existing entitlements and resources needs. No further analysis is warranted.

(e) Would the project 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 conditions?

As documented in the Initial Study, there are no impacts with wastewater treatment provider's capacity to accommodate the project's demand, and no further analysis is warranted.

(f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

As documented in the Initial Study, there are no impacts with landfill capacity to accommodate the project's solid waste disposal needs, and no further analysis is warranted.

(g) Would the project comply with Federal, State, and Local statutes and regulations related to solid waste?

As documented in the Initial Study, there are no impacts with the project's complying with Federal, State, and Local statues and regulations related to solid waste, and no further analysis is warranted.

4. Mitigation Measures

Utilities-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

5. References

DEIR, at pp. IV.H-1 – IV.H-10; FEIR, at pp. IV-18-IV-20; FEIR, Appendix P; FEIR, Response to Comment Nos. B3, D1, D2, and E46.

6. Level of Significance After Mitigation

Implementation of the proposed project has the potential to result in significant impacts to Utilities and Service Systems. For four of the seven thresholds related to utilities, the analysis contained in the Initial Study determined that there are no impacts. This Draft EIR analysis addressed comments related to demand and capacity related to sewer and storm water for the proposed project site and provides substantial evidence that there are less than significant impacts. However, the City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections, as a means of avoiding impacts to the public sewer system. Implementation of mitigation measure Utilities and Service Sysiems-1 would avoid impacts to the public sewers, and ensure that impacts during operation of the proposed project are reduced to below the level of significance.

VII. Effects that will Remain Significant Despite imposition of ail Feasible Mitigation Measures

The City finds that the following environmental impacts identified in the FEIR are potentially significant. Mitigation has been identified that will reduce the impact to the extent feasible; however, there is no feasible mitigation that will completely eliminate that significant impact. The potentially significant impacts and the mitigation measures which will reduce them to the extent feasible are set out in the FEIR and are summarized as follows:

A. Transportation / Traffic

1. Potential Impacts

The proposed Project would result in significant impacts to transportation and circulation at the intersection of Alameda Street/Washington Boulevard.

2. Finding

Pursuant to CEQA section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate this effect to the extent feasible. Specific economic, legal, social, technological or other considerations, including considerations for the provision of employment opportunities, make infeasible any other mitigation measures or alternatives identified in the FEIR. As explained in Section IV, below, specific overriding economic, legal, social, technological, and other benefits of the Project outweigh this significant effect on the environment.

3. Rationale

In order to assess future operating conditions both with and without the proposed project, existing traffic conditions within the proposed project study area were evaluated. The proposed project site is located approximately one mile to the south of Interstate 10 and approximately 2.15 miles to the east of State Highway 110. Major east-west regional access to the proposed project site is provided by Vernon Avenue, while the major north-south regional access is provided by Alameda Street and Long Beach Avenue. The proposed project would provide four full-access driveways on 41st Street and four full access driveways on Martin Luther King Jr. Boulevard. Table IV.G-1 of the Draft EIR, Access Driveway Conditions, provides a brief description of the existing roadways that comprise the circulation network of the proposed project study area, providing the majority of both regional and local access to the proposed project site.

For the purpose of evaluating existing operating conditions as well as future operating conditions with and without the proposed project, the study area was carefully selected in accordance with local traffic study guidelines. Manual turning movement counts for the selected intersection were collected in the field for the morning and evening peak periods during the month of September 2012. As requested in letters of comment received by the City from Caltrans in response to the scoping notice for the EIR, traffic counts at critical locations were updated in September 2014. The intersections were counted during the peak hours of 7:00 to 10:00 a.m. and 3:00 to 6:00 p.m. It was determined that nine key intersections would be analyzed for the project study area (Figure IV.G- 2, Existing Lane Configurations at Key Intersections):

Alameda Street and 41st Street Alameda
Street and Vernon Street Alameda Street
and 24th Street
Alameda Street and Washington Boulevard Long
Beach Avenue and 41st Street
Long Beach Avenue and Vernon Street Long
Beach Avenue and 24th Street
I-10 Freeway Eastbound Off-ramp and Alameda Street
I-10 Freeway Westbound Off-ramp and Alameda Street

Existing traffic conditions for 2014 were evaluated using the Critical Movement Analysis method (also known as Transportation Research Board's Circular 212 Planning Analysis Method). All the study intersections are currently operating at a Level

of Service (LOS) D or better (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. and p.m. peak hours.

As a response to comments provided by Caltrans during the scoping period for the EIR, the intersections of the I-10 Eastbound and Westbound off-ramps at Alameda Street were included in the analysis. A freeway segment analysis requirement was assessed using Caltrans procedures to determine if freeway segment impact analysis is required for the project. The number of lanes on the I-10 Freeway is five per direction on the east as well as west of Alameda Street. The capacity of a freeway lane is 2,000 vehicles per hour; therefore, the capacity of these freeway segments is 10,000 vehicles per hour for each direction. The existing I-10 Freeway segments in the study area are operating at LOS F. The criteria for impact analysis of a freeway segment are defined as increase in trips by project by 1 percent or more of capacity (i.e., 100 trips) at LOS E or F. As shown in the table, the project will add a maximum of 29 trips to I-10 Freeway traffic volume, less than 100 trips during the peak hours. Therefore, the freeway segment impact analysis per Caltrans methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway segments.

A freeway off-ramp analysis requirement was assessed using Caltrans procedures to determine if freeway off-ramp impact analysis is required for the project. The number of lanes on the I-10 Freeway Eastbound and Westbound Off-Ramp at Alameda Street is two and three, respectively. The capacity of a freeway off-ramp lane is 1,500 vehicles per hour; therefore, the capacity of these freeway off-ramps is 3,000 and 4,500 vehicles per hour, respectively. The criteria for impact analysis of a freeway off-ramp are defined as increase in peak hour trips by project by 1 percent or more of off-ramp capacity at LOS E or F, and 2 percent or more of capacity at LOS D. The existing I-10 Freeway off ramps at Alameda Street are operating at LOS C or better. The impact thresholds are 60 trips at 2 percent of ramp capacity. The project will add 41 total trips to the off-ramps of I-10 Freeway at Alameda Street during the a.m. peak hour, and this off-ramp volume from the project does not exceed the criteria for off-ramp analysis. Therefore, the freeway off-ramp impact analysis per Caltrans methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway off-ramps in the study area.

The proposed project was originally analyzed by the City of Los Angeles Department of Transportation (LADOT) in November 2012. The original analysis was based on the construction of a warehouse facility with four units, each providing 120,000 square feet of gross floor area for a total of 480,000 square feet gross floor area including ancillary office spaces.13 In January 2013, the proposed project was modified to include approximately 17,219 square feet, and the traffic analysis was reviewed by the traffic engineer and updated. The LADOT analysis indicated that there would be no change in the future 2014 LOS of the study intersections as a result of the project. The proposed project was analyzed again by LADOT in October 2013 to address inclusion of 29,896 gross square feet of manufacturing use.

In response to comments received during the scoping period for the EIR, new traffic counts were performed at three of the critical intersections out of the seven original intersections to provide updated data to characterize 2014 baseline conditions and

projected further 2016 baseline conditions (Appendix IX). The three critical intersections were selected for updated counts because of their proximity to the project location. For the remaining intersections, counts were updated by using 1 percent traffic growth rate between 2012 and 2014 per Los Angeles County CMP projections for this area.

Freeway Facilities Analysis

The LADOT entered into an agreement with Caltrans District 7 in October 2013 that requires a focused freeway impact analysis per Caltrans traffic impact studies procedures for all projects that began after October 2013.16 As part of the agreement, the City requires project applicants to work with Caltrans in preparing a freeway impact analysis for land use proposals that meet any of the following criteria:

- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F, based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane). Project impacts are identified for the future year 2016 conditions.

At those intersections operating deficiently (e.g., at a level worse than LOS D) and significantly impacted by the proposed project, a mitigation measure is identified and applied, and a before-and-after mitigation analysis conducted.

The Cumulative Freeway Analysis considers the potential cumulative impacts from the proposed Project and related projects on the freeway system. In accordance with Caltrans' policy to conduct long-term planning for the state highway facilities and be consistent with the Southern California Association of Governments' (SCAG) *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future* (Southern California Association of Governments, April 2012),[1] the analysis includes projections of Year 2035 conditions without and with Project traffic. References to the SCAG *2012–2035 RTP/SCS* were used to be consistent with the prior analysis years.

The Cumulative Freeway Analysis isolates the potential impact of Project traffic on Year 2035 cumulative conditions along Interstate 10 (I-10) at Alameda Street, assuming background traffic growth occurs at an annual rate of 1 percent and considering the traffic generated by the related projects considered in the analysis.

1 Southern California Association of Governments, *The 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (April 2012)*, accessed February 2019, http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf.

The analysis conducted of freeway facilities included four mainline segments of the I-10 freeway (eastbound and westbound segments both east and west of Alameda Street), the two signalized I-10/Alameda Street ramp intersections, and two off-ramp locations:

- **The four freeway mainline segments on I-10 were analyzed using the *Highway Capacity Manual*, 6th edition (HCM),[2] methodology to determine density, speed, and level of service (LOS), consistent with Caltrans District 7 requirements.**

- **The two intersections located at freeway ramps and under partial Caltrans jurisdiction were analyzed using HCM methodology to identify vehicle delay and LOS.**

- **The two freeway off-ramps were analyzed for ramp queue lengths using the Vistro software to estimate queues.**

Impact Analysis

(a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located within the City of Los Angeles and is therefore subject to the California Transportation Plan (CTP), the Regional Transportation Plan (RTP), the City of Los Angeles General Plan, and the Southeast Los Angeles Community Plan. In order to accurately assess future traffic conditions with the proposed project and potential impacts to the applicable plans related to transportation, trip generation estimates were developed for the proposed project. Trip generation rates for the proposed project are based on the nationally recognized recommendations of the Institute of Transportation Engineers (ITE). ITE also provides information on percentage of truck traffic associated with this type of land use. Approximately 20 percent of all vehicular trips generated by a warehouse are designated as truck trips to allow evaluation of a reasonable worst-case scenario. A truck trip is generally equivalent to two (2) passenger car trips on average. Therefore, a 2.0 factor was applied to the number of truck trips to estimate passenger care equivalent (PCE) trips generated by the trucks.

It is calculated that the proposed project will generate approximately 1,966 net PCE trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m.

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2 National Research Council, Transportation Research Board, *Highway Capacity Manual: A Guide for Multimodal Mobility Analysis*, 6th ed. (Washington, DC: Transportation Research Board, 2016).

peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).

While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).

The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, Proposed Project Traffic Conditions for 2016. The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic. However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project (see Section III, Project Description). According to the local hiring terms, an assertive effort will be made such that 20 percent of all hours worked during construction at the proposed project site will be performed by local residents, and 10 percent will be performed by at-risk individuals. It is anticipated that the local hire agreement will reduce the proposed project's impacts to transportation/traffic by enabling employees to commute via public transit, carpooling, bike riding, and walking. Furthermore, the proposed project site is located along the 20-mile Alameda Corridor that links the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles. Through the implementation of the local hire agreement and the location of the proposed project along the Alameda Corridor, the proposed project would be consistent with the CTP, RTP, policies and goals outlined in the City's General Plan, and the Southeast Los Angeles Community Plan, particularly by reducing vehicle miles traveled (VMT) for employees, preserving the Alameda Corridor, promoting transit-oriented development growth, and reducing GHG emissions through public transit and alternative modes of transportation. The proposed project is also adjacent to the Blue Line and other transit facilities which would further reduce employee VMT.

To further ensure consistency with applicable plans, the proposed project is incorporating all recommendations provided by the LADOT for the proposed project as project elements.

Therefore, the results of the traffic analysis in conjunction with the local hire agreement and LADOT recommendations demonstrate that the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to creating a substantial increase in traffic is warranted.

(b) Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures;

or other standards established by the county congestion management agency for designated roads or highways? Exceed, either individually or cumulatively, a level of service (LOS) standard established by the county congestion management agency for designated roads or highways?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable congestion management program (CMP). As was presented in question (a), the proposed project's impact on future traffic conditions would not exceed a LOS D standard or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. Additionally, through the implementation of the local hire agreement, the proposed project would reduce congestion impacts by enabling employees to utilize for other modes of transportation including public transit, carpooling, bike riding, and walking. Therefore, the proposed project would result in less than significant impacts to transportation/traffic, and no further analysis related to conflicting with an applicable CMP.

(c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Initial Study prepared for the proposed project determined that the proposed project would not result in impacts to transportation/traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

(d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would not result in impacts to transportation/traffic in relation to substantially increasing hazards due to a design feature or incompatible uses. In addition to the four buildings, the proposed project includes four full-access driveways on 41 Street and four full-access driveways on Martin Luther King, Jr. Boulevard (see FigureIV.G-1) along with eight loading docks (two per building).

The proposed project would not include any dangerous design features, including sharp or blind curves, dangerous intersections, or any hazardous or incompatible uses. Additionally, the project is not proposing any modifications or crossings of the railroad ROW. There are two at-grade rail crossings in the vicinity of the proposed project. The 41st Street at-grade crossing is located immediately on the west side of the project site, while the 38th Place at-grade crossing is located immediately on the east side of the project site. The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at grade crossing to travel outbound to the west during the p.m. peak hour, while a maximum of seven vehicles will use 38th Place at-grade crossing to travel inbound from the east during the a.m. and p.m. peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project. Additionally, the proposed project is proposing to widen Long Beach Avenue by 12 feet, Martin Luther King Boulevard by 5 feet, and South Alameda Street by 24.5 feet. Therefore, there would be no impacts to transportation/traffic related to substantially increasing hazards due to a design feature, and no further analysis is warranted.

(e) Would the project result in inadequate emergency access?

The proposed project would result in less than significant impacts to transportation/traffic in relation to emergency access. The proposed project area is serviced by the Newton Community Police Station located approximately one mile to the west of the proposed project site at 3400 South Central Avenue, Los Angeles, California 90011. Additionally, the nearest City of Los Angeles Fire Department (LAFD) fire station to the proposed project site is the LAFD Station No. 14 located 0.8 miles northwest at 3401 South Central Avenue. The City of Vernon Station No. 2 is located approximately 0.8 mile to the southeast at 4305

South Santa Fe Avenue, Vernon, California 90058. In addition, there are two other LAFD fire stations within the project vicinity.

Furthermore, the proposed project includes the construction of a 28-foot-wide fire lane that will dissect the proposed project site in a north-south direction to allow emergency access along East Martin Luther King Jr. Boulevard and East 41st Street. Therefore, the proposed project site has adequate emergency access for local police and firefighters. As such, the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to emergency access is warranted.

(f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Initial Study prepared for the proposed project determined that the proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Cumulative Impacts

The updated traffic impact analysis for the proposed project indicates that the proposed project will generate approximately 1,968 net PCE trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour (Appendix IX).20 Although these estimates were developed based on approximately 351 truck trips per day from the proposed project, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR. The results indicate that all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the Volume to Capacity (V/C) ratio due to the project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

It was determined that there are 11 projects within a 2-mile radius of the proposed project site. Of these 11 projects, 5 are located in the direct trip path and near geographic proximity to the proposed project site such that these related projects could affect the cumulative impact analysis of the proposed project within the construction period (Table II.B-1, Related Projects, Figure II.B-1, Related Projects). However, as shown in Table IV.G-7 (Future 2018 Conditions Without Project, which include traffic from related projects, and Future 2016 Conditions With the Proposed Project, which include traffic from related projects as well as the proposed project), the proposed project would be expected to result in a less than

significant cumulative impact in relation to traffic and transportation; and the implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

The updated traffic impact analysis for the proposed Project indicates that with the assumption of 351 daily truck trips for the Project based on the recommendations of the Institute of Transportation Engineers, the proposed Project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour. The level of service (LOS) and volume to capacity (V/C) ratios for the study intersections with related proposed Project traffic and under proposed Project conditions for 2016 indicate that all study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours with the exception of the intersection of Alameda Street and Washington Boulevard, which will operate at LOS E during the p.m. peak hour. Although these estimates were developed based on approximately 351 truck trips per day from the proposed Project, the Project applicant has indicated that truck trips associated with operation of the proposed Project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in the **2017** FEIR. In order to reduce potential impacts, including impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are recommended. However, even with the implementation of recommended mitigation measures, impacts at the intersection of Alameda Street and Washington Boulevard will remain significant during the p.m. peak hour.

Cumulative Freeway Mainline Segment Analysis 2035 - The mainline freeway segment analysis shows that in Year 2035, Project traffic to be added to these freeway segments totals between 6 and 22 Project vehicles per hour compared to the respective Year 2035 traffic levels of between 8,900 and 14,500 vehicles per direction per hour. The change in operating density on the four measured segments is a maximum change of 0.1 vehicles per mile per lane. No change in operating speed will result from adding Project traffic to the four freeway segments. These incremental change in the freeway operating conditions are very small and are not significant.

While the Project would contribute to future Year 2035 cumulative traffic growth on the freeway system, Project traffic would represent 0.2–1.20 percent of the projected growth in traffic volumes, with both traffic from related projects and ambient traffic growth assumed at 1 percent per year on the freeway segments analyzed between (between 2014 and 2035). Project traffic would average 0.66 percent of the new traffic growth on the four freeway segments during the peak periods of the day. Project traffic growth at its highest segment would represent the addition of one car every 15 minutes per lane of freeway, a very small incremental increase not considered significant.

Cumulative Intersection Analysis Year 2035 - The intersection analysis evaluates the two freeway ramp locations on the I-10/Alameda Street

interchange. Caltrans does not have specific criteria to determine the significance of incremental changes in intersection operations. For this reason, the Los Angeles Department of Transportation threshold of significance was used to evaluate these intersections. This threshold identifies an increase in intersection delay of 6.0 seconds at LOS C and 4.0 seconds at LOS D as significant.

The 2035 traffic volumes were developed by increasing the existing traffic volumes with both traffic from related projects and ambient traffic growth assumed at 1 percent per year. The ramp intersections are projected to operate at LOS D or better under all scenarios, regardless of the addition of Project traffic. With an operation of LOS C or D, the incremental increases in delay resulting from the addition of Project traffic would be in the 0.7- to 3.1-second range—below the threshold for significance. Therefore, the addition of Project traffic will not contribute to a significant cumulative impact at these intersections.

Cumulative Off-Ramp Queue Analysis Year 2035 - The queues at the two off-ramps will not extend beyond the available capacity under Future Scenario (Year 2035), without and with the addition of Project traffic. The queue lengths were estimated using Vistro, which reports the 95th percentile queue length, in feet, for each approach lane on the off-ramp. The addition of Project traffic does not substantially increase the off-ramp queue under any of the scenarios tested above (less than one vehicle length during any of the scenarios tested). Therefore, the addition of Project traffic will not contribute to a significant cumulative impact at either ramp location.

As discussed on correspondence received from Caltrans dated April 29, 2019, and May 4, 2019, the City acknowledges that Caltrans' traffic concerns have been addressed, and that Caltrans concurs with the conclusions of the cumulative freeway impact analysis that the Project would not result in a significant cumulative impact on State freeway facilities.

4. Mitigation Measures

As indicated above, all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the V/C ratio due to the proposed project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

The project applicant has identified five mitigation measures to be undertaken during design, construction, and operation of the proposed project to avoid significant impacts related to traffic and circulation.

Since the proposed project's traffic impacts would not be significant at any of the off-site intersections, no off-site mitigation measures would be necessary for the development of this project.

Traffic-1: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Traffic-2: All construction related traffic shall be restricted to off-peak hours.

Traffic-3: ~~41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way.~~
This mitigation was recommended prior to the adoption of the City of Los Angeles' Mobility Element 2035, in which 41st Street was reclassified to a Collector Street. Revised recommendations received from the Bureau of Engineering have been informed by the Mobility Element 2035. Therefore, this mitigation measure has been deleted.

Traffic-4: The Project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces.

Traffic-5: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

5. Level of Significance After Mitigation

Implementation of mitigation measures as included in the determination would reduce impacts to traffic and transportation facilities during construction and operation of the proposed project. However, significant impact would remain at the intersection of Alameda Street/Washington Boulevard in the event that new industrial park resulted in 351 daily truck trips at this location.

6. References

DEIR, at pp. IV.G-1 – IV.G-18; DEIR Appendices IX and XI; FEIR, at pp. IV-14 – IV-18; FEIR, Appendices B and C; FEIR, Response to Comment Nos. B1, B3, E2, E6, E9, E10, E11, E12, E14, E39, E43, E44, E46, E48, E68, E72, E79, E81. **PRDEIR at pp. IV.A-1 – IV.A-19; PRFEIR at pp. II-20 – II-24.**

VIII. Alternatives to the Original Project

To develop project alternatives, the EIR preparers considered the project objectives and the significant impacts identified in Section IV of this Draft EIR, identified those significant impacts that could be substantially avoided or reduced through an alternative, and determined the modifications to the project that would be needed to meet most of the basic objectives of the proposed project and substantially reduce or avoid the significant impacts of the project.

Three alternatives to the Project are identified in the FEIR, which include a No Project Alternative, a Use of Clean Fuel Trucks Alternative, and a Reduced Truck Operations Alternative. Two additional land use alternatives, the Community Garden Alternative and the Park or Recreational Use Alternative, were withdrawn from consideration on the grounds that they are inconsistent with the Project objectives set forth in the FEIR and the objectives and policies of the Southeast Los Angeles Community Plan. Based on an analysis of these alternatives, an environmentally superior alternative was identified. Each of the alternatives has been evaluated in relation to its ability to accomplish the Project objectives.

The objectives of the proposed project are as follows:

- Construct a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing.
- Locate a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- Develop an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- Provide opportunities for the project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project.
- Preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- The Southeast Los Angeles Community Plan Area population stands to benefit from the proposed project due to economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City.

Based on the analysis contained in the FEIR, the Project will result in a significant and unavoidable traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour.

Because significant environmental effects would remain even after application of all feasible mitigation measures, the City must adopt findings on the feasibility of Project alternatives. If there is a feasible alternative to the Project, decision makers must decide whether it is environmentally superior to the Project.

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." State CEQA Guidelines section 15091 adds "legal" considerations as another indicia of feasibility. (See also Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 565.) Project objectives also inform the determination of "feasibility." (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 417.) "'[Fjeasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (jd.; see also Sequoyah Hills Homeowners Assn, v. City of Oakland (1993) 23 Cal.App.4th 704, 715.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (Residents Ad Hoc Stadium Com, v. Board of Trustees (1979) 89 Cal.App.3d 274, 287.)

The three identified alternatives, as well as the two alternate land use alternatives and the identified environmentally superior alternative, are summarized below.

A. **Alternate Land Use Alternative - Community Garden**

These alternatives, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or a park or recreational Use. However, these alternative were withdrawn from consideration for further analysis as it does not meet the basic objectives of the project:

- A community garden would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The Southeast Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1:** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
- **Policy 3-1.1:** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2:** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible, o **Policy 3-2.1:** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands". The Project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Because the Community Garden Alternative does not meet the Project objectives and is inconsistent with the goals and policies of the Southeast Los Angeles Community Plan, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at p. VI-3; FEIR, at pp. IV-21 – IV-22; Response to Comment Nos. E7, E62, E63, and E67.

B. **Alternate Land Use Alternatives – Park or Recreational Use**

This alternative considered development of a portion of the property for an alternate land use, specifically a park or recreational use. However, this alternative was withdrawn from consideration for further analysis, because it is inconsistent with the adopted Community Plan and does not meet the basic objectives of the Project:

- A park or recreational use would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A park or recreational use would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A park or recreational use would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A park or recreational use would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A park or recreational use would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A park or recreational use would not benefit Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1:** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
- **Policy 3-1.1:** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2:** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible,
- **Policy 3-2.1:** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." The Project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Appendix XII and Section III.E of the DEIR provide details of a 2003 settlement agreement between the prior owner of the Project site and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation purposes, and subsequent amendment of the agreement to allow the proposed Project to be developed. This amendment for a cash pledge in lieu of a dedication of a portion of the Project site provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the Project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property. The cash pledge was subsequently utilized to improve recreational facilities at Ross Snyder Park, Fred Roberts Park, and the Pueblo Del Rio housing development.

Because the Community Garden Alternative does not meet the Project objectives, is inconsistent with the goals and policies of the Southeast Los Angeles Community Plan, and has been determined to be inappropriate in an industrial corridor which is isolated to the east and west by major rail lines, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at pp. VI-3 – VI-4; FEIR, at pp. IV-22 IV-24; Response to Comment Nos. E7, E62, E63, and E67.

C. **No Project Alternative**

1. Description of the No Project Alternative

There are no components to the No Project Alternative. Under the No Project Alternative, the proposed Project would not be constructed. The existing conditions at the site would remain unchanged, until a future project is proposed for development consistent with the light manufacturing zoning.

2. Objectives and Feasibility

The No Project Alternative would not meet any of the Project objectives. Leaving the property vacant would also be inconsistent with the light manufacturing land use zoning designation for the property. More importantly, the failure to develop the property for its designated purpose as light manufacturing would be inconsistent with land use planning objectives articulated in the adopted Southeast Los Angeles Community Plan.

- **Objective 3-1:** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy** 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
  - **Policy 3-1.2:** Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.
  - **Policy 3-1.3:** Adequate compatibility should be achieved through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.
- **Objective 3-2:** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1:** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

Under the No Project Alternative, no construction would occur. Therefore, no environmental impacts would occur. There would be no anticipated short-term, long-term, or cumulative impacts.

3. Finding Regarding Feasibility of the No Project Alternative

The No Project Alternative would preclude development on the property, and as a result the Project objectives that have been set forth for the Project would not be met.

Thus, this Alternative was considered but, for the reasons explained above, the City finds that it is infeasible and rejects it on that basis.

References: DEIR, at pp. VI-6 – VI-9; FEIR, at pp. IV-25.

D. **Use of Clean Fuel Trucks Alternative**

1. **Description of the Use of Clean Fuel Trucks Alternative**

This alternative would entail the same construction scenario and level of operation as the proposed Project. The proposed Project was determined to result in significant impacts to air quality requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Truck trips during the operational phase of the Project are the primary contributor to emissions of criteria air pollutants. Therefore, under this alternative, emissions would be reduced by requiring that a mix of conventional and alternative fuel supply and distribution truck be used to decrease emissions by 10 percent.

2. **Objectives and Feasibility**

As with the proposed Project, the Use of Clean Fuel Trucks Alternative is capable of achieving the six basic objectives of the proposed Project. Additionally, the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed project. Like the proposed Project, the Use of Clean Fuel Trucks Alternative would therefore result in significant impacts with regard to traffic and transportation at the intersection of Alameda Street/Washington Boulevard which would operate at LOS E during the p.m. peak hour. Because the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed Project, the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project.

3. **Finding Regarding Feasibility of the Use of Clean Fuel Trucks Alternative**

Because the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project, the City Council finds the Use of Clean Fuel Trucks Alternative to be infeasible and rejects it on that basis.

References: DEIR, at pp. VI-9 – VI-12; FEIR, at pp. IV-25.

E. **Reduced Truck Operations Alternative**

1. **Description of the Reduced Truck Operations Alternative**

The Reduced Truck Operations Alternative would entail the same elements that are described in the proposed Project. This alternative would entail the same construction of a new industrial park consisting of four buildings occupying approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The proposed Project was determined to result in significant traffic impacts requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Under this alternative, the

Applicant voluntarily recommended reducing maximum allowable truck trips per day, during the operational phase of the project, to 75 trips per day. The empirical data for the Applicant's existing operations demonstrates that this is feasible, as the Applicant is currently operating at less than 50 truck trips per day.

2. Objectives and Feasibility

As with the proposed Project, the Reduced Truck Operations Alternative is capable of achieving the six basic objectives of the proposed Project. Under the Reduced Truck Operations Alternative, the significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour would be avoided. Though the Reduced Truck Operations Alternative would have fewer impacts than the Project, there are practical difficulties associated with monitoring and enforcing a restriction on the daily number of truck trips throughout the life of the Project.

3. Findings Regarding Feasibility of the Reduced Truck Operations Alternative

While data demonstrates that the Applicant does not create more than 50 truck trips per day, the imposition of a condition which sets a permanent cap or limit on truck trips of the industrial park limits the potential economic growth and long term viability of the industrial-zoned site. In the event that the new structures remain the same but the nature of the industrial park's operations change or the Applicant's business expands, there would not be an opportunity to revisit a trip cap and reassess the possibility of an adjusted limit.

In addition, an alternative that would limit truck operations presents practical difficulties with respect to long term enforcement following the construction of the industrial park. Both of the project's requested entitlements, a Parcel Map and a Site Plan Review, do not avail themselves with an inherent "plan approval" process that allows the City to revisit compliance with conditions and potentially revoke a grant if a condition is not appropriately followed in perpetuity. This challenge of ongoing monitoring is potentially further complicated in the event that the recorded parcel map is sold to four separate entities in the future.

For these reasons, the City finds the Reduced Truck Operations Alternative to be infeasible and rejects it.

References: DEIR, at pp. VI-12 – VI-15; FEIR, at pp. IV-26 – IV-27.

XI. OTHER CEQA CONSIDERATIONS

A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The EIR analyzes the potential for the project to result in growth-inducing impacts. Such impacts normally occur when a proposed project fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The types of projects normally considered to result in growth-inducing

impacts are those that provide infrastructure suitable to support additional growth or that remove an existing barrier to growth.

The project will not provide infrastructure that would be suitable to support additional growth or that would remove an existing barrier to growth. The project is located in a developed area with permanent roads, utilities, and infrastructure capable of meeting the access, utilities, and service needs of the proposed project. The project is an urban infill project, making better use of capacity in the existing urban infrastructure. Project features and mitigation measures associated with the project will result in localized improvements to address project-related demand for infrastructure, but would not require new access roads, utilities, or infrastructure that might contribute to indirect growth-inducing impacts.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines provide an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. Such a change refers to an irretrievable commitment of nonrenewable resources, such as those used as building materials, or other environmental changes, such as urbanization, that commit future generations to the use of natural resources. Potential irreversible changes including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The project site is currently vacant and is located in an urbanized area of the City of Los Angeles (City) within the Alameda Corridor. Implementation of the project will represent a continued long-term commitment to use of the site. As a result, the project will involve an irreversible commitment to the use of nonrenewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and sand and mineral resources used in construction materials. However, the project will not require a large commitment of any of these resources, and impacts related to this issue will be less than significant.

The project includes development of a new industrial park consisting of four buildings on a site that is currently vacant and is in an urbanized area that is already served by an existing roadway system and utility infrastructure. Implementation of the proposed project would not commit future generations to using the proposed project site for the proposed land uses.

The project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the project will construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. The proposed project would continue to drain into existing City storm drain infrastructure,

and runoff from the proposed project site would not exceed the capacity to existing or planned stormwater drainage systems, and would not cause irreversible environmental damage. Therefore, the proposed project would not result in irreversible damage that could result from environmental accidents.

C. CEQA Considerations

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the **2019 Final** EIR **(which includes the 2017 Final EIR, the 2019 PRDEIR and 2019 PRFEIR)** was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the **2019 Final** EIR for the project, that the Draft EIR and the **2019 PRDEIR** ~~**Recirculated Draft EIR**~~ which was circulated for public review reflected its independent judgment and that the **2019** Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: Aesthetics/Visual Impacts, Air Quality, Geology and Soil (Geotechnical), Greenhouse Gas Emissions, Land Use, Transportation and Circulation, Noise and Vibration, Visual Resources, Light and Glare, Geotechnical, Water Resources, Air Quality, Cultural Resources, Public Services, Utilities, and Population, Housing and Employment. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, Growth Inducing Impacts of the project and Energy. The significant environmental impacts of the project and the alternatives were identified in the **2019 Final** EIR.

3. The City finds that the **2019 Final** EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The **2019** Final EIR was prepared after the review periods and responds to comments made during the public review period.

4. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR **and PRDEIR**. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The **2019** Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR **or PRDEIR**. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the **2019 Final** EIR.

5. The **2019** Final EIR documents changes to the Draft EIR and accordingly provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the ~~**Draft EIR and**~~ **2019** Final EIR and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding

recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR **or PRDEIR**, or that would require preparation of a supplemental or subsequent EIR.

Specifically, the City finds that:

a. The Responses to Comments contained in the **2019** Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

b. The City has thoroughly reviewed the public comments received regarding the project and the **2019** Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

c. None of the information submitted after publication of the **2019** Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the **2019** Final EIR, or feasible a feasible mitigation measure or alterative not included in the **2019** Final EIR.

6. The mitigation measures identified for the original project were included in the Draft EIR and Final EIR. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program ("MMP"). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

7. CEQA requires the Lead Agency approving a project to adopt a Mitigation Monitoring Program ("MMP") or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

9. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

11. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

12. The EIR is a Project EIR for purposes of environmental analysis of the project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions.

13. The City finds that none of the public comments to the Draft EIR **or PRDEIR** or subsequent public comments or other evidence in the record, include or constitute substantial evidence that would require recirculation of the **2019** Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the **2019** Final EIR prior to its certification, and that the **2019** Final EIR need not be recirculated prior to its certification.

IX. Statement of Overriding Considerations

The findings and this Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, the references included in the EIR, the public hearing for the entitlements, and the documents and materials that constitute the record of proceedings.

The EIR has identified a significant and unavoidable impact that would result from the implementation of the proposed project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of the approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. TO adopt a Statement of Overriding Considerations, the decision-maker must balance the economic, legal, social, technologically, or other benefits of a proposed project against its unavoidable environmental risks when determination whether to approve the project. If the specific economic, legal, social,

technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

The City finds that the mitigation measures described in the FEIR will, when implemented, mitigate or substantially lessen all but one of the significant effects identified in the FEIR. A significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour is unavoidable even after incorporation of all feasible mitigation measures due to the volume of trucks that have been assumed to service the Project based on institute of Traffic Engineers projections. For this effect, pursuant to Public Resources Code Section 21081(b) and State CEQA Guidelines sections 15093 and 15043, the City has balanced the benefits of the Project against the unavoidable adverse environmental risk in approving it.

In this regard, the City hereby finds that all feasible mitigation measures identified in the FEIR have been and will be implemented with the Project and that any significant unavoidable effects remaining are acceptable due to the following specific economic, social, and other considerations, including but not limited to Project benefits, based upon the findings set forth above, in the FEIR, and in the public record of the consideration of this Project.

The Project's significant and unavoidable adverse impact is the following:

« Traffic impacts at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour

Accordingly, the City adopts the following Statement of Overriding Considerations, recognizing that a significant and unavoidable impact could potential result from the implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the project described above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons discussed below.

These stated reasons summarize the benefits, goals, and objectives of the proposed project, and provide, in addition to the findings made above, the detailed rationale for the benefits of the project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the project justify adoption of the project and certification of the completed EIR, notwithstanding certain significant and unavoidable impacts. Many of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the project and justify adoption of the project and certification of the completed EIR. In particular, achieving the underlying purpose for the project would be sufficient to override the significant environmental impacts of the project. The City hereby finds that the following social, economic, and planning benefits of the Project outweigh the PM peak hour traffic impact of the Project at the intersection of Washington Boulevard and Alameda Street that would result if 351 truck trips were generated in connection with the operation of the proposed Project.

- The proposed development of the Property for light industrial use will effectuate the goals and policies of the Southeast Los Angeles Community Plan by converting an existing underutilized vacant parcel of land to productive use as a light manufacturing facility on property that is planned and zoned for light industrial use.

- Development of the Project will result in the creation of more than 450 new permanent garment manufacturing jobs. The Project Applicant has entered into a Local Hire Agreement with the Coalition for Responsible Community Development ("CRCD") and the Los Angeles Job Corps, according to which the Applicant will make an assertive effort to hire local residents for at least 50 percent of new employment positions and/or employment positions for which local residents are qualified that become vacant during the term of the agreement. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The Applicant will also pay a one time fee of $250,000 to CRCD and the Los Angeles Job Corps. (FEIR, Appendix O).

- The Project Applicant's general contractor has entered into a Construction Local Hire Agreement with Playa Vista Job Opportunities and Business Services ("PVJOBS") for each of the four new buildings to be developed on the Project site, according to which an assertive effort will be made such that 20 percent of all hours worked in construction will be performed by local residents. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. An assertive effort will also be made such that included within the 20 percent local hire goal, 10 percent of all hours worked in construction will be performed by at-risk individuals, who are described in the agreement as a local resident who lacks a high school diploma or GED, has a history of substance abuse, has a household income below 50 percent of median, is homeless, a welfare recipient, has a history of involvement with the justice system, is chronically unemployed, or a single parent. (FEIR Appendix O).

- Development of the Project will result in improved public infrastructure due to the dedication and widening of the public right-of-way along Alameda Street, 41st Street, and Long Beach Avenue as well as new curbs, gutters, sidewalks, street trees, street lights, and upgraded traffic control devices.

- The development of the Project as proposed will directly result in increased revenues to the City of Los Angeles through increased property taxes based on an increase of approximately $30 million in assessed value upon completion of construction based on approximate construction costs of between $60.00 and
- $65.00 per square foot of floor area, and will indirectly result in increased revenues through increased sales and other use taxes from higher rates of employment in the surrounding community.

Based on the entire record of proceedings, the City finds that the foregoing social, economic, and planning considerations outweigh the significant, unavoidable impact of the Project as identified in the FEIR. The substantial evidence demonstrating the benefits of the Project are found in these findings, and in the documents found in the record of proceedings.

The City further finds that none of the public comments to the Draft EIR or subsequent public comments of other evidence in the record, included or constitute substantial evidence that would

require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be further recirculated prior to its certification.