I. INTRODUCTION/SUMMARY

A. INTRODUCTION

This Partially Recirculated Draft EIR (PRDEIR) provides additional analysis of the potential for cumulative freeway impacts from the proposed 4051 South Alameda Street Project (proposed Project) and related projects. A description of the proposed Project is included in Section III, *Project Description*, of this PRDEIR.

As described in Sections 15121 and 15362 of the State California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations, Section 15000 et seq.), an EIR is an informational document prepared to inform public agency decision makers and the public of the significant environmental effects of a project and identify feasible ways to minimize the significant effects.

This PRDEIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows: An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good-faith effort at full disclosure.

1. Environmental Review Process

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Planning Department is the Lead Agency for the proposed Project. A Notice of Preparation (NOP) was prepared and circulated on June 17, 2014, through July 17, 2014, for the required 30-day public review period to solicit input on the scope and content of the EIR.

The Draft EIR was completed and forwarded to the Governor's Office of Planning and Research (OPR), and a Notice of Completion was posted at both OPR and the Office of Los Angeles County Clerk on January 22, 2015. A Notice of Availability (NOA) of the Draft EIR for public review was advertised in the *Los Angeles Times* newspaper as well as sent via mail to 85 public

agency representatives and 265 interested parties, including private organizations and individuals. The Draft EIR was made available for public review at the City of Los Angeles website for a period of 46 days from January 22, 2015, through March 9, 2015. In addition, copies of the Draft EIR were available during the public review period at three local libraries: the Vernon Branch and Junipero Serra Branch Libraries, and the Los Angeles Central Library.

Although the 46-day public 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 eighty-one (81) letters of comment from individuals and organizations. The City completed the Final EIR, which included responses to these comments, in June 2016.

The City's Deputy Advisory Agency (Advisory Agency) and the Department of City Planning conducted a public hearing in July 2016 to consider the EIR and the Project. 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. 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 proposed Project and recommended that the City Council deny the appeal, approve the proposed Project, and adopt the CPC's decision. On March 21, 2017, the City Council conducted a hearing on the proposed Project, denied the appeal, and adopted the CPC's decision.

A lawsuit challenging the City's actions was filed in April 2017, a hearing on the writ petition was conducted in August 2018, and a Peremptory Writ of Mandate (Writ) was issued on January 8, 2019 that required the City to revise the EIR to include additional cumulative freeway traffic impact analysis in the EIR. The Writ only required additional analysis of potential cumulative freeway impacts. The Writ stated the Project approvals were not found to be in non-compliance with CEQA. 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, this PRDEIR presents the additional cumulative freeway traffic impact analysis required by the Writ.

This PRDEIR is being circulated for a 45-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 to responsible and trustee agencies. In addition, a public NOA of the PRDEIR was published in the *Los Angeles Times* and mailed directly to interested parties requesting the document (in either electronic or hard copy format). The dates of the public review period are Thursday, March 21, 2019, to Monday, May 6, 2019, a period of 46 days. 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 during the public review period for review 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.

All comments or questions on the PRDEIR should be directed to the City Planning Department:

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Los Angeles, CA 90012
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The City will consider comments received on the additional cumulative freeway traffic impact analysis. Following the public review of the PRDEIR, the City will evaluate and respond to comments as provided in Section 15088. A Partially Recirculated Final EIR will be prepared with responses to comments received during the public review period on the cumulative freeway traffic impact analysis.

2. Organization of the PRDEIR

This PRDEIR is organized into six sections:

- **Section I: Introduction/Summary:** This section presents an introduction to the supplemental analysis of cumulative freeway impacts provided in this PRDEIR and a summary of the project description and cumulative freeway traffic impact analysis.
- **Section II: Environmental Setting:** This section presents an overview of the environmental setting of the proposed Project, including existing and surrounding land uses and identification of the related projects considered in the cumulative freeway traffic impact analysis.
- **Section III: Project Description:** This section presents a description of the proposed Project, including location, site characteristics, and Project objectives.
- **Section IV: Environmental Impact Analysis:** This section presents the results of the cumulative freeway traffic impact analysis and other cumulative impacts.

This document incorporates by reference the January 2015 Draft EIR and June 2016 Final EIR prepared for the proposed Project. The additional Cumulative Freeway Analysis presented in this document, together with the January 2015 Draft EIR and June 2016 Final EIR, constitutes the Revised EIR for the proposed Project.

B. SUMMARY

The purpose of the Summary is to provide the reader with a clear and simple description of the proposed Project and the potential for the proposed Project to contribute to cumulative impacts on freeway facilities.

1. Summary of the Project

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 up to 123 parking spaces; Building 2 consists of up to 2 stories that occupy up to approximately 133,680 total square feet and up to 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies up to approximately 116,724 total square feet and up to 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies up to approximately 113,743 total square feet and up to 106 parking spaces. In total, the proposed Project would occupy include 466,120 square feet of warehouse and ancillary 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. 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 one another; 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-foot street widening on Martin Luther King Jr. Boulevard
- 8.5-foot street widening on the north and 12.5-foot street widening on South Alameda Street
- 22-foot street widening on 41st Street

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

The City of Los Angeles Zoning Ordinance designates the proposed Project area as M2-2, Light Industrial Zone.[1] 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 and distribution; biomedical research and 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; and lumber yards and specialty construction materials.

2. Cumulative Freeway Analysis

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 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),[2] the Cumulative Freeway Analysis includes projections of Year 2035 conditions without and with Project traffic.

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.

The analyses 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.

1 City of Los Angeles Municipal Code, ch. 1, art. 2, sec. 12.19.
2 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 four freeway mainline segments on I-10 were analyzed using the *Highway Capacity Manual,* 6th edition (HCM),[3] 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.

Caltrans guidelines do not require the analysis of queues or capacity of freeway on-ramps because the performance of on-ramps is measured by the on-ramp/street intersection capacity calculations and the ramp meters on the ramp itself.

a) 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.

b) 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

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

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.[4]

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.

c) 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.

3. Cumulative Analysis – Other Topics

The January 2015 Draft EIR provided cumulative impact analyses for each environmental topic in Section IV: *Environmental Impact Analysis.* These analyses considered the related projects in assessing the potential for the Project to contribute to cumulative impacts in 2016, the projected opening year for the Project. By contrast, the additional Cumulative Freeway Analysis considers the potential for the related projects and projected growth in ambient traffic to provide cumulative impact analysis for Year 2035 which, as discussed above, is the long-range planning horizon defined by Caltrans, the state agency responsible for the planning, maintenance, and operation of the freeway system. The additional analysis of Year 2035 freeway conditions in response to the long-range freeway planning horizon defined by Caltrans does not affect the methodology, approach, or conclusions for analysis of potential cumulative impacts in 2016 for

4 Los Angeles Department of Transportation, *Traffic Study Policies and Procedures* (August 2014), 16.

the other topics addressed in the EIR, including air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, land use and planning, local street network, and utilities and service systems, This is because Caltrans' policy to conduct long-term planning for state highway facilities consistent with the SCAG RTP/SCS planning horizon is not applicable to other topics for this reason. In addition, as discussed above, the Writ required additional analysis of cumulative freeway traffic impacts. All other portions of the EIR were determined to comply with CEQA. No additional or updated analysis of cumulative impacts for these other topics is, therefore, required by the Writ or the freeway cumulative impact analysis.