V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.*

CEQA Guidelines Section 15126.6(b) states that the discussion of project alternatives must focus on those alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines Section 15126.6(f) further directs that the range of alternatives required in an EIR is governed by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered, pursuant to CEQA Guidelines Section 15126.6(e)(2).

2. Overview of Selected Alternatives

As discussed above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of the Project while still feasibly obtaining most of the basic Project objectives. As discussed in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located in proximity to LAX and major regional roadways. To achieve this underlying purpose, the Project objectives are defined as follows:

- Preserve critically important industrial zoned land strategically located near LAX's cargo service providers and major regional roadways to streamline goods movement;
- Reduce vehicle miles traveled (VMT) by situating an industrial use on an infill site in close proximity to LAX's cargo service providers and major freeways;
- Promote local and regional mobility objectives by creating an employment hub in an area served by existing and future transit/rail stations;
- Provide for development that is consistent with the existing zoning and land use designations of the Project Site;
- Advance innovative and sustainable development practices and, where viable, explore and advance the transition toward clean technologies and other transformative technologies;

- Develop a state-of-the-art industrial center with intentional building orientation and design, ensuring compatibility with surrounding uses while optimizing operational logistics;

- Promote local and regional economic growth by redeveloping the Project Site with an economically viable industrial project that generates new tax revenues, and creates a wide range of jobs, including construction jobs, within Los Angeles; and

- Provide an industrial center that incorporates sustainable and green building design and construction to promote resource conservation, including waste reduction, solar, efficient water management techniques, and conservation of energy to achieve a LEED Certification-equivalent building.

Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would not result in significant Project-level impacts that cannot be feasibly mitigated. With respect to cumulative impacts, implementation of the Project together with the related projects would also not result in significant impacts that cannot be mitigated. While no significant and unavoidable impacts would occur under the Project, the Project would result in significant impacts with respect to geology and soils (paleontological resources) and hazards and hazardous materials; however these impacts would be reduced to less-than-significant levels after implementation of mitigation measures.

Based on the environmental impacts of the Project, the basic objectives established for the Project, and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation:

- **Alternative 1, No Project Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Under Alternative 1, the physical conditions of the Project Site would generally remain as they were at the time the Notice of Preparation (NOP) was published for the Project. Specifically, the existing buildings and rental car uses would remain on the Project Site, and no new construction would occur.

- **Alternative 2, Reduced Floor Area Alternative:** Alternative 2 would involve the same uses proposed by the Project while reducing the amount of total new floor area by approximately 30 percent when compared to Option 1 and by approximately 25 percent when compared to Option 2. Specifically, Alternative 2 would be comprised of 250,000 square feet of warehouse floor area and 56,000 square feet of associated office floor area for a total floor area of 306,000 square feet (compared to Option 1's 435,390 square feet of total floor area, and Option 2's 410,056 square feet of floor area). Upon completion, Alternative 2 would result in a floor area ratio (FAR) of 0.387:1. As with the Project, a total of 37,860 square feet of existing commercial and industrial uses and associated surface parking areas would be demolished under this alternative. Maximum building height would

remain at 50 feet (the same as the Project's maximum building height). A total of 284 vehicle parking spaces and 76 trailer parking spaces would be provided under Alternative 2. Although, Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would require the same maximum depth of excavation as the Project (10 feet below ground surface [bgs] and similar amount of grading and earthwork activities across the Project Site when compared to the Project. Alternative 2 would have 1,022 cubic yards of export and 6,728 cubic yards of import.

- **Alternative 3, Industrial/Office Business Park Alternative:** Alternative 3 would develop an industrial/office business park comprised of 202,000 square feet of office uses and 208,024 square feet of warehouse uses for a total of 410,024 square feet of floor area, up to 46 feet in height. The one-story industrial building with mezzanine on the northern portion of the Project Site (Building 1) would have a floor area of 99,280 square feet comprised of 95,280 square feet of warehouse floor area and 4,000 square feet of office floor area. The two-story office building on the western portion of the Project Site (Building 2) would have a floor area of 194,000 square feet. The one-story industrial building with mezzanine on the eastern portion of the Project Site (Building 3) would have a floor area of 116,744 square feet comprised of 112,744 square feet of warehouse floor area and 4,000 square feet of office floor area. Overall, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar to the Project.

  Upon completion, Alternative 3 would result in a FAR of 0.52:1. As with the Project, a total of 37,860 square feet of existing commercial and industrial uses and associated surface parking areas would be demolished under this alternative. A total of 597 vehicle parking spaces would be provided under Alternative 3. Alternative 3 would have a similar building footprint compared Option 2 of the Project, would require the same maximum depth of excavation as the Project (10 feet bgs), and similar amount of grading and earthwork activities across the Project Site when compared to the Project. Alternative 3 would have 5,350 cubic yards of export and 485 cubic yards of import

Table V-1 on page V-5 provides a comparison of the Project and the three alternatives being considered. Each of these alternatives is described further in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below. As with the Project, where differences in Option 1 and Option 2 could alter potential impacts, the options are considered separately. The alternatives analysis accounts for both development options and, generally, the term "Project" is referring to both options unless stated otherwise.

Table V-1
Summary Comparison of Development Proposed under Alternatives to the Project[a]

	Project: Option 1	Project: Option 2	Alternative 1: No Project Alternative	Alternative 2: Reduced Intensity Alternative	Alternative 3: Industrial/Office Business Park Alternative
Industrial	355,390 sf	320,056 sf	—	250,000 sf	208,024 sf
Office	80,000 sf	90,000 sf	—	56,000 sf	202,000 sf
Existing Square Footage to be Removed	37,860 sf	37,860 sf	—	37,860 sf	37,860 sf
Total New Construction	435,390 sf	410,056 sf	—	306,000 sf	410,024 sf
Total Floor Area Upon Completion	435,390 sf	410,056 sf	—	306,000 sf	410,024 sf
Total FAR	0.6:1	0.5:1	—	0.39:1	0.52:1
Total Parking	274 vehicle parking spaces and 90 trailer parking spaces	369 vehicle parking spaces	—	284 vehicle parking spaces and 76 trailer parking spaces	597 vehicle parking spaces
Maximum Height	50 ft	46 ft	—	50 ft	46 ft
Maximum Depth of Excavation	10 ft bgs	10 ft bgs	—	10 ft bgs	10 ft bgs
Soil Export	1,460 cy	5,350 cy	—	1,022 cy	5,350 cy
Soil Import	9,612 cy	485 cy		6,728 cy	485 cy

cy = cubic yards

ft bgs = feet below ground surface

sf = square feet

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, outdoor dining areas, and basement storage areas."*

Source: Eyestone Environmental, 2025.

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that

may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Based on the CEQA Guidelines, the alternatives that have been considered and rejected include the following:

- **Alternative Project Site:** The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located in proximity to LAX and major regional roadways. The availability of an alternative site is also restricted by the Project's objectives, which include, but are not limited to, (1) preserving critically important industrial zoned land strategically located near LAX's cargo service providers and major regional roadways to streamline goods movement; (2) reducing vehicle miles traveled (VMT) by situating an industrial use on an infill site in close proximity to LAX's cargo service providers and major freeways; and (3) developing a state-of-the-art industrial center with intentional building orientation and design, ensuring compatibility with surrounding uses while optimizing operational logistics.

  In addition, an alternative site is not considered feasible as it is not expected, and would be speculative, that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project.

  Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each of the three selected alternatives described above is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative pursuant to CEQA Guidelines Section 15126.6(c). The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:

- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less”.

- Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater”.

- Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar”.

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-8.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Floor Area Alternative	Alternative 3: Industrial/Office Business Park Alternative
A. AESTHETICS				
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Light and Glare				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
B. AIR QUALITY				
Conflicts with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Regional Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Localized Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Floor Area Alternative	Alternative 3: Industrial/Office Business Park Alternative
C. ENERGY				
Wasteful, inefficient, or unnecessary consumption of Energy Resources				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)				
Paleontological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
F. HAZARDS AND HAZARDOUS MATERIALS				
Construction	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. LAND USE AND PLANNING				
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Floor Area Alternative	Alternative 3: Industrial/Office Business Park Alternative
H. NOISE				
Construction				
On-Site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-Site Vibration (Human Annoyance)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation				
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION				
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	No Impact	Less (No Impact)	Similar (No Impact)	Similar (No Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Floor Area Alternative	Alternative 3: Industrial/Office Business Park Alternative
Design Hazards	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Freeway Safety	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES				
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS (ENERGY INFRASTRUCTURE)				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

Source: Eyestone Environmental, 2025.

V. Alternatives

A. Alternative 1: No Project Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, Alternative 1, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would generally be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today.[1] Specifically, the existing buildings and uses would remain on the Project Site, and no new construction would occur.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Light and Glare

(a) Construction

Alternative 1 would not involve the construction of any new development on-site. Therefore, Alternative 1 would not introduce new light sources associated with construction equipment or construction-related equipment and materials with the potential to cause glare. As such, no impacts related to light and glare associated with construction activities would

[1] *It is anticipated that the interim Project Site remediation activities would still occur under the No Project Alternative.*

occur under Alternative 1. Thus, light and glare impacts during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing uses on the Project Site, introduce any new sources of light or glare on the Project Site, or otherwise increase the amount of activity occurring on-site. Therefore, Alternative 1 would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Air Quality

(1) Conflicts with Plans

Alternative 1 would not result in new development or involve any new construction activities on the Project Site. Therefore, no construction-related air quality emissions would occur, and Alternative 1 would not conflict with or obstruct implementation of the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). Impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Regional Emissions

(a) Construction

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. Thus, impacts related to regional air quality emissions during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no new operational air quality impacts associated with regional emissions would occur under Alternative 1. Thus, impacts related to regional air quality emissions during operation would be less when compared to the less-than-significant impacts of the Project.

(3) Localized Emissions

(a) Construction

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, no construction air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no new operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). No impacts associated with the construction-related release of TACs would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. As such, no increase in mobile source emissions and their associated TACs would be generated under Alternative 1, and no new impact would occur. Therefore, the operational TACs impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources, and no impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in an increase in the wasteful, inefficient, or unnecessary consumption of energy resources. No operational impacts related to energy would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

Alternative 1 would not involve any new development. As such, Alternative 1 would not increase energy usage at the Project Site, and therefore would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under this alternative. Therefore, the impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of previously unknown paleontological resources. No impacts associated with paleontological resources would occur under Alternative 1, and impacts would be less when compared to the impacts of the Project, which would be less-than-significant after mitigation.

e. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Project Site. As such, no new greenhouse gas (GHG) emissions beyond what is currently generated by the existing uses

on the Project Site would be generated under Alternative 1. Therefore, no impacts related to GHG emissions would occur, and the GHG emissions impacts of Alternative 1 would be less when compared the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Construction activities for the Project, including earthwork, grading, and demolition, would not occur under Alternative 1. Therefore, Alternative 1 would not involve any new use, handling, storage, or disposal of construction-related hazardous materials or have the potential to expose or release potentially contaminated soil. Impacts would be less when compared to the Project's less-than-significant after mitigation, which would be avoided under this alternative.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not involve any new or increased use, handling, storage, or disposal of hazardous materials, hazardous emissions, or upset or accident conditions. No impacts would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

g. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related on-site and off-site noise impacts would occur under this alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site noise would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related vibration would be generated on-site or off-site under Alternative 1, and no construction-related vibration impacts would occur. As such, on- and off-site construction-related vibration impacts (related to both building damage and human annoyance) would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new on- or off-site vibration sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on- and off-site vibration would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

i. Transportation

Since Alternative 1 would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no new transportation impacts would occur with respect to construction or operation, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; geometric design features; and freeway safety. Therefore, impacts under Alternative 1 would be less when compared to the impacts of the Project, which would be less than significant with respect to conflicts with programs, plans, ordinances, or policies addressing the circulation system; geometric design features; and freeway safety, and no impacts with respect to VMT.

j. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover a buried tribal cultural resource. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Utilities and Service Systems (Energy Infrastructure)

(1) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. As such, impacts related to energy infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. Since no operational impacts related to energy infrastructure would occur under Alternative 1, impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would eliminate the Project's less-than-significant-with-mitigation impacts related to geology and soils (paleontological resources) and hazards and hazardous materials. Impacts associated with the remaining environmental issues would generally be less when compared to Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and uses would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located in proximity to LAX and major regional roadways. The Project's specific objectives are provided below. Furthermore, Alternative 1 would not meet any of the Project basic objectives as listed below:

- Preserve critically important industrial zoned land strategically located near LAX's cargo service providers and major regional roadways to streamline goods movement;

- Reduce VMT by situating an industrial use on an infill site in close proximity to LAX's cargo service providers and major freeways;

- Promote local and regional mobility objectives by creating an employment hub in an area served by existing and future transit/rail stations;

- Provide for development that is consistent with the existing zoning and land use designations of the Project Site;

- Advance innovative and sustainable development practices and, where viable, explore and advance the transition toward clean technologies and other transformative technologies;

- Develop a state-of-the-art industrial center with intentional building orientation and design, ensuring compatibility with surrounding uses while optimizing operational logistics;

- Promote local and regional economic growth by redeveloping the Project Site with an economically viable industrial project that generates new tax revenues, and creates a wide range of jobs, including construction jobs, within Los Angeles; and

- Provide an industrial center that incorporates sustainable and green building design and construction to promote resource conservation, including waste reduction, solar, efficient water management techniques, and conservation of energy to achieve a LEED Certification-equivalent building.

V. Alternatives

B. Alternative 2: Reduced Floor Area Alternative

1. Description of the Alternative

Alternative 2 would involve the same uses proposed by the Project while reducing the amount of total new floor area by approximately 30 percent when compared to Option 1 and by approximately 25 percent when compared to Option 2. Specifically, Alternative 2 would be comprised of 250,000 square feet of warehouse floor area and 56,000 square feet of associated office floor area for a total floor area of 306,000 square feet (compared to Option 1's 435,390 square feet of total floor area, and Option 2's 410,056 square feet of floor area). Upon completion, Alternative 2 would result in a FAR of 0.387:1. As with the Project, a total of 37,860 square feet of existing commercial and industrial uses and associated surface parking areas would be demolished under this alternative. Maximum building height would remain at 50 feet (the same as the Project's maximum building height). A total of 284 vehicle parking spaces and 76 trailer parking spaces would be provided under Alternative 2. Although, Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would require the same maximum depth of excavation as the Project (10 feet bgs) and similar amount of grading and earthwork activities across the Project Site when compared to the Project. Alternative 2 would have 1,022 cubic yards of export and 6,728 cubic yards of import. A conceptual site plan for Alternative 2 is provided in Figure V-1 on page V-21.

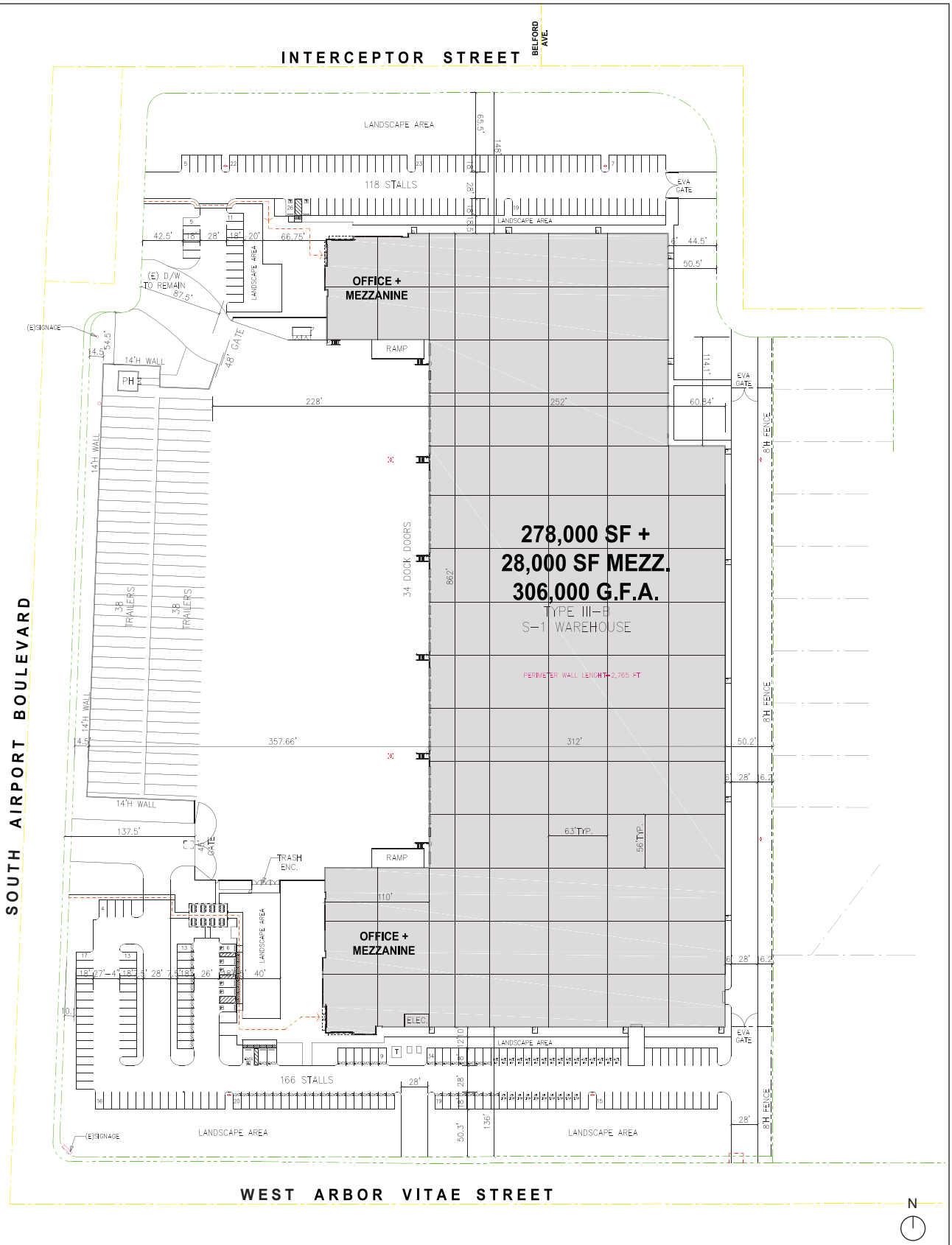

Figure V-1
Alternative 2 Conceptual Site Plan

Source: Rexford Industrial, September 2025.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project Site, including the City of Los Angeles General Plan Framework Element and the Conservation Element, the Westchester–Playa del Rey Community Plan, the Citywide Urban Design Guidelines, the LAMC (including the zoning, "Q" Conditions applicable to the Project Site), and California Code of Regulations, Title 24, as it relates to lighting. As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 2 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 2.

As previously discussed, Alternative 2 would develop similar uses to the Project with a reduction in floor area. In addition, Alternative 2 would be constructed within the same Project Site. As such, the same local plans applicable to the Project would be applicable to Alternative 2. Overall, with the development of similar uses to the Project and a similar design to that of Option 1 of the Project, but with a reduction in proposed development, Alternative 2 would not conflict with the applicable zoning and other regulations governing scenic quality Specifically, Alternative 2 would be designed consistent with applicable plans related to scenic quality, through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing with planting along the perimeter of the site. Alternative 2 would also include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard, as well as in the interior of the Project Site. Therefore, similar to the Project, the impacts of Alternative 2 related to potential conflicts with the applicable zoning and other regulations governing scenic quality would be less than significant.

(2) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 2 would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent evening construction includes artificial light sources, such activity would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 2 would be highly

transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, as with the Project, Alternative 2 would include Project Design Features AES-PDF-2 that would require construction lighting be directed away from residential properties and the public right-of-way and NOI-PDF-3 that would require the existing masonry wall along the northern and eastern property lines to be retained and improved or a temporary sound wall be constructed during construction. Therefore, as with the Project, construction activities under Alternative 2 would not create a new source of substantial light or glare or adversely affect daytime or nighttime views in the area. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of a new building lighting and exterior lighting. As with the Project, lighting under Alternative 2 would comply with LAMC lighting requirements and applicable "Q" conditions. In addition, like the Project, Alternative 2 would include Project Design Features AES-PDF-2 and NOI-PDF-4 that would require light sources would be shielded and/or directed inward to minimize light spill-over to neighboring properties and would provide for the retention or replacement of the existing masonry wall on the eastern property line, which would shield light from the residential uses to the east as well as Project Design Feature AES-PDF-3 and AES-PDF-5 that would require shielding lighting during operation and directing this lighting downward and/or inward and the use anti-reflective materials or coatings for glass in building facades. Overall, potential light and glare impacts under Alternative 2 would be less than significant and less when compared to the Project's less-than-significant impacts due to the overall reduction in development.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 2 would result in less than significant localized air quality emissions and would not conflict with the AQMP. As with the Project, Alternative 2 represents infill development located within a transit priority area (TPA) and a SCAG-designated Priority Development Area (PDA) (i.e., Neighborhood Mobility Area [NMA], Livable Corridor and Transit Priority Area [TPA]) as well as a High-Quality Transit Area (HQTA), thus reducing VMT. As with the Project, Alternative 2 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new air quality violations, exceed any of the state and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 2 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 2 would support the City of Los Angeles and SCAQMD's objectives

of reducing VMT and the related vehicular air emissions by promoting the use of alternative modes of transportation, including convenient access to public transit, opportunities for walking and biking, concentrating urban density along major arterials and near transit options, and including primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. As such, similar to the Project, Alternative 2 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 2 would be less than significant and similar to the impacts of the Project.

(2) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 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 Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As discussed in Section IV.B, Air Quality, of this Draft EIR, during Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases).

As summarized in Table V-1 on page V-5, while Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would still require similar amount of grading activities across the Project Site when compared to the Project. With the overall reduction in total building area, the overall duration of construction activities would be reduced in comparison to the Project. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 2 would be similar to the Project on peak construction days because the maximum number of construction equipment and trucks operating during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity of maximum construction activity on peak days). As such, air emissions during maximum activity days, which determine the impact conclusion, would be similar to those of the Project. Hence, as with the Project, construction-related daily maximum regional construction emissions under Alternative 2 would not exceed SCAQMD daily significance thresholds. Therefore, impacts under Alternative 2, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 2 would reduce the overall development proposed on the Project Site. As such, the number of daily vehicle trips and VMT generated by Alternative 2 would be approximately 30 percent less than the daily vehicle trips and VMT generated by Option 1 and 25 percent less than the daily vehicle trips and VMT generated by Option 2.[2] Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 2 would be less than the emissions generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 2, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 2 operation would be less than significant and less than the less than significant impacts of the Project.

(3) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. In addition, as previously discussed above, the intensity of construction activities under Alternative 2 would be similar to the Project on days with maximum construction activities. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions generated by Alternative 2 exceed SCAQMD screening thresholds during construction of Alternative 2. Impacts associated with localized air pollutant emissions during construction of Alternative 2 would be less than significant and similar to the less significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, the number of daily vehicle trips and VMT generated by Alternative 2 would be less than the daily vehicle trips and VMT generated by the Project.[3] In addition, area sources and stationary sources would also generate less on-site operational air emissions

[2] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[3] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

compared to the Project as the development proposed under Alternative 2 would be reduced compared to the Project. Accordingly, localized air quality impacts under Alternative 2 operation would be less than significant and less than the less than significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in the overall duration and the amount of construction activities as a result of the reduced development. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 2, the number of delivery truck trips and associated diesel particulate matter emissions would be anticipated to decrease by 30 percent in compared to Option 1 and 25 percent as compared to Option 2. As shown in Appendix C.1 of this Draft EIR, impacts due to TAC emissions and the corresponding cancer risk under the Project would be less than significant. Therefore, Alternative 2 operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities under Alternative 2 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment,

delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 2 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity. However, as with the Project, with compliance with applicable CALGreen requirements and Project Design Feature GHG-PDF-1 prohibiting the use of natural gas during Project operations for new buildings, Alternative 2 would similarly generate a net decrease in the on-site demand for natural gas. Notwithstanding, based on the overall reduction in total development proposed by Alternative 2, electricity, natural gas, and petroleum-based fuel consumption for Alternative 2 would be less than the Project's estimated increase in energy consumption. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in California's Green Building Standards Code (Title 24/CALGreen standards). Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to energy use under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include CALGreen (California Green Building Standards Code – Part 11, Title 24), the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2024–2050 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 2, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as with the Project, Alternative 2 would represent urban infill development within a Transit Priority Area and High Quality Transit Area in close proximity to transit, which would reduce

vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with Senate Bill 375 and SCAG's RTP/SCS. As with the Project, Alternative 2 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 2, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search at the Natural History Museum of Los Angeles (NHMLA) did not identify any fossil vertebrate localities within the Project Site. Additionally, the Project Site is currently developed and has been previously graded. However, the records search documented significant fossil finds nearby from the same sedimentary deposits that occur within the Project Site, at a depth of 14 feet bgs to depths of at least 40 feet bgs. Further, Qoe, which likely extends to depths of at least 14 feet bgs, may be underlain by older alluvial deposits capable of preserving fossils at 14 feet bgs or greater.

As previously described, while Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would still require the same maximum depth of excavation as the Project (10 feet bgs) and similar amount of grading activities across the Project Site when compared to the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement the same mitigation measures (**GEO-MM-1 and MM-2**) as the Project to address potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 2 would be less than significant after mitigation, and such impacts would be similar when compared to the Project's impacts.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. Under Alternative 2, the number of daily trips, daily VMT trip generation, and energy and water consumption would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. In addition, as with the Project, Alternative 2 would be designed to comply with the requirements of Title 24 and the Los Angeles Green Building Code. Also, as with the Project, this alternative would comply with Project Design Feature GHG-PDF-1 prohibiting the use of natural gas during Project operations for new buildings. Like the Project, Alternative 2 would also increase urban

development within a TPA and High Quality Transit Corridor (HQTC) in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle-ready parking, which would all reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 2 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Such impacts would be similar to the Project's less-than-significant impacts.

With regard to potential risk of accident or upset conditions, Alternative 2 would involve the same types of construction activities as the Project with the same potential to encounter the presence of previously unidentified contaminated soil and soil gas beneath the Project Site that could exacerbate risk of upset and accident conditions associated with the release of hazardous materials into the environment. Additionally, the Project Site currently includes HRECs and RECs consisting of existing USTs, current and former hydraulic lifts, and three oil/water clarifiers. As described in Project Design Feature HAZ-PDF-1, removal of these subsurface features is identified as an interim remediation project and all ground disturbance activities will be completed prior to, and independent of Alternative 2. Further, as with the Project, Alternative 2 would comply with all applicable regulatory requirements related to hazards and would implement Mitigation Measure HAZ-MM-1 requiring a Soil Management Plan (SMP) for contaminated soils. Thus, similar to the Project, under Alternative 2, potential impacts associated with the release of hazardous materials during upset and/or accident conditions would be less than significant after mitigation.

With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in numerous databases reviewed as part of the Phase I, including in Appendix F.1 of this Draft EIR. Implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the

Project, Alternative 2 would implement this mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous site would be less than significant after mitigation.

(2) Operation

As with the Project, operation of Alternative 2 would involve the routine use of small quantities of potentially hazardous materials typical of those used in industrial warehouses, including cleaning products, paints, and those used for maintenance of landscaping. As with the Project, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 2 would be handled, used, stored, and disposed of in accordance with manufacturer's standards and all applicable local, state, and federal regulations. Overall, potential impacts associated with hazardous materials use and the resultant potential risk of upset during operation of Alternative 2 would be less than significant. Such impacts would be slightly less when compared to the Project's less-than-significant impacts as a result of the reduced floor area.

g. Land Use and Planning

As described above, Alternative 2 would develop similar uses as proposed by the Project while reducing the amount of total floor area by approximately 30 percent when compared to Option 1 and 25 percent when compared to Option 2. As with the Project, following approval of the proposed entitlements, Alternative 2 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the General Plan, including the Framework Element, the Mobility Plan, the Conservation Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), Westchester–Playa del Rey Community Plan, the City of Los Angeles Municipal Code (LAMC), the Los Angeles Coastal Transportation Corridor Specific Plan, and the Citywide Design Guidelines, Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan, and SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS). Therefore, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar when compared to the less-than-significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project; however, the overall amount of construction activities and duration would be reduced compared to the Project due to the reduction in overall floor area. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the grading, excavation, and foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, noise levels during maximum activity days, which is used for measuring impact significance, would be similar to those of the Project. As with the Project, Alternative 2 would implement Project Design Feature NOI-PDF-3, which requires the existing masonry wall along the northern and eastern property lines to be retained and/or improved, which would minimize construction noise. Therefore, as with the Project, on-site construction noise impacts under Alternative 2 would be less than significant.

With regard to off-site noise associated with truck travel, Alternative 2 would result in 1,022 cubic yards of soil export and 6,628 cubic yards of import. Thus, the number of haul trucks associated with import and export under Alternative 2 would be less than Option 1, which would require 1,460 cubic yards of export and 9,612 tons of import. Alternative 2 would result in a greater number of haul truck trips when compared with Option 2, which would require 5,350 cubic yards of export and 485 cubic yards of import. However, the number of haul trips on a peak haul day would be similar under Alternative 2 and both Project Options. Therefore, as with the Project, noise impacts due to off-site construction trucks under Alternative 2 would be less than significant. In addition, to the extent this alternative requires similar off-site improvements as the Project, potential impacts associated with installation of off-site improvements would be less than significant, similar to the Project.

Overall, the construction-related noise impacts of Alternative 2 would be similar to the Project.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, parking areas and loading docks, and off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from

similar on-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses under this alternative (i.e., a reduction of 129,390 square feet when compared with Option 1 and a reduction of 104,056 square feet when compared with Option 2) the noise levels from mechanical equipment and loading dock operations would be slightly reduced. In addition, similar to the Project, Alternative 2 would implement Project Design Features NOI-PDF-1 (acoustic screening of mechanical equipment from off-site noise receptors), NOI-PDF-2 (sound wall along the northern, western, and southern sides of the parked trailers), and NOI-PDF-4 (retain and improve the existing masonry wall along the eastern property line), which would minimize on-site operational noise. Similar to the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02 that prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in total floor area.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate less operational traffic when compared to the Project. Therefore, as with the Project, off-site traffic noise impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount of development and associated duration of construction would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). Therefore, peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project as the same activities and same equipment would occur during the peak construction period. Accordingly, as with the Project, construction activities under Alternative 2 would result in less than significant on-site and off-site vibration impacts. Overall, construction-related vibration impacts associated with Alternative 2 would be similar to the Project.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2; however, these sources would be reduced compared to the Project due to the overall reduction in floor area and associated operational activities. As with the Project, vehicular-induced vibration from Alternative 2 would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

i. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project and would develop similar uses to the Project with a reduction in floor area. As such, the same transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 2. These include the Mobility Plan; Plan for a Healthy Los Angeles; Westchester–Playa del Rey Community Plan; Coastal Transportation Corridor Specific Plan; LAMC; LADOT Vision Zero; and Citywide Design Guidelines; and SCAG's 2020-2045 RTP/SCS. As with the Project, Alternative 2 would not conflict with these plans, policies and regulations. Like the Project, Alternative 2 would intensify urban development within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA) and a HQTC in close proximity to a high-traffic commercial corridor that is well-served by a variety of public transit options. Alternative 2 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all applicable design element requirements, including those related to proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design, which would improve safety, visibility, mobility, and accessibility to reduce, if not totally avoid, any effects to the safety and mobility of all users on-site and on the public ROWs. Furthermore, like the Project, Alternative 2 would promote pedestrian activity and reduce VMT by providing pedestrian and bicycle improvements, TDM measures, and providing public right of way improvements (i.e., new street trees, lighting, bicycle parking and supporting amenities, etc.). Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 2 in this regard would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, as shown in Appendix L of this Draft EIR, Alternative 2 is anticipated to result in an overall net decrease of 2,656 daily trips and a net decrease of 18,576 daily VMT. Accordingly, Alternative 2 would not generate a net increase of 250 or more daily vehicle trips to meet the screening criteria for further VMT analysis as identified in LADOT's *Transportation Assessment Guidelines*.[4] Therefore, under Alternative 2, impacts with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant and similar when compared to the less-than-significant impacts of the Project.

With respect to hazards due to geometric design features, vehicular access to the Project Site under Alternative 2 would be provided along the southern boundary on West Arbor Vitae Street and along the western boundary on Airport Boulevard and Interceptor Street, similar to Option 1. Additionally, as with Option 1, Alternative 2 would include Project Design Feature TR-PDF-2, which states that the existing traffic signal at the northwestern corner of the Project Site on Interceptor Street would be modified to incorporate the Project driveway to limit potential impediments to traffic flow from trucks exiting the Project Site.

As Similar to the Project, Alternative 2's driveways would provide adequate sight distance for vehicles entering and departing the Project Site, as it would be placed perpendicular to roadways and no unusual or new obstacles would be presented in the design that would be considered hazardous. Additionally, the vehicular driveways would intersect Interceptor Street, Airport Boulevard and West Arbor Vitae at a right angle to maximize sight distance. In addition, all driveways would have sufficient capacity to accommodate the estimated inbound and outbound traffic volume and, therefore, no hazards would occur related to operation of the driveway. Furthermore, as with the Project, proposed driveways would be designed in compliance with applicable LADOT requirements regarding site access and would not impede access to and from the Project Site. Therefore, hazards due to geometric design features impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

With respect to freeway safety, as discussed in Section IV.I, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix I.1 of this Draft EIR, the Project would add fewer than 25 trips to the freeway off-ramps analyzed in both the morning and afternoon peak hours. As Alternative 2 would

[4] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

generate fewer trips than the Project (under both Options), Alternative 2 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

j. Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no archaeological sites have been previously recorded at the Project Site according to the CHRIS and SLF records searches; LAN-214 is the only archaeological site within a 0.5-mile radius to the Project Site that was at least reported to contain a Native American component and consisted of "chipped stone points" (i.e., lithic projectile points). The Project Site is fully paved and developed with several buildings and the potential for a buried tribal cultural resource is low. Furthermore, consultation with the applicable California Native American Tribes conducted in accordance with Assembly Bill (AB) 52 did not identify any tribal cultural resources on the Project Site.

As previously described, while Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would still require the same maximum depth of excavation as the Project (10 feet bgs) and similar amount of grading activities across the Project Site when compared to the Project. Therefore, like the Project, Alternative 2 has the potential to uncover a buried tribal cultural resource. Like the Project, Alternative 2 would implement the City's standard tribal cultural resources Condition of Approval (COA) to address inadvertent discovery of tribal cultural resources. Therefore, impacts with respect to tribal cultural resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project as tribal cultural resources are generally located less than 10 feet below the surface in this area.

k. Utilities and Service Systems (Energy Infrastructure)

(1) Construction

As discussed above, Alternative 2 would reduce the amount of energy needed for construction activities based on the reduction in development and duration. As discussed in Section IV.C, Energy, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 2 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 2 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity associated with construction of Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

As previously discussed, the total energy consumption of Alternative 2 would be less than that of the Project due to the reduction in uses. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 2. Impacts related to energy infrastructure would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 2 would result in less-than-significant after mitigation impacts associated with hazards and hazardous materials (construction) and paleontological resources that would be similar to the Project's less-than-significant with mitigation impacts.

Alternative 2 would result in similar less-than-significant impacts as the Project with regard to the following topics: conflicts with the applicable zoning and other regulations governing scenic quality; light and glare; air quality (conflicts with plans); air quality (regional emissions – construction), air quality (local emissions - construction) air quality (toxic air contaminants– construction); energy (conflict with plans for renewable energy or energy efficiency); greenhouse gas emissions; hazards and hazardous materials (operations); land use and planning; noise (construction); transportation (conflicts with transportation plans; VMT; design hazards) and tribal cultural resources.

Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: air quality (regional emissions – operations); air quality (localized emissions – operations); air quality (toxic air contaminants –operation); energy (wasteful, inefficient, or unnecessary consumption of energy resources – construction or operation); hazard and hazardous materials (operation); noise (operation) and transportation (freeway safety); utilities – energy infrastructure.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the same type of uses as the Project while reducing the amount of total floor area by approximately 30 percent as compared to Option 1 and approximately 25 percent when compared to Option 2. As such, Alternative 2 would mostly meet the underlying purpose of the Project, which is redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located in proximity to LAX and major regional roadways. However, Alternative 2 would not meet the underlying purpose of the Project to the same extent as the Project.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives as effectively as the Project:

- Preserve critically important industrial zoned land strategically located near LAX's cargo service providers and major regional roadways to streamline goods movement.
- Reduce vehicle miles traveled (VMT) by situating an industrial use on an infill site in close proximity to LAX's cargo service providers and major freeways.
- Promote local and regional mobility objectives by creating an employment hub in an area served by existing and future transit/rail stations.
- Provide for development that is consistent with the existing zoning and land use designations of the Project Site.
- Advance innovative and sustainable development practices and, where viable, explore and advance the transition toward clean technologies and other transformative technologies.
- Provide an industrial center that incorporates sustainable and green building design and construction to promote resource conservation, including waste reduction, solar, efficient water management techniques, and conservation of energy to achieve a LEED Certification-equivalent building.

Alternative 2 would not meet the following objectives to the same extent as the Project due to the overall reduction in the proposed warehouse and office floor area:

- Develop a state-of-the-art industrial center with intentional building orientation and design, ensuring compatibility with surrounding uses while optimizing operational logistics.
- Promote local and regional economic growth by redeveloping the Project Site with an economically viable industrial project that generates new tax revenues, and creates a wide range of jobs, including construction jobs, within Los Angeles.

V. Alternatives

C. Alternative 3: Industrial/Office Business Park Alternative

1. Description of the Alternative

Alternative 3, the Industrial/Office Business Park Alternative would develop an industrial/office business park comprised of 202,000 square feet of office uses and 208,024 square feet of warehouse uses for a total of 410,024 square feet of floor area, up to 46 feet in height. The one-story industrial building with mezzanine on the northern portion of the Project Site (Building 1) would have a floor area of 99,280 square feet comprised of 95,280 square feet of warehouse floor area and 4,000 square feet of office floor area. The two-story office building on the western portion of the Project Site (Building 2) would have a floor area of 194,000 square feet. The one-story industrial building with mezzanine on the eastern portion of the Project Site (Building 3) would have a floor area of 116,744 square feet comprised of 112,744 square feet of warehouse floor area and 4,000 square feet of office floor area. Overall, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar to the Project.

Upon completion, Alternative 3 would result in a FAR of 0.52:1. As with the Project, a total of 37,860 square feet of existing commercial and industrial uses and associated surface parking areas would be demolished under this alternative. A total of 597 vehicle parking spaces would be provided under Alternative 3. Alternative 3 would have a similar building footprint compared to Option 2 of the Project, would require the same maximum depth of excavation as the Project (10 feet bgs), and similar amount of grading and earthwork activities across the Project Site when compared to the Project. Alternative 3 would have 5,350 cubic yards of export and 485 cubic yards of import. A conceptual site plan for Alternative 3 is provided in Figure V-2 on page V-39.

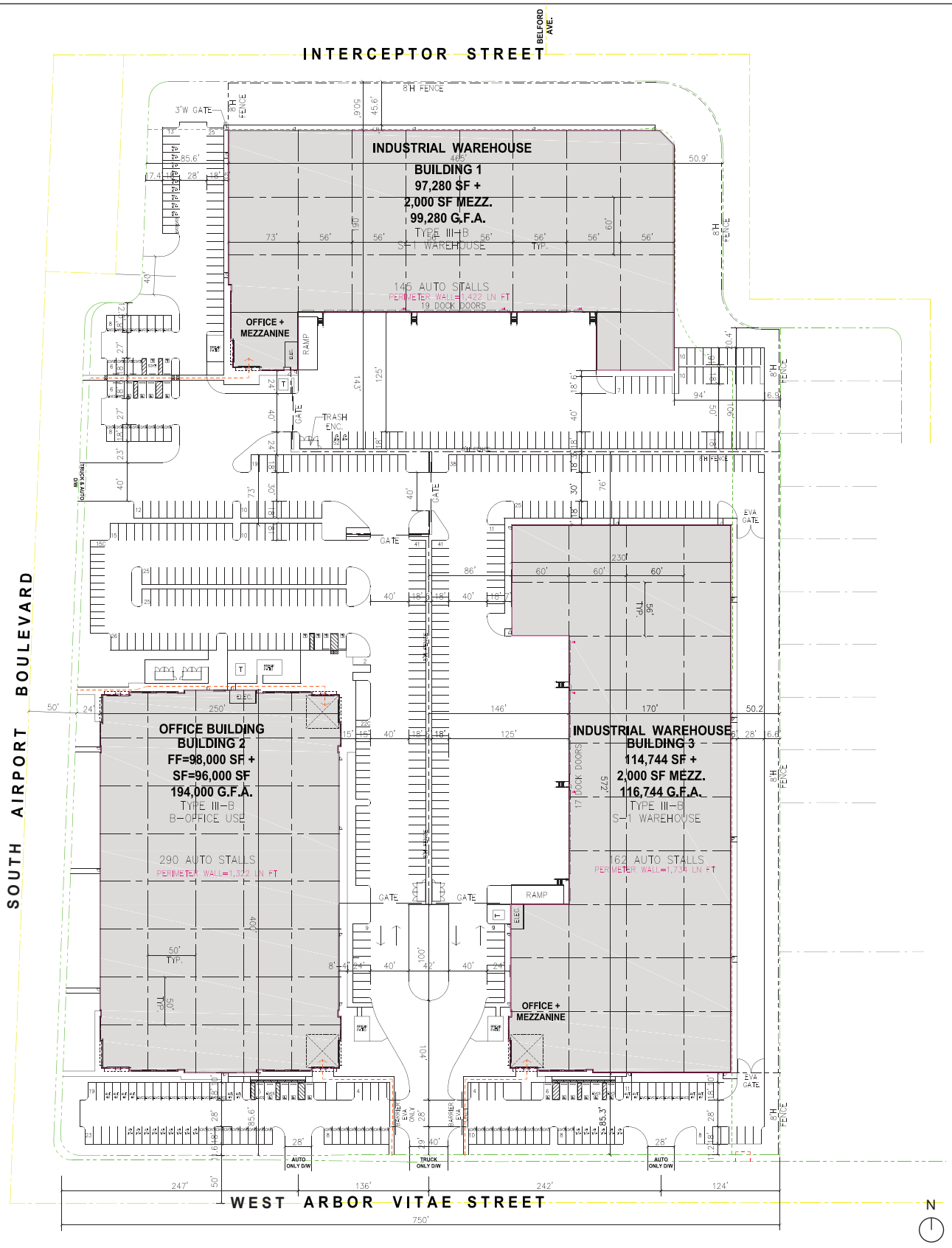

Figure V-2
Alternative 3 Conceptual Site Plan

Source: Rexford Industrial, September 2025.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of existing City plans and regulations governing scenic quality are applicable to the Project Site, including the City of Los Angeles General Plan Framework Element and the Conservation Element, the Westchester–Playa del Rey Community Plan, the Citywide Urban Design Guidelines, the LAMC (including the zoning, "Q" Conditions applicable to the Project Site), and California Code of Regulations, Title 24, as it relates to lighting). As demonstrated in the analysis in Section IV.A, Aesthetics, of this Draft EIR, overall, the Project would not conflict with these regulations. Since Alternative 3 would be developed within the same Project Site as the Project, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 3.

As described above, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar to the Project. Specifically, it would include a reduction of warehouse uses to 208,024 square feet and an increase in office uses to 202,000 square feet, creating a hybrid office and industrial type development when compared to the Project. Additionally, while the maximum building height of 46 feet would be the same compared to Option 2, it would be less than Option 1 by four feet. Like the Project, Alternative 3 would generally be consistent with the type, density, and height of land uses in the Project vicinity. Additionally, Alternative 3 would be designed consistent with applicable plans related to scenic quality, through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing with planting along the perimeter of the site. Alternative 3 would also include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard, as well as in the interior of the Project Site. Similar to the Project, the proposed uses under Alternative 3 would also be designed to be compatible with the general urban characteristics of the surrounding neighborhood. Overall, as with the Project, Alternative 3 would generally not be in conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Therefore, similar to the Project, the impacts of Alternative 3 related to potential conflicts with the applicable zoning and other regulations governing scenic quality would be less than significant.

(2) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 3 would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting. As with the Project, to the extent evening construction includes artificial light sources, such activity would be temporary and would cease upon completion of construction in a given area of the Project Site. As with the Project, any glare generated within the Project Site during construction of Alternative 3 would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, as with the Project, Alternative 3 would include Project Design Features AES-PDF-2 that would require construction lighting be directed away from residential properties and the public right-of-way and NOI-PDF-3 that would require the existing masonry wall along the northern and eastern property lines to be retained and improved or a temporary sound wall be installed during construction. Therefore, as with the Project, construction activities under Alternative 3 would not create a new source of substantial light or glare or adversely affect daytime or nighttime views in the area. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would increase light levels within the Project Site and the surrounding area compared to existing conditions through the introduction of a new building lighting and exterior lighting. As with the Project, lighting under Alternative 3 would comply with LAMC lighting requirements and applicable "Q" conditions. In addition, like the Project, Alternative 3 would include Project Design Features AES-PDF-2 and NOI-PDF-4 that would require light sources would be shielded and/or directed inward to minimize light spill-over to neighboring properties and would provide for the retention or replacement of the existing masonry wall on the eastern property line, which would shield light from the residential uses to the east as well as Project Design Feature AES-PDF-3 and AES-PDF-5 that would require shielding lighting during operation and directing this lighting downward and/or inward and the use anti-reflective materials or coatings for glass in building facades. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

b. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 3 would result in less than significant localized air quality emissions and would not conflict with the AQMP. As with the

Project, Alternative 3 represents infill development located within a TPA and a SCAG-designated HQTA, thus reducing VMT. As with the Project, Alternative 3 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new air quality violations, exceed any of the state and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 3 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 3 would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions by promoting the use of alternative modes of transportation, including convenient access to public transit, opportunities for walking and biking, concentrating urban density along major arterials and near transit options, and including primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. As such, similar to the Project, Alternative 3 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 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 Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As discussed in Section IV.B, Air Quality, of this Draft EIR, during Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases).

As summarized in Table V-1 on page V-5, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project. However, the overall amount of development would remain similar. With the overall total building area and soil import/export similar, the overall duration of construction activities would be similar in comparison to the Project. The intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 3 would be similar to the Project on peak construction days because the maximum number of construction equipment and trucks operating during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no material change to the intensity of maximum construction activity). As such, air emissions during maximum activity days, which determine the impact conclusion, would be similar to those of the Project. Hence, as with the Project, construction-

related daily maximum regional construction emissions under Alternative 3 would not exceed SCAQMD daily significance thresholds. Therefore, impacts under Alternative 3, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity.

(b) Operation

As previously discussed, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar. As summarized in Appendix L of this Draft EIR, based on the proposed uses, Alternative 3 would generate three percent less daily vehicle trips and two percent more daily vehicle trips as the Project for Option 1 and Option 2, respectively. Overall, the daily vehicle trips and related VMT would be similar as the Project which would result in similar emissions generated by the Project. As shown in Appendix D (Energy Calculations), of this Draft EIR, electricity and natural gas usage factors for warehouse uses were conservatively calculated as industrial park, which are the same factors as office use. Thus, with a similar overall floor area, both area sources and stationary sources would generate similar on-site operational air emissions compared to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be similar as the Project's contribution. Thus, impacts to regional air quality under Alternative 3 operation would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. In addition, as previously discussed above, the intensity of construction activities under Alternative 3 would be similar to the Project on days with maximum construction activities. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions generated by Alternative 3 exceed SCAQMD screening thresholds during construction of Alternative 3. Impacts associated with localized air pollutant emissions during construction of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, the number of daily vehicle trips and VMT generated by Alternative 3 would

be similar as the daily vehicle trips and VMT generated by the Project.[5] In addition, area sources and stationary sources would also generate similar on-site operational air emissions compared to the Project as the overall amount of development proposed under Alternative 3 would be similar compared to the Project and the change in square footage of office versus warehouse would result in use of the same electricity and natural gas usage factors. Accordingly, localized air quality impacts under Alternative 3 operation would be less than significant and similar to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be similar as those of the Project due to the similar overall duration and the amount of construction activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, with the reduction in warehouse square footage the number of delivery truck trips and associated diesel particulate matter emissions would be anticipated to decrease by approximately 41 percent and 35 percent in comparison to the Project for Option 1 and Option 2, respectively. As shown in Appendix C.1 of this Draft EIR, impacts due to TAC emissions and the corresponding cancer risk under the Project would be less than significant. Therefore, Alternative 3 operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

[5] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities under Alternative 3 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. The energy consumed during construction of Alternative 3 would be similar compared to the Project due to the similar construction equipment required and overall construction duration. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 3 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 3 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(a) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity. However, as with the Project, with compliance with applicable CALGreen requirements and Project Design Feature GHG-PDF-1 prohibiting the use of natural gas during Project operations for new buildings, Alternative 3 would similarly generate a net decrease in the on-site demand for natural gas and electricity, natural gas, and petroleum-based fuel consumption for Alternative 3 would be similar as the Project's estimated increase in energy consumption. Furthermore, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in California's Green Building Standards Code (Title 24/CALGreen standards). Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to energy use under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include CALGreen (California Green Building Standards Code – Part 11, Title 24), the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2024–2050 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 3, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as with the Project, Alternative 3 would represent urban infill development within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA), as well as a HQTC, in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with Senate Bill 375 and SCAG's RTP/SCS. As with the Project, Alternative 3 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 3, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search at the NHMLA did not identify any fossil vertebrate localities within the Project Site. Additionally, the Project Site is currently developed and has been previously graded. However, the records search documented significant fossil finds nearby from the same sedimentary deposits that occur within the Project Site, at a depth of 14 feet bgs to depths of at least 40 feet bgs. Further, Qoe, which likely extends to depths of at least 14 feet bgs, may be underlain by older alluvial deposits capable of preserving fossils at 14 feet bgs or greater.

As previously described, while Alternative 3 would reduce the total building area compared to the Project, Alternative 3 would still require the same maximum depth of excavation as the Project (10 feet bgs) and similar amount of grading activities across the Project Site when compared to the Project. As such, Alternative 3 would comply with the same applicable regulatory requirements and implement the same mitigation measures (**GEO-MM-1 and MM-2**) as the Project to address potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 3 would be less than significant after mitigation, and such impacts would be similar when compared to the Project's less-than-significant impacts after mitigation.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As previously discussed, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar. As summarized in Appendix L of this Draft EIR, based on the proposed uses, Alternative 3 would generate three percent less daily vehicle trips and two percent more daily vehicle trips as the Project for Option 1 and Option 2, respectively. Overall, the daily vehicle trips and related VMT would be similar as the Project which would result in similar emissions generated by the Project. As shown in Appendix D (Energy Calculations), of this Draft EIR, electricity and natural gas usage factors for warehouse uses were conservatively calculated as industrial park, which are the same factors as office use. Thus, with a similar overall floor area, both area sources and stationary sources would generate similar operational air emissions compared to the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be similar as the amount generated by the Project. In addition, as with the Project, Alternative 3 would be designed to comply with the requirements of Title 24 and the Los Angeles Green Building Code. Also, as with the Project, this alternative would comply with Project Design Feature GHG-PDF-1 prohibiting the use of natural gas during Project operations for new buildings. Like the Project, Alternative 3 would also increase urban development within SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA), as well as a HQTC, in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle-ready parking, which would all reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

As with the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, would be used and, therefore, would require proper handling, management, and, in some cases, disposal. As discussed for the Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Such impacts would be similar to the Project's less-than-significant impacts. With regard to potential risk of accident or upset conditions,

Alternative 3 would involve the same types of construction activities as the Project with the same potential to encounter the presence of previously unidentified contaminated soil and soil gas beneath the Project Site that could exacerbate risk of upset and accident conditions associated with the release of hazardous materials into the environment. Additionally, the Project Site currently includes HRECs and RECs consisting of existing USTs, current and former hydraulic lifts, and three oil/water clarifiers. As described in Project Design Feature HAZ-PDF-1, removal of these subsurface features is identified as an interim remediation project and all ground disturbance activities would be completed prior to, and independent of Alternative 3. Further, as with the Project, Alternative 3 would comply with all applicable regulatory requirements related to hazards and would implement Mitigation Measure HAZ-MM-1 requiring a SMP for contaminated soils. Thus, similar to the Project, under Alternative 3, potential impacts associated with the release of hazardous materials during upset and/or accident conditions would be less than significant after mitigation. With respect to the Project Site's listing on a hazardous materials site, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in numerous databases reviewed as part of the Phase I, including in Appendix F.1 of this Draft EIR. Implementation of Mitigation Measure HAZ-MM-1 would reduce any potential impacts associated with this case to a less-than-significant level. As with the Project, Alternative 3 would implement this mitigation measure. Thus, similar to the Project, potential impacts associated with listing on a hazardous site would be less than significant after mitigation.

(2) Operation

As with the Project. operation of Alternative 3 would involve the routine use of small quantities of potentially hazardous materials typical of those used in industrial warehouses, including cleaning products, paints, and those used for maintenance of landscaping. As with the Project, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 3 would be handled, used, stored, and disposed of in accordance with manufacturer's standards and all applicable local, state, and federal regulations. Overall, potential impacts associated with hazardous materials use and the resultant potential risk of upset during operation of Alternative 3 would be less than significant. Such impacts would be slightly less when compared to the Project's less-than-significant impacts as a result of the reduced floor area.

g. Land Use and Planning

As described above, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar. Specifically, it would include a reduction of warehouse uses to 208,024 square feet and an increase in office uses to 202,000 square feet, creating a hybrid office and industrial type Alternative when compared to the Project. Additionally, the maximum building height of 46 feet would be the same as it would under Option 2 and would be four feet less than the maximum height of Option 1. Accordingly, the overall FAR and development under

Alternative 3 would be reduced compared to the Project. As with the Project, following approval of the proposed entitlements, Alternative 3 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the General Plan, including the Framework Element, the Mobility Plan, the Conservation Element, Plan for a Healthy Los Angeles, Westchester–Playa del Rey Community Plan, the LAMC, the Los Angeles Coastal Transportation Corridor Specific Plan, and the Citywide Design Guidelines, Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan, and SCAG's 2024–2050 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar when compared to the less-than-significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the grading, excavation, and foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, under Alternative 3, noise levels during maximum activity days, which is used for measuring impact significance, would be similar to those of the Project. As with the Project, Alternative 3 would implement Project Design Feature NOI-PDF-3, which requires the existing masonry wall along the northern and eastern property lines to be retained and/or improved, which would minimize construction noise. Therefore, as with the Project, on-site construction noise impacts under Alternative 3 would be less than significant.

With regard to off-site noise associated with truck travel, Alternative 3 would result in 5,350 cubic yards of soil export and 485 cubic yards of import, similar to that required for Option 1, and less than that required for Option 2. However, the number of haul trips on a peak haul day would be similar under Alternative 3 and both Project Options. Therefore, as with the Project, noise impacts due to off-site construction trucks under Alternative 3 would be less than significant. In addition, to the extent this alternative requires similar off-site improvements as the Project, potential impacts associated with installation of off-site improvements would be less than significant, similar to the Project.

Overall, the construction-related noise impacts of Alternative 3 would be similar to the Project.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include on-site stationary noise sources, including mechanical equipment, parking facilities, and loading docks, and mobile (roadway traffic) noise sources. Alternative 3 would introduce noise from similar on-site noise sources. However, a reduction in the number of loading docks and amount of truck activity would be anticipated under Alternative 3 due to the reduction in industrial uses. In addition, similar to the Project, Alternative 3 would implement Project Design Features NOI-PDF-1 (acoustic screening of mechanical equipment from off-site noise receptors), NOI-PDF-4 (retain and improve the existing masonry wall along the eastern property line), which would minimize on-site operational noise. Like the Project, Alternative 3 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, as summarized in Appendix L of this Draft EIR, based on the proposed uses, Alternative 3 would generate three percent less daily vehicle trips and two percent more daily vehicle trips as the Project for Option 1 and Option 2, respectively. Overall, the daily vehicle trips and related traffic noise would slightly less than the Project. Therefore, off-site noise impacts associated with operation of Alternative 3 would be less than the Project and less than significant impacts.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. On- and off site construction activities and the associated construction-related on- and off-site vibration levels under Alternative 3 would be expected to be similar to those of the Project on peak days.). Accordingly, as with the Project, construction activities under Alternative 3 would result in less than significant on-site and off-site vibration impacts.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the surface parking areas, would not generate perceptible vibration levels at off-site sensitive uses. However, daily vehicle trips would be slightly reduced under Alternative 3. In addition, like the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. As such, vibration impacts associated with operation of Alternative 3 would be less than significant and less than the less than significant impacts of the Project due to the reduction in vehicle trips.

i. Transportation

As previously described, Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar to the Project. Nevertheless, the same transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3. These include the Mobility Plan; Plan for a Healthy Los Angeles; Westchester–Playa del Rey Community Plan; Coastal Transportation Corridor Specific Plan; LAMC; LADOT Vision Zero; and Citywide Design Guidelines; and SCAG's 2020-2045 RTP/SCS. As with the Project, Alternative 3 would not conflict with these plans, policies and regulations. Like the Project, Alternative 3 would intensify urban density within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA) and a HQTC in close proximity to a high-traffic commercial corridor that is well-served by a variety of public transit options. Alternative 3 would also prioritize safety and access for all individuals utilizing the Project Site by complying with all applicable design element requirements, including those related to proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design, which would improve safety, visibility, mobility, and accessibility to reduce, if not totally avoid, any effects to the safety and mobility of all users on-site and on the public ROWs. Furthermore, like the Project, Alternative 3 would promote pedestrian activity and reduce VMT by providing pedestrian and bicycle improvements, TDM measures, and providing public right of way improvements (i.e., new street trees, lighting, bicycle parking and supporting amenities, etc.). Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 3 in this regard would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, as shown in Appendix L of this Draft EIR, Alternative 3 is anticipated to result in an overall net decrease of 1,636 daily trips and a net decrease of 9,242 daily VMT. Accordingly, Alternative 3 would not generate a net increase of 250 or more daily vehicle trips to meet the screening criteria for further VMT analysis as identified in LADOT's *Transportation Assessment Guidelines*.[6] Therefore, under Alternative 3, impacts with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant and similar when compared to the less-than-significant impacts of the Project.

With respect to hazards due to geometric design features, vehicular access to the Project Site under Alternative 3 would be provided via three driveways along West Arbor Vitae Street, and two driveways along South Airport Boulevard and Interceptor Street, similar to Option 2. Similar to the Project, Alternative 3's driveways would provide adequate sight distance for vehicles entering and departing the Project Site, as it would be placed perpendicular to roadways and no unusual or new obstacles would be presented in the design that would be considered hazardous. Additionally, the vehicular driveways would intersect Interceptor Street, South Airport Boulevard and West Arbor Vitae at a right angle to maximize sight distance. In addition, all driveways would have sufficient capacity to accommodate the estimated inbound and outbound traffic volume and, therefore, no hazards would occur related to operation of the driveway. Differing in design from Option 1, Alternative 3 would not require the inclusion of Project Design Feature TR-PDF-2, which includes that the existing traffic signal at the northwestern corner of the Project Site on Interceptor Street to be modified to incorporate the Project driveway to limit potential impediments to traffic flow from trucks exiting the Project Site.

Furthermore, as with the Project, proposed driveways would be designed in compliance with applicable LADOT requirements regarding site access and would not impede access to and from the Project Site. Therefore, hazards due to geometric design features impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to freeway safety, as discussed in Section IV.I, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix I.1 of this Draft EIR, the Project would add fewer than 25 trips to the freeway

[6] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

off-ramps analyzed in both the morning and afternoon peak hours. As Alternative 3 would generate fewer trips than the Project (under Option 1), Alternative 3 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

j. Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no archaeological sites have been previously recorded at the Project Site according to the CHRIS and SLF records searches; LAN-214 is the only archaeological site within a 0.5-mile radius to the Project Site that was at least reported to contain a Native American component and consisted of "chipped stone points" (i.e., lithic projectile points). The Project Site is fully paved and developed with several buildings and the potential for a buried tribal cultural resource is low. Furthermore, consultation with the applicable California Native American Tribes conducted in accordance with AB 52 did not identify any tribal cultural resources on the Project Site.

As previously described, while Alternative 3 would reduce the total building area compared to the Project, Alternative 3 would still require the same maximum depth of excavation as the Project (10 feet bgs) and similar amount of grading activities across the Project Site when compared to the Project. Therefore, the potential for Alternative 3 to uncover a buried tribal cultural resource during construction would be similar the Project (under Option 2). Like the Project, Alternative 3 would implement the City's standard tribal cultural resources COA to address inadvertent discovery of tribal cultural resources. Therefore, impacts with respect to tribal cultural resources would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Energy Infrastructure

(a) Construction

As discussed above, Alternative 3 would result in a similar amount of energy needed for construction activities based on the similar amount of development and duration. As discussed in Section IV.C, Energy, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a similar demand for energy during construction compared to the Project Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity associated with construction of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As previously discussed, the total energy consumption of Alternative 3 would be similar as the Project due to the similar land uses and energy usage factors. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 3. Impacts related to energy infrastructure would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis provided above, Alternative 3 would result in less-than-significant after mitigation impacts associated with hazards and hazardous materials (construction) and paleontological resources that would be similar to the Project's less-than-significant with mitigation impacts.

Alternative 3 would result in similar less-than-significant impacts as the Project with regard to the following topics: conflicts with the applicable zoning and other regulations governing scenic quality; light and glare; air quality (conflicts with plans); air quality (regional emissions – construction and operations), air quality (local emissions – construction and operations) air quality (toxic air contaminants– construction); energy (wasteful, inefficient, or unnecessary consumption of energy resources – construction); energy (conflict with plans for renewable energy or energy efficiency); greenhouse gas emissions; hazards and hazardous materials (operations); land use and planning; noise (construction); transportation (conflicts with transportation plans; VMT; design hazards) and tribal cultural resources.

Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: air quality (toxic air contaminants – operation); energy (wasteful, inefficient, or unnecessary consumption of energy resources – construction or operation); hazard and hazardous materials (operation); noise (operation) and transportation (freeway safety); utilities – energy infrastructure.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would include a reduction of warehouse uses and an increase in office uses compared to the Project with the overall amount of development similar to the Project. Specifically, it would include a reduction of warehouse uses from 355,390 square feet (Option 1) and 320,056 square feet (Option 2) to 208,024 square feet (Alternative 3) and an increase in office uses from 80,000 square feet (Option 1) and 90,000 square feet (Option 2), to 202,000 square feet (Alternative 3). As such, Alternative 3 would somewhat meet the underlying purpose of the Project, which is to redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods

movement and operational logistics strategically located in proximity to LAX and major regional roadways.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives as effectively as the Project:

- Promote local and regional mobility objectives by creating an employment hub in an area served by existing and future transit/rail stations.
- Provide for development that is consistent with the existing zoning and land use designations of the Project Site.
- Advance innovative and sustainable development practices and, where viable, explore and advance the transition toward clean technologies and other transformative technologies.

Alternative 3 would not meet the following objectives to the same extent as the Project due to the overall reduction in the proposed floor area:

- Preserve critically important industrial zoned land strategically located near LAX's cargo service providers and major regional roadways to streamline goods movement.
- Reduce vehicle miles traveled (VMT) by situating an industrial use on an infill site in close proximity to LAX's cargo service providers and major freeways.
- Promote local and regional economic growth by redeveloping the Project Site with an economically viable industrial project that generates new tax revenues, and creates a wide range of jobs, including construction jobs, within Los Angeles.
- Develop a state-of-the-art industrial center with intentional building orientation and design, ensuring compatibility with surrounding uses while optimizing operational logistics.
- Provide an industrial center that incorporates sustainable and green building design and construction to promote resource conservation, including waste reduction, solar, efficient water management techniques, and conservation of energy to achieve a LEED Certification-equivalent building.

V. Alternatives

D. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative, is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes: Alternative 1—No Project Alternative; Alternative 2—Reduced Intensity Alternative; and Alternative 3—Industrial/Office Business Park Alternative. Table V-2 on page V-8 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

As discussed in the impact analyses in this Draft EIR, the Project would not result in significant environmental impacts. Thus, the alternatives analysis focuses on the ability to reduce the impacts that were determined to be less than significant or less than significant with mitigation.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project's impacts (i.e., would avoid the Project's less than significant impacts with mitigation, and less than significant impacts). In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Reduced Project Alternative, would be the Environmentally Superior Alternative. As summarized in Table V-2, this Alternative would reduce more of the Project impacts compared to Alternative 3. However, as described above, due to the reduction in floor area, Alternative 2 would not meet the underlying purpose of the Project to the same extent as the Project, which is redevelop the Project Site with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located in proximity to LAX and major regional roadways.

Alternative 2 would also not meet all of the project objectives to the same extent as the Project due to the overall reduction in the proposed warehouse and office floor area.