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16201-16275 Raymer Street Project

Case Number: ENV-2023-7591-MND

Project Location: 16201, 16215, 16227, 16231, 16239, 16251, and 16275 West Raymer Street, Los Angeles, California, 91406

Community Plan Area: Reseda – West Van Nuys

Council District: 6 — Padilla

Project Description: The applicant is proposing the demolition of approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet. As proposed, the project includes 8,000 square feet of office space, 4,000 square feet of which is proposed as office mezzanine space. The applicant is proposing to provide 62 automobile parking spaces, 26 bicycle parking spaces (12 short-term and 14 long-term), 37,683 square feet of landscaping, and 80,809 square feet of hardscape. Additionally, the project proposes 14 dock high loading doors on the north facing facade. An approximately 8 foot in height screen wall with gates is located at the truck court. Three 24 inch in height retaining curbs are proposed. There are no native protected trees onsite. The proposed project would include the removal of 15 mature, significant non-native trees and 1,500 cubic yards of grading (11,819 cubic yards of cut, 13,319 cubic yards of fill, 1,500 cubic yards of import, no export). The project proposes a total of 97 replacement trees including 15 evergreen shade trees (14 Holly Oak and one Fruitless Olive) in the parking lot.

PREPARED BY:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra

APPLICANT:

16201 Raymer Street, LLC

September 2024

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed 16201-16275 Raymer Street Project (“project”). The proposed project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

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

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	16201-16275 RAYMER STREET PROJECT
ENVIRONMENTAL CASE NO.	ENV-2023-7591-MND
RELATED CASES	DIR-2023-7590-SPR

PROJECT LOCATION	16201-16275 WEST RAYMER STREET
COMMUNITY PLAN AREA	RESEDA – WEST VAN NUYS
GENERAL PLAN DESIGNATION	LIGHT MANUFACTURING
ZONING	M2-1
COUNCIL DISTRICT	6 – PADILLA

LEAD AGENCY	City of Los Angeles
STAFF CONTACT	COURTNEY YELLEN
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APPLICANT	16201 RAYMER STREET, LLC
ADDRESS	C/O LONGPOINT REALTY PARTNERS, LLC 116 HUNTINGTON AVENUE, SUITE 1001 BOSTON, MA 02116
PHONE NUMBER	(562) 895-3392

PROJECT DESCRIPTION

The applicant is proposing the demolition of approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet. As proposed, the project includes 8,000 square feet of office space, 4,000 square feet of which is proposed as office mezzanine space. The applicant is proposing to provide 62 automobile parking spaces, 26 bicycle parking spaces (12 short-term and 14 long-term), 37,683 square feet of landscaping, and 80,809 square feet of hardscape. Additionally, the project proposes 14 dock high loading doors on the north facing facade. An approximately 8 foot in height screen wall with gates is located at the truck court. Three 24 inch in height retaining curbs are proposed. There are no native protected trees onsite. The proposed project would include the removal of 15 mature, significant non-native trees and 1,500 cubic yards of grading (11,819 cubic yards of cut, 13,319 cubic yards of fill, 1,500 cubic yards of import, no export). The project proposes a total of 97 replacement trees including 15 evergreen shade trees (14 Holly Oak and one Fruitless Olive) in the parking lot.

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

ENVIRONMENTAL SETTING

The 240,365 square foot (5.5 acre) project site consists of three contiguous lots located on the northern side of Raymer Street approximately 507 feet west of Woodley Avenue within the Reseda – West Van Nuys Community Plan area. The irregular-shaped project site includes approximately 634 linear feet of frontage along Raymer Street to the south and approximately 637 linear feet along the Metro right-of-way to the north. The Community Plan area designates the project site for Light Manufacturing land use, and the site is zoned M2-1. The project site is located in the Los Angeles State Enterprise Zone (Zoning Information Bulletin ZI-2374) and the MTA Right-of-Way Project Area (Zoning Information Bulletin ZA-1117). Additionally, according to NavigateLA, the project site is located within a Flood Zone C, which indicates the project is located on a site with minimal risk of flooding. Pursuant to LAMC Section 12.21 A.1, the allowable Floor Area Ratio (FAR) for the site is limited to 1.5:1.

The project site is currently developed with four buildings totaling approximately 48,944 square feet of industrial space with associated parking and landscaping. The surrounding area is developed with various light industrial uses to the north, east, west and south. Further west, approximately 500 feet, is the eastern portion of the Van Nuys Airport.

Raymer Street is designated as a Local Street - Standard by the Mobility Plan 2035 with a designated right-of-way width of 60 feet and a designated roadway width of 36 feet. Raymer Street is improved with a sidewalk, curb, and gutter.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Courtney Yellen

PRINTED NAME

Courtney Yellen

SIGNATURE

Planning Assistant

TITLE

9/26/2024

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The applicant is proposing the demolition of approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet. As proposed, the project includes 8,000 square feet of office space, 4,000 square feet of which is proposed as office mezzanine space. The applicant is proposing to provide 62 automobile parking spaces, 26 bicycle parking spaces (12 short-term and 14 long-term), 37,683 square feet of landscaping, and 80,809 square feet of hardscape. Additionally, the project proposes 14 dock high loading doors on the north facing façade. An approximately 8 foot in height screen wall with gates is located at the truck court. Three 24 inch in height retaining curbs are proposed. There are no native protected trees onsite. The proposed project would include the removal of 15 mature, significant non-native trees and 1,500 cubic yards of grading (11,819 cubic yards of cut, 13,319 cubic yards of fill, 1,500 cubic yards of import, no export). The project proposes a total of 97 replacement trees including 15 evergreen shade trees (14 Holly Oak and one Fruitless Olive) in the parking lot.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

As shown in **Figure 1**, the project site is located on three contiguous parcels (APN 2205-029-800, 2205-029-801) totaling 240,365 square feet (5.5 acres) at 16201 to 16275 West Raymer Street, on the northern side of Raymer Street within the Reseda – West Van Nuys Community Plan Area. The project site is located approximately 507 feet west of Woodley Avenue and approximately 500 feet east of the Van Nuys Airport. Regional vehicle access to the site can be taken from the I-405 (San Diego Freeway) via Roscoe Boulevard.



Figure 1. Aerial View of the Project Site

3.2.2 Existing Conditions

The project site is currently developed with approximately 48,944 square feet of industrial space with associated surface parking and landscaping. The 48,944 square feet of industrial space consists of four buildings all proposed for removal including any concrete, foundational pads. The project site includes approximately 634 linear feet of frontage along Raymer Street and approximately 637 linear feet along the Metro right-of-way.

As shown in **Figure 2**, the project site is located within the Reseda – West Van Nuys Community Plan area of Los Angeles and is designated as Light Manufacturing by the Community Plan and zoned M2-1. Warehouse uses are permitted in the M2 Zone pursuant to LAMC Section 12.19. The project site is located in the Los Angeles State Enterprise Zone (Zoning Information Bulletin ZI-2374) and the MTA Right-of-Way Project Area (Zoning Information Bulletin ZA-1117). Additionally, the project site is located in an Airport Hazard area with a height limit of 940 feet above median sea level and an Urban Agricultural Incentive Zone. The project site is not within any FEMA special flood hazard areas.

Raymer Street is designated as a Local Street - Standard by the Mobility Plan 2035 with a designated right-of-way width of 60 feet and a designated roadway width of 44 feet. Raymer Street is improved with a sidewalk, curb, and gutter.

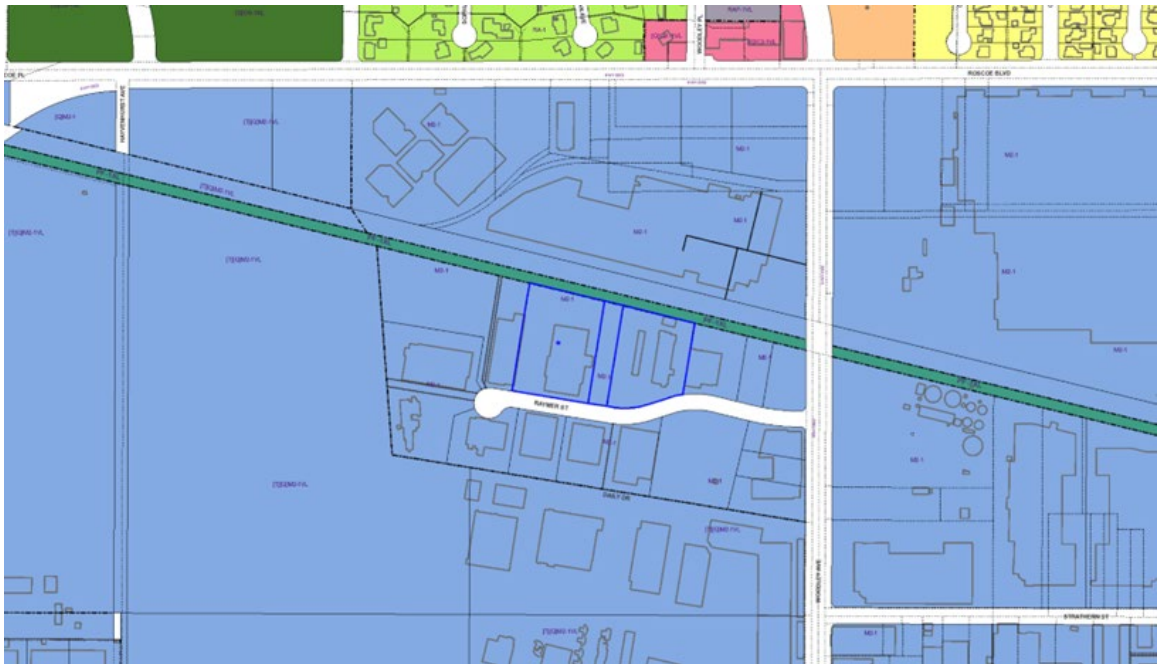


Figure 2. ZIMAS Map

3.2.3 Surrounding Land Uses

Surrounding sites to the north, east, west and south are developed with light industrial uses with the exception of the Van Nuys Airport further south and west of the project site and the Metro right-of-way that runs east and west along the northern property line of the subject site. The abutting sites to the east, west and south are zoned M2-1 and designated for Light Manufacturing. The sites to the west and south are developed with two story supply stores while the site located to the east is developed with a used car dealership/lot. Further west, approximately 500 feet from the project site, sites are zoned [T][Q]M2-1VL and designated for Light Manufacturing land use. These sites are developed as part of the Van Nuys Airport. The abutting site along the northern property line is zoned PF-1XL and designated for Public Facilities land use. The site is developed with the Metro right-of-way and serves as a buffer for the Metro that runs east and west through the northeast portion of the Reseda – West Van Nuys Community Plan. Further north, sites are zoned [T][Q]M2-1VL and M2-1 and designated for Light Manufacturing land use. The sites just north of the metro right-of-way are developed with the Metro’s rail route and further north developed with various industrial uses.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The applicant is proposing the demolition of approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet.

As proposed, the project includes 8,000 square feet of office space, 4,000 square feet of which is proposed as office mezzanine space. The applicant is proposing to provide 62 automobile parking spaces, 26 bicycle parking spaces (12 short-term and 14 long-term), 37,683 square feet of landscaping, and 80,809 square feet of hardscape. Additionally, the project proposes 14 dock high loading doors on the north facing façade. An approximately 8 foot in height screen wall with gates is located at the truck court. Three 24 inch in height retaining curbs are proposed. There are no native protected trees onsite. The proposed project would include the removal of 15 mature, significant non-native trees and 1,500 cubic yards of grading (11,819 cubic yards of cut, 13,319 cubic yards of fill, 1,500 cubic yards of import, no export). The project proposes a total of 97 replacement trees including 15 evergreen shade trees (14 Holly Oak and one Fruitless Olive) in the parking lot.

An approximately 8 foot in height inverted U-shaped screen wall with gates is located at the truck court. The screen wall abuts the 16 foot 6 inch easement at the northernmost property line and extends to the southern boundary of the 20 foot fire access lane. To provide fire access, the screen wall is broken by approximately 8 foot in height painted steel rolling gates. The gates provide vehicular access as well as a designated pedestrian access gate.

As previously stated, the applicant's plans show three 24 inch in height retaining curbs. One retaining curb is located at the northeastern portion of the site to accommodate changes in grade. The other two retaining curbs abut the 16 foot 6 inch easement to the north to protect power poles.

Pursuant to Chapter 1 of the LAMC Section 12.19, light industrial uses in the M2 Zone are not required to maintain a front, side or rear yard setback. However, the building would incorporate a landscaped variable front yard setback of 32 feet from the southern property line along Raymer Street, with the most narrow portion of the setback at the center of the building's frontage. Additionally, the project proposes to locate the building 83 feet from the rear property line, a variable width of 58 feet to 89 feet nine inches from the west property line, and a variable width of 64 feet 11 inches to 86 feet from the east property line. The project proposes a 17 foot landscape buffer along the rear property line as well as variable landscape buffers along the south, east and west property lines.

Regarding bulk, the building's design addresses massing in a number of ways, such as building/facade articulation, materials, colors and landscaping to establish a pedestrian-oriented activation along Raymer Street. As shown on the applicant's plans, the proposed floor area of the building is 123,464 square feet with an FAR of 0.52:1, which is within the maximum allowable floor area ratio of 1.5:1. The proposed building is a single story with partial mezzanine and a maximum height of 52 feet in a zone that allows unlimited height and stories.

Pursuant to LAMC Section 12.21 A.4, the project is required to provide a minimum of 57 parking spaces. As proposed, the project will provide 62 vehicle parking spaces. In addition, pursuant to LAMC Section 12.21 A.16(a)(1)(i), the project is required to provide 26 bicycle parking spaces (12 short-term and 14 long-term). As proposed, the project will provide 12 short-term and 14 long-term bicycle spaces.

3.3.2 Design and Architecture

The proposed building incorporates architectural features which are a modern contemporary industrial concrete tilt-up design utilizing a combination of materials including but not limited to glazing, aluminum trim, steel, and glass and colors consisting of cool tones of white, gray, blue and butterfield. The south elevation fronting on Raymer Street extends for approximately 482 feet and is modulated into segments with alternating parapet heights (with a proposed maximum height of 52 feet), canopies, panels that incorporate horizontal and vertical window elements, and double-height storefront systems.

3.3.3 Open Space and Landscaping

Pursuant to LAMC Section 12.42 B.2 and Ordinance No. 170,978 (Landscape Ordinance), the proposed surface parking lot is subject to the City of Los Angeles Landscape Guidelines to provide one tree for every four parking stalls, resulting a total of 15 trees within the parking lot. The proposed project provides a total of 62 parking spaces and proposes a total of 15 trees of 24-inch box size evergreen shade trees (14 Holly Oak and one Fruitless Olive) within the parking lot. The project proposes to provide a variable 32 feet of landscaping along the front property line, a 17 foot landscape buffer along the rear property line, and landscaping of variable dimensions along the east and west property line. The project proposes a total of 37,683 square feet of landscape area (approximately 16%) of various grasses, shrubs, and trees.

There are currently 15 trees on the project site. There are no native, protected trees on site. The project proposes the removal of all 15 mature, significant non-native trees. The applicant is proposing a total of 97 replacement trees including London Plane, Holly Oak, Fruitless Olive, Australian Willow, Brisbane, and Italian Cypress and shrubs including Purple Hopseed Bush, Coast Rosemary, Texas Privet, Texas Ranger, and Little Ollie Dwarf Olive according to their landscape plan.

3.3.4 Access, Circulation, and Parking

The project is located on the northern side of Raymer Street. Raymer Street is designated Local Street - Standard by the Mobility Plan 2035 with a designated right-of-way width of 60 feet and a designated roadway width of 36 feet. Raymer Street is improved with a curb, gutter, and sidewalk.

Vehicular access to the site is provided via two existing 40 foot wide driveways on the southeastern and southwestern portion of the subject site along Raymer Street. The driveways lead to the 14 loading dock doors and the rear portion of the lot with parking located along the east and west portions of the subject site. The main pedestrian entrance is proposed to be located at the southeast corner of the building, leading to the building's ancillary office space, with a secondary pedestrian entrance to the building located at the southwest corner. As proposed, both pedestrian entrances would have direct access to the public sidewalk along the Raymer Street frontage.

The truck court/loading dock areas are proposed to be 130 feet in width to allow for truck and vehicle circulation. Truck loading operations would occur along the north elevation of the building in a secure area with the 14 dock high doors screened from public view. Drive aisle areas are proposed to be 40 feet wide. The truck court/loading dock area is designed with a pedestrian access gate. No trailer parking is proposed onsite.

Pursuant to LAMC Section 12.21 A.4, the project is required to provide a minimum of 57 parking spaces. As proposed, the project will provide 62 vehicle parking spaces. In addition, pursuant to LAMC Section 12.21 A.16(a)(1)(i), the project is required to provide 26 bicycle parking spaces (12 short-term and 14 long-term). As proposed, the project will provide 12 short-term and 14 long-term bicycle spaces.

3.3.5 Sustainability Features

The Green Code and Title 24 apply to the project. As shown on the applicant's plans, the project is providing 3 EV capable stalls with EVSE, 8 EV capable stalls without EVSE, and a van accessible EV capable stall with EVSE. The project will be reviewed for compliance by the Bureau of Sanitation and the Los Angeles Department of Building and Safety.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to the Los Angeles Municipal Code (LAMC) Section 16.05 C, a Site Plan Review for a development project which creates or results in an increase of 50,000 gross square feet or more of non-residential floor area.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

No Impact. A significant impact would occur if the proposed project would have a substantial adverse effect on a scenic vista or if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The project site is located within a fully developed area of the Reseda – West Van Nuys Community Plan. There are no designated scenic vistas identified in the Reseda – West Van Nuys Community Plan. Views from the project site are limited by the relatively undifferentiated and flat topography of the area and the industrial and commercial development lining the surrounding major street corridors. Distant views of the Verdugo Hills and Santa Monica

Mountains are available from nearby Woodley Avenue, looking to the north and south, respectively. However, given the topography of the surrounding area, panoramic views from local streets are obstructed by intervening buildings near the project site. Additionally, the project site is currently developed with four industrial warehouses that are proposed for demolition. Development of the proposed project would result in an incremental intensification of existing prevailing land uses in an already urbanized area of Los Angeles. Furthermore, development of the project and related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway.

According to the California Department of Transportation California Scenic Highway Map, the project site is not located along or within a state scenic highway. Therefore, there would be no impact to scenic resources within a state scenic highway and no mitigation measures are required herein.

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

Less Than Significant With Mitigation. A significant impact would occur if the proposed project would have a substantial adverse effect on the existing visual character or quality of public views of the site and its surroundings. Public views are those that are experienced from a publicly accessible vantage point.

As mentioned previously, the project is located in a highly urbanized area in the Reseda – West Van Nuys Community Plan. The proposed project is designed to materials and colors that will enhance the surrounding area, including glazing, aluminum trim, steel, and glass and colors consisting of cool tones of white, gray, blue and butterfield. The south elevation fronting on Raymer Street extends for approximately 482 feet, and is modulated into segments with alternating parapet heights (with a proposed maximum height of 52 feet), canopies, panels that incorporate horizontal and vertical window elements, and double-height storefront systems.

As shown on the applicant's plans, as required by the Code, and as further mitigated herein, the project will include landscaping improvement to enhance the visual quality of the area. Pursuant to LAMC Section 12.42 B.2 and Ordinance No. 170,978 (Landscape Ordinance), the proposed surface parking lot is subject to the City of Los Angeles Landscape Guidelines to provide one tree for every four parking stalls, resulting a total of 15 trees within the parking lot. The proposed project provides a total of 62 parking spaces and proposes a total of 15 trees of 24-inch box size evergreen shade trees (14 Holly Oak and one Fruitless Olive) within the parking lot. The project proposes to provide a variable 32 feet of landscaping along the front property line, a 17 foot landscape buffer along the rear property line, and landscaping of variable dimensions along the east and west property line. The project proposes a total of 37,683 square feet of landscape area (approximately 16%) of various grasses, shrubs, and trees.

There are currently 15 trees on the project site. There are no native, protected trees on site. The project proposes the removal of all 15 mature, significant non-native trees. The applicant is proposing a total of 97 replacement trees including London Plane, Holly Oak, Fruitless Olive, Australian Willow, Brisbane, and Italian Cypress and shrubs including Purple Hopseed Bush, Coast Rosemary, Texas Privet, Texas Ranger, and Little Ollie Dwarf Olive according to their landscape plan.

Taken together, the design features, proposed landscaping, and landscaping improvements as mitigated herein will enhance the visual quality of the area. Therefore, the proposed project would result in less than significant impacts on visual quality as mitigated herein.

Mitigation Measure AES-1: Landscape Plan. Environmental impacts to the character and aesthetics of the neighborhood may result from project implementation. However, the potential impacts will be mitigated to a less than significant impact with the following measure:

- All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

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

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

Construction

While the majority of the proposed project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours subject to days and hours as allowed under LAMC Section 41.40 and as regulated by the LADBS. Construction during evening hours would require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as part of the project, construction lighting would be shielded such that no light source can be seen from

adjacent residential properties. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare 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, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the project site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary project construction would not substantially alter the character of off-site areas surrounding the project site or adversely impact day or nighttime views in the area.

Operation

The project would develop the site with an approximately 123,464 square foot single story industrial warehouse facility. The project would include site lighting consisting of LED lighting with a one foot candle minimum. Pursuant to Chapter 9 of the LAMC Section 93.0117 no light source may cause more than two foot candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. As proposed, the project would not cause a significant impact in regard to light or glare on the surrounding area.

All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. In compliance with all applicable LAMC standards, exterior lighting on the project site would not illuminate adjacent properties.

No signage, other than interior wayfinding and directional signage and associated lighting, has been proposed or approved herein. Any new street and/or pedestrian lighting within the public right-of-way shall be submitted and approved by the Bureau of Street Lighting.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the project would occur during periods in which the sun is low on the horizon and when the point of reflection within the project site is in front of the driver, in the direction of travel. The project would feature a variety of surface materials, including glass, concrete, and metal. Glass used as part of the project is proposed as non-glare by using high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. In addition, landscape and street scape elements are incorporated into the project design to further reduce and block glare.

Nighttime glare could result from illuminated signs and vehicle headlights. No signage, other than interior wayfinding and directional signage and associated lighting, has been proposed herein. Furthermore, while headlights from vehicles entering and exiting the parking levels on the ground

floor would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

With Code requirements, there are expected to be less than significant impacts due to a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use. No Farmland, agricultural uses, or related operations are present within the project site or surrounding area. Due to its urban setting, the project site and surrounding area are not included in the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

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

Less than Significant Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The proposed project site is designated as Light Manufacturing and zoned M2-1. Although agricultural uses are allowed on the site under the current zoning, the site is not specifically zoned for agricultural use and there are no agricultural uses currently existing on the site. ZIMAS shows that the project site is designated as an Urban Agriculture Incentive Zone however, the site is fully developed with industrial uses and associated parking and no agricultural uses are proposed as part of the project.

Additionally, according to the State's most recent Williamson Act land data, neither the proposed project site nor the surrounding area is under a Williamson Act contract. Therefore, impacts would be less than significant, and no mitigation measures are required herein.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. Accordingly, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. Accordingly, the proposed project would not conflict with forest

land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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

Less than Significant Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. The project site does not contain farmland, forestland, or timberland.

The proposed project site is designated as Light Manufacturing and zoned M2-1. Although agricultural uses are allowed on the site under the current zoning, the site is not specifically zoned for agricultural use and there is no farmland, forestland, or timberland currently existing on the site. ZIMAS shows that the project site is designated as an Urban Agriculture Incentive Zone however, the site is fully developed with industrial uses and associated parking and no agricultural uses are proposed as part of the project.

As such, the proposed project would not result in the conversion of existing farmland, agricultural uses, or forest land to non-agricultural or non-forest use. Therefore, impacts would be less than significant, and no mitigation measures are required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact may occur if a project would be inconsistent with the applicable Air Quality Management Plan (AQMP) and would interfere with its air quality goals, including the attainment of air quality standards or interim emissions reductions.

Regulatory Setting

South Coast Air Quality Management District

The proposed project is located within the 6,745-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain California Ambient Air Quality Standards (CAAQS) established by the California Air Resources Board (CARB) and National Ambient Air Quality Standards (NAAQS) established by the United States Environmental Protection Agency (USEPA).

2022 Air Quality Management Plan

SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It utilizes emissions forecasts that rely on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

- Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.
- Goal 4:** Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.

Threshold (a) Analysis

SCAQMD 2022 AQMP and SCAG 2020-2045 RTP/SCS Consistency

The following analysis addresses the proposed project's consistency with the SCAQMD's 2022 AQMP and SCAG's latest 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP's projections for achieving state federal air quality goals are based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS, which are themselves largely based on growth forecasts from local governments like the City of Los Angeles. Therefore, a project is consistent with the 2022 AQMP, in part, if it is consistent with the 2020-2045 RTP/SCS's population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

First, the project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. The project site is zoned M2-1, which permits industrial warehouse uses. Therefore, RTP/SCS assumptions about employment growth in the City account for land uses such as the proposed project on the project site.

Second, development of the project would also be consistent with land use patterns and smart growth policies regarding Priority Growth Areas (PGAs). As noted earlier, PGAs such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the SCAG region's total land area, but the 2020-2045 RTP/SCS anticipates that 74 percent of new employment growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, leveraging transit investments, and conserving the region's resource areas. Thus, the 2020-2045 RTP/SCS emphasizes new infill development in PGAs – especially higher intensity infill projects

that replace low-intensity uses – and assumes a significant increase in employment density in such locations. Projects fitting this land use pattern are consistent with the 2020-2045 RTP/SCS. The project site is located in an HQTa and would likely increase employment density at the site, as the project would demolish approximately 48,944 square feet of light industrial space to construct a 123,464 square-foot warehouse building, more than doubling the site’s operational square footage.

Given these considerations, the proposed project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals. As such, the proposed project would not result in growth - or accompanying emissions - that are unaccounted for by the 2020-2045 RTP/SCS and by extension the 2022 AQMP. Project’s that are consistent with the 2020-2045 RTP/SCS are part of the regional solution for meeting the 2022 AQMP’s air pollution reduction goals. The proposed project would not have a significant long-term impact on the region’s ability to meet state and federal air quality standards.

City of Los Angeles General Plan Air Quality Element Policies

The City of Los Angeles General Plan Air Quality Element also identifies goals and objectives related to advancing the City’s clean air goals. As shown below in **Table 1, Project Consistency with City of Los Angeles General Plan Air Quality Element**, the Project would be consistent with the applicable objectives and goals of the City’s Air Quality Element.

Table 1
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Goal 1 – Good air quality and mobility in an environment of continued population growth and healthy economic structure.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards. And as discussed further below, construction and operation of the Project would not result in exceedances of ambient air quality standards and thresholds.
Objective 1.1 – It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	Consistent – As explained above, the Project would not interfere with SCAQMD’s 2022 AQMP and would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards.
Objective 1.3 – It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	Consistent – The Project would minimize its fugitive dust particulate emissions via compliance with SCAQMD rules. The Project would not include the development of unpaved roads or parking lots.
Goal 2 – Less reliance on single-occupant vehicles with fewer commute and non-work trips.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility and reduce reliance on

Table 1
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	single-occupant vehicle trips. The Project's location within a HQTAs would promote the use of alternative transportation modes.
Objective 2.1 – It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	Consistent – As explained above, the Project would not interfere with SCAQMD's 2022 AQMP and would be consistent with the latest land use and transportation planning strategies to reduce VMT while improving mobility and advancing attainment of state and federal air quality standards.
Objective 2.2 – It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	Consistent – The Project's location within a HQTAs would promote the use of alternative transportation modes.
Objective 3.1 – It is the objective of the City of Los Angeles to increase the portion of work trips made by transit to levels that are consistent with the goals of the AQMP and the Congestion Management Plan.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies to promote use of alternative transportation modes, including transit.
Objective 3.2 – It is the objective of the City of Los Angeles to reduce vehicle traffic during peak periods.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies that emphasize use of alternative transit modes and reduce VMT, which reduces vehicle traffic.
Goal 4 – Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards.
Objective 4.1 – It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	Consistent – The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Objective 4.2 – It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.	Consistent – As explained above, the Project would be consistent with the latest land use and transportation planning strategies to reduce VMT. The Project's location within a HQTAs would promote the use of alternative transportation modes.
Objective 4.3 – It is the objective of the City of Los Angeles to ensure that land use plans separate major sources of air pollution from	Consistent – The Project does not propose a major source of air pollution. The Project's air quality impacts are analyzed in this document, and all Project impacts with respect to air

Table 1
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
sensitive receptors such as schools, hospitals, and parks.	quality – including impacts on nearby sensitive receptors – would be less than significant.
Goal 5 – Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	Consistent – As explained, the Project would be consistent with the latest land use and transportation planning strategies to reduce VMT and corresponding fossil fuel use. The Project would be designed to meet the applicable requirements of the State’s Green Building Standards Code and the City’s Green Building Code.
Objective 5.2 – It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	Consistent – As noted above, the Project would be designed to meet the applicable requirements of the State’s Green Building Standards Code and the City’s Green Building Code.
<i>Source: NTEC, 2023.</i>	

Therefore, the project would not obstruct implementation of the 2022 AQMP or the City’s air quality efforts outlined in its Air Quality Element of the General Plan and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would result in, or substantially contribute to, an exceedance of federal or State criteria pollutant ambient air quality standards.

Regulatory Setting

Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the USEPA is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

The CAA governs the establishment, review, and revision, as appropriate, of the NAAQS which provide protection for the nation’s public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants:

carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), sulfur dioxide (SO₂), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and lead.

California Clean Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the CAAQS. The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}.

Methodology

The following analysis focuses on the potential change in air quality conditions that could result from the proposed project's construction- and operations-related air pollutant emissions. Specific methodologies used to evaluate these emissions are discussed below. **(See Appendix A – Air Quality and Greenhouse Gases Appendix)**

Construction Emissions

Construction of the proposed project could affect local and regional air quality due to the use of gasoline and diesel-powered construction equipment, as well as the generation of construction vehicle trips. It is important to consider that construction emissions can vary substantially from day to day depending on levels of construction activity, the specific types of construction activities taking place, and the types of vehicles/equipment in use. For dust, the prevailing weather conditions can influence emissions.

Based on the criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if its regional emissions

from both direct and indirect construction sources would exceed the threshold levels shown in **Table 2, SCAQMD Construction Emissions Thresholds**.

SCAQMD localized significance thresholds (LSTs) are also included below in **Table 2, SCAQMD Construction Emissions Thresholds**. LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. LSTs are developed based on the ambient concentrations of a given pollutant for a source receptor and distances to the nearest sensitive receptor. The SCAQMD provides LSTs for NO_x, CO, PM₁₀, and PM_{2.5}. The SCAQMD does not provide a LST for SO₂ because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant. Additionally, because VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. However, due to the role that VOCs play in O₃ formation and their classification as a precursor pollutant, a regional emissions threshold has been established. LSTs for the project were obtained via the SCAQMD's mass rate look-up tables (LST Methodology Appendix C – Mass Rate LST Look-Up Table). LSTs for a one-acre project size were utilized, based on the SCAQMD's guidance regarding daily grading acreage. In short, the analysis assumes that a maximum one-acre of ground disturbance would occur daily. This is a conservative assumption and results in the application of the most conservative LSTs. LSTs also conservatively assume a 25-meter (approximately 82 feet) receptor distance, despite the fact that the nearest sensitive receptors are residential land uses located approximately 800 feet north of the project site along Roscoe Boulevard.

Construction emissions were estimated using the CalEEMod version 2022 model. Because the SCAQMD's regional and localized significance thresholds for construction emissions are representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the analysis is to determine whether the project's maximum single-day construction emissions would have the potential to exceed these thresholds. As such, the CalEEMod analysis relies on conservative construction and phasing/overlap assumptions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely, even within the same construction phase or subphase. This analytical approach therefore minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds. The likelihood that the maximum daily construction emissions estimated by this analysis would occur on a given construction workday is low; the likelihood that they would occur every day for the duration of a construction phase is zero.

Table 2
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized ^A
Volatile Organic Compounds – VOCs	75	-
Nitrogen Oxides - NO _x	100	103
Carbon Monoxide – CO	550	426
Sulfur Oxides - SO _x	150	-
Respirable Particulates – PM ₁₀	150	4
Fine Particulates – PM _{2.5}	55	3
^A Localized significance thresholds assumed the following: • 1-acre project size. This is the smallest project size used for analysis in the LST guidance document and is consistent with the SCAQMD's "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" document. Utilizing a 1-acre project size for construction results in the most stringent emissions thresholds. • Receptor distance of 25 meters (approximately 82 feet). This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds. • The project is located in SRA No. 6, "West San Fernando Valley." Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.		

The modeling also accounts for SCAQMD Rule 403 for fugitive dust. SCAQMD Rule 403 contains general requirements applicable to all fugitive dust sources, including the project's construction, that involve minimizing visible emissions and reducing trackout from site driveways. SCAQMD Rule 403(d)(2) requires all sources to implement "best available control measures" ("BACMs") for fugitive dust. The BACMs, which are included in Table 1 of the regulation, require sources to adopt measures such as pre-watering soils prior to cut and fill activities, stabilizing soils during and after cut and fill activities, and stabilizing disturbed soils with water or other stabilizing agents to prevent the generation of visible dust plumes. Thus, the project's fugitive dust reduction procedures would not be required, conducted, or enforced pursuant to any CEQA mitigation: these procedures would be mandatory as a matter of CEQA Rule 403 compliance.

Operational Emissions

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Regional thresholds and LSTs for project operations are shown below in **Table 3, SCAQMD Operational Emissions Thresholds**. Operational emissions for the Project were also calculated using CalEEMod version 2022.

Table 3
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Operational Emissions (lbs per day)	
	Regional	Localized ^A
Volatile Organic Compounds - VOCs	55	-
Nitrogen Oxides - NO _x	55	221
Carbon Monoxide – CO	550	1,158
Sulfur Oxides - SO _x	150	-
Respirable Particulates – PM ₁₀	150	3
Fine Particulates – PM _{2.5}	55	2
^A Localized significance thresholds assumed the following: • 5-acre project size. This is consistent with the project site's approximately 5.5-acre size. • 25-meter (82-foot) receptor distance. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds. As noted earlier, the closest sensitive receptors are residential land uses located approximately 800 feet north of the Project site along Roscoe Boulevard. • The project is located in SRA No. 6, "West San Fernando Valley." Sources: SCAQMD, Air Quality Significance Thresholds, revised March 2023; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.		

Threshold (b) Analysis

Construction Emissions

Construction of the proposed project is expected to begin in Fall 2024 and would last approximately 11 months. Construction would involve demolishing the site's four existing buildings (approximately 48,944 square feet of industrial space) with associated parking and landscaping, grading the site, then constructing the proposed warehouse facility and related infrastructure (e.g., surface parking lot, utility connections, etc.). The project's construction activities were grouped into the following phases for CalEEMod emissions modeling:

- Demolition
- Grading
- Building Construction
- Paving
- Architectural Coating

The project's unmitigated maximum daily regional and local emissions from these construction phases, as estimated using the CalEEMod version 2022 model, are shown below in **Table 4, Maximum Regional and Localized Daily Construction Emissions (Unmitigated)**. Regional thresholds and LSTs for each air pollutant are also shown for comparison. The estimated emissions fully account for the potential for overlapping phases of construction, such as the overlap of building construction and architectural coatings. As shown, the project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for

VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Local emissions also would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, neither the project's regional nor localized construction emissions would cause or substantially contribute to exceedances of federal or State criteria pollutant ambient air quality standards.

Table 4
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Emissions						
2024	3.19	35.5	36.5	0.09	4.55	1.96
2025	27.4	21.0	31.4	0.05	2.04	1.07
Maximum Regional Emissions	27.4	35.5	36.5	0.09	4.55	1.96
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
Demolition	3.00	27.6	32.5	0.05	1.54	1.35
Grading	1.98	18.8	21.1	0.03	2.72	1.70
Building Construction (2024)	1.30	12.2	14.2	0.03	0.54	0.49
Building Construction (2025)	1.21	11.3	14.1	0.03	0.47	0.43
Paving	2.18	7.45	9.98	0.01	0.35	0.32
Architectural Coating	23.67	1.18	1.52	<0.01	0.04	0.03
Overlap of Building Construction (2025), Paving, and Architectural Coating	27.06	19.93	25.6	0.04	0.86	0.78
Maximum Localized Emissions	27.06	27.6	32.5	0.05	2.72	1.70
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	-	No	No	-	No	No
<i>Source: NTEC, 2023.</i>						

Operational Emissions

Emissions associated with the project's operations were also calculated using CalEEMod version 2022. As shown below in **Table 5, Regional and Localized Operational Emissions**, the project would not result in major sources of air pollution. The project's maximum daily emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would they exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, neither the project's regional nor localized operational emissions would cause or substantially contribute to exceedances of federal or State criteria pollutant ambient air quality standards.

Table 5
Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	1.02	0.87	9.00	0.02	1.88	0.49
Area	3.85	0.05	5.37	<0.01	0.01	0.01
Energy	0.04	0.67	0.56	<0.01	0.05	0.05
Regional Emissions: ^A	4.91	1.54	14.9	0.03	1.95	0.55
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Thresholds?	No	No	No	No	No	No
Localized Emissions:	3.89	0.72	5.93	<0.01	0.06	0.06
Localized Significant Thresholds	-	221	1,158	-	3	2
Exceed Threshold?	-	No	No	-	No	No
<i>Note:</i> ^A Some emissions may not add up due to rounding and differences between summer and winter emissions.						
Source: NTEC, 2023.						

Therefore, the project would not result in cumulatively (or individually) considerable increases in criteria pollutant emissions that would contribute to exceedances of ambient air quality standards and the impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project would expose sensitive receptors to substantial criteria pollutant concentrations that would present a public health concern.

Criteria Pollutant Emissions

Construction Emissions

As demonstrated above under threshold (b), the project's construction-related emissions would not exceed SCAQMD regional significance thresholds or LSTs, meaning that the project would not cause or contribute considerable to substantial criteria pollutant concentrations that would present a public health concern. As noted earlier, the nearest sensitive receptors are residential land uses located along Roscoe Boulevard, approximately 800 feet north of the project site. The analysis demonstrated that the project's construction emissions, even when evaluated at a conservative 25-meter (approximately 82 feet) distance, would not result in substantial pollutant concentrations of criteria pollutants.

Operational Emissions

Similarly, the analysis conducted pursuant to threshold (b) demonstrated that the project's operational emissions also would not exceed SCAQMD regional significance thresholds or LSTs, meaning that the project's long-term emissions of criteria pollutants from operations would not cause or contribute considerably to substantial criteria pollutant concentrations that would present a public health concern. The analysis demonstrated that the project's operational emissions, even

when evaluated at a conservative 25-meter (approximately 82 feet) distance, would not result in substantial pollutant concentrations of criteria pollutants.

Toxic Air Contaminant Emissions

Potential Toxic Air Contaminant (TAC) impacts are evaluated by conducting a qualitative analysis consistent with CARB's *Air Quality and Land Use Handbook*, followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis primarily consists of reviewing projects to identify new or modified TAC emissions sources and assessing the distances and other relationships between the TAC sources and nearby sensitive receptors. If the qualitative evaluation does not rule out significant impacts from a new or modified TAC emissions source, a more detailed analysis is conducted. The SCAQMD has established the following thresholds for TACs:

- Maximum Incremental Cancer Risk ≥ 10 in 1 million
- Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)
- Chronic and Acute Hazard Index ≥ 1.0

Construction Emissions

The primary TAC that would be generated by the project's construction activities is diesel particulate matter (diesel PM), which would be emitted from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day would contract cancer based on standard risk-assessment methodology. However, the anticipated duration of the project's construction activities is only approximately 11 months, and daily diesel PM emissions would vary considerably day by day, and by phase, over this duration. As shown earlier, the project's maximum daily PM emissions, which include diesel PM, would not exceed applicable regional thresholds and the most conservative LSTs. And as explained previously, the maximum daily construction emissions are conservative estimates that are not likely to occur on a given construction workday, let alone every day for the entirety of construction. Further, the nearest sensitive receptors – residential land uses along Roscoe Boulevard – are located approximately 800 feet north of the project and over 1,000 feet from the center of its construction activity. Given these considerations, the project's construction would not expose sensitive receptors to substantial diesel PM concentrations.

Operational Emissions

According to CARB, sensitive receptors within 1,000 feet of distribution centers (such as warehouses) that accommodate more than 100 trucks per day may be exposed to hazardous diesel PM concentrations, and sensitive receptors within approximately 750 feet of such distribution centers may be exposed to potential cancer risks in excess of ten in one million. These distances are measured from the center of the distribution center. Though the project proposes a warehouse use that could house distribution facilities, the nearest sensitive receptors along Roscoe Boulevard are located over 1,000 feet from the center of the project site, outside the radius established by CARB. Further, the project would not accommodate the level of truck activity (100 trucks per day) that CARB associates with hazardous diesel PM concentrations within this radius. The project would include just 14 loading bays, so it is unlikely that the project would accommodate even half the 100 trucks per day activity level identified by CARB. Given

these considerations, the project's operations would not expose sensitive receptors to substantial diesel PM concentrations.

With regard to CO hotspots, the project's traffic generation would not result in exceedances of CO air quality standards along nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. CO levels in the project are well-below federal and state standards, as are CO levels in the air basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the air basin is currently designated as a CO attainment area for both NAAQS and CAAQS. Third and lastly, the project is estimated to result in just 177 net new vehicle trips per day. This is a nominal increase that would not contribute to the levels of traffic and congestion necessary to result in CO hotspots. Therefore, the project's operations would not expose sensitive receptors to substantial CO concentrations as a result of CO hotspots.

Therefore, neither the proposed project's construction nor its operations would expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would expose a substantial number of sensitive receptors to objectionable odors.

No other emissions, including objectionable odors, would be anticipated as a result of the construction or operations of the project. Project construction would involve the use of conventional building materials typical to construction projects of similar type and size. Any odors generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of sensitive receptors, especially given the fact that the nearest residential land uses are located approximately 800 feet north of the project along Roscoe Boulevard. Regarding operations, the project proposes the construction of a concrete tilt up warehouse for light industrial, light manufacturing, or other conforming uses. The types of land uses that would be accommodated by the project are not frequently associated with odor complaints (e.g., agricultural uses, wastewater treatment facilities, food processing facilities, etc.) or other harmful emissions. As a result, the project would not be expected to result in objectionable odors adversely affecting a substantial number of sensitive receptors. According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed land uses would not result in activities that create objectionable odors.

Therefore, neither the project's construction nor its operations would result in other emissions, such as objectionable odors, with the potential to adversely affect a substantial number of people and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact may occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited.

The proposed project site is currently developed with approximately 48,944 square feet of industrial space with associated surface parking and landscaping. The project site is located in a highly urbanized area and surrounded by light industrial, commercial, and aviation uses. According to the Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET online database, the project site and immediate surrounding area are not within or near a designated Significant Ecological Area. Moreover, ZIMAS identifies that the project site currently does not maintain habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

No species identified as endangered, rare, or threatened or habitat for such species are known to occur at the project site per local or regional plans by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the project site or in the immediate vicinity, nor is the project site located near undeveloped natural/undisturbed open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Furthermore, the project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan according to the most updated California Department of Fish and Wildlife, California Regional Conservation Plans (May 2021).

Therefore, the project is not expected to have a significant impact or substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

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

Less Than Significant Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. The project site does not abut the Los Angeles River or any other stream/water course. Therefore, the proposed project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies,

regulations or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Services (USFWS), and less than significant impacts would occur.

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

No Impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The project site does not contain any federally protected wetlands or wetland resources. The project site is located in a highly urbanized area and that is developed with residential, commercial, and institutional uses. Therefore, the proposed project would not have any effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and no impacts would occur.

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

Less than Significant Impact with Mitigation. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

The project site is currently developed with approximately 48,944 square feet of industrial space with associated surface parking and landscaping. The project proposes to demolish the existing four structures totaling 48,944 square feet and associated parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility. The project site is not located in a Significant Ecological Area According to the Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET online database or consists of habitat for protected species per ZIMAS. Thus, the project site is not part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the project site that are used by migratory fish, and there are no wildlife nursery sites in the area. According to the Arborist Report, prepared by Kay J. Greeley and dated September 18, 2023 (**See Appendix B – Arborist Report**), there are no street trees at the subject site. The Arborist Report states that there are no protected trees or shrubs at the subject site (Oak, Southern California Black Walnut, Western Sycamore, California Bay, Toyon, and Mexican Elderberry). However, the project proposes the removal of all 15 mature and significant, non-protected trees that are currently onsite. The project site also contains ornamental landscaping trees along the commercial frontage proposed to be removed. Three existing liquid ambar trees on the site and two existing Canary Island pines in the street frontage would be removed; however, these are not defined as street trees. Seven existing lagerstroemia crape myrtles (with a diameter of less than 8 inches) in the right-of-way areas would be retained.

The removal of such a significant amount of mature trees could potentially impact nesting sites for migratory birds.

All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA). The federal MBTA prohibits any person unless permitted by regulations, to “pursue, hunt, take, capture, kill, attempt to take, capture or kill,

possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention...for the protection of migratory birds...or any part, nest, or egg of any such bird". The project shall comply with the MBTA, to reduce potential impacts to migratory bird species that could potentially nest in trees. Therefore, the projects impact to the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites will be less than significant with the implementation of mitigation measures herein.

Mitigation Measure BIO-1: Habitat Modification (Nesting Native birds, Non-Hillside or Urban Areas). The project will result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 - b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
 - c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
 - d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

Mitigation Measure BIO-2: Tree Removal (Non-Protected Trees). Environmental impacts from project implementation may result due to the loss of significant trees on the site. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

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

Less Than Significant Impact with Mitigation. A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. According to the Arborist Report, prepared by Kay J. Greeley on September 18, 2023 (**Appendix B**), the proposed project would not conflict with the Protected Tree Ordinance (No. 186,873), as there are no identified native, protected tree/shrub species onsite which include Oak, Southern California Black Walnut, Western Sycamore, California Bay, Toyon, and Mexican Elderberry. However as stated previously and also identified in the submitted Arborist Report the project proposes to remove all of the existing mature, significant non-protected trees onsite for a total of 15 trees. The project site also contains ornamental landscaping trees along the commercial frontage that is proposed to be removed. Three existing liquid ambar trees on the site and two existing Canary Island pines in the street frontage would be removed however, are not defined as street trees. Seven existing lagerstroemia crape myrtles (with a diameter of less than 8 inches) in the right-of-way areas would be retained.

The project proposes to provide 37,683 square feet of landscape area. According to the landscape plans, submitted as part of the public record, the landscape plan includes providing 97 replacement trees of various species and sizes. Furthermore, 15 of these trees will be planted as evergreen shade trees (14 Holly Oak and one Fruitless Olive) in the parking lot in accordance with the City's Landscape Ordinance (Ordinance No. 170,978 – Guideline K). The project proposes a 17 foot landscape buffer along the rear property line as well as variable landscape buffers along the north, east and west property lines.

Therefore, conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance will be less than significant with the implementation of the mitigation measure herein.

Mitigation Measure BIO-2: Tree Removal (Non-Protected Trees).

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

No Impact. A significant impact may occur if a project is inconsistent with resource policies of any conservation plans of the types cited above. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur and no mitigation measures would be required.

V. CULTURAL RESOURCES

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

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

Less Than Significant Impact. A significant impact may occur if a project would disturb historic resources which presently exist within a project site. Section 15064.5 of the State CEQA Guidelines defines a historical resource as:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey that meets state guidelines; or
- 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The project site is not located within a Historic Preservation Overlay Zone (HPOZ) as shown on ZIMAS. Additionally, the project site is not listed on HistoricPlacesLA or SurveyLA, which are citywide surveys that identify historic resources and eligible historic resources. It should be noted that the project site is in close proximity to the Van Nuys Airport, which is located approximately 500 feet to the west and south of the subject site. The Van Nuys Airport is identified as an Institutional/Historic District under HistoricPlacesLA and SurveyLA - Historic Districts, Planning Districts and Multi-Property Resources. The Ninety-fourth Aero Squadron Headquarters Restaurant, located at 16320-16330 West Raymer Street approximately 0.2 mile southwest of the subject site, is identified under HistoricPlacesLA and SurveyLA as an Individual Resource that is eligible for listing or designation through SurveyLA. As proposed, the project will not cause a

substantial adverse change in the significance of these historical resources and therefore, less than significant impacts will occur and no mitigation is required.

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

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. The project site located within a highly urbanized area and has been previously disturbed. The proposed project proposes 1,500 cubic yards of grading with an excavation depth of approximately 14 feet, and the Project could have the potential to disturb previously undiscovered archaeological resources.

According to the records search conducted by the South Central Coastal Information Center (SCCIC) on October 9, 2023 (**see Appendix C**), no archaeological resources have been found at the proposed project site. The report states that archaeological sensitivity is unknown, because there are no previous studies for the subject site. It is always possible that unknown and unanticipated intact archaeological deposits and/or features could be present at subsurface levels. Per regulatory compliance measures, personnel of a proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of a project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Impacts to Tribal cultural resources are analyzed herein pursuant to State AB 52 under **Section XVIII. Tribal Cultural Resources**. Therefore, the impact would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features, including human remains. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Impacts to Tribal human remains regulated under State AB 52 are discussed herein in **Section XVIII. Tribal Cultural Resources**. Therefore, the impact to human remains would be less than significant.

VI. ENERGY

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

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

Less than Significant Impact. A significant impact may occur if construction or operation of a project consumed electricity, natural gas, or transportation fuel in a wasteful, inefficient, or unnecessary manner.

Construction

Petroleum-based fuels, such as gasoline and diesel, would be the primary sources of energy for the proposed project's construction activities. This is because construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which have a minimal electrical demand and would be turned off when not in use to avoid unnecessary consumption. Overall, the use of electricity during construction would be temporary and is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Petroleum-based fuels would be required to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. Based on the CalEEMod modeling prepared for the project (**see Appendix A – Air Quality and GHG Appendix**) and utilizing CO₂ emission factors for transportation fuels published by the U.S. Energy Information Administration (**see Appendix D – Energy Data prepared by EcoTierra**), it is estimated that the proposed project's construction activities would consume a total of approximately 48,480 gallons of diesel fuel and approximately 8,020 gallons of gasoline (**see detailed calculations provided in the Construction Transportation Energy Worksheet included in Appendix D**).

Consumption of transportation fuel during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and the contractor would be required to comply with the California Air Resource Board (CARB)'s In-Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of

heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, the project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the project.

Operation

Electricity and Natural Gas

The project would be required to comply with LAMC Section 99.04.106.8 (added by City Ordinance No. 187,714), which requires all newly constructed building to be all-electric buildings. As such, operation of the project would not include connection to supplies of natural gas or result in demand for natural gas. All project systems, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances would be powered by electricity provided by LADWP. According to the project's CalEEMod modeling (**see Appendix A - Air Quality and GHG Appendix**), the proposed project would have a combined electrical demand of 2,036,774 kilowatt-hours, or 2.04 gigawatt-hours (GWh) per year. LADWP projects that its total sales in 2025 (the project's operational year) will be 20,874 GWh (Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1. 2021 Load Forecast, Page A-7). As such, the proposed project's operational electrical demand would represent a negligible portion of the electrical consumption anticipated by LADWP.

The project would be required to comply with all standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. Furthermore, the proposed project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during project operations related to water usage, solid waste disposal, and vehicle trips to and from the project site by employees and visitors. According to the project's Transportation Assessment Report, prepared by Armen Hovanessian Transportation Consulting, Inc. on October 4, 2023 (**see Appendix E – Transportation Assessment Report**) and reviewed by the Los Angeles Department of Transportation (LADOT) in a letter dated October 5, 2023 (**see Appendix F – LADOT Assessment Letter**), the proposed project would result in a net increase of 1,897 daily Vehicle Miles Traveled (VMT) and a net increase of 177 daily vehicle trips when compared to the existing land use and a total daily VMT of 3,175 and 296 daily vehicle trips. According to CARB's On-Road Emissions Factor (EMFAC) model (**see Appendix D – Energy Data**), diesel-powered vehicles will account for 4.69 percent of all on-road VMT and will have an average fuel efficiency weighted for percentage of miles traveled of 12 miles per gallon (mpg) in 2025 (the proposed project's tentative operational year), while gasoline-powered vehicles will account for 89.16 percent of on-road VMT with a fuel efficiency of 26 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles will account for the remaining on-road VMT. Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the proposed project would consume approximately 2,706 gallons of diesel fuel and 23,744 gallons of gasoline per year (calculated provided by EcoTierra as follows: (1) for diesel: 4.69 percent of total 692,405 VMT = 32,474 diesel VMT / 12 diesel mpg = 2,706 gallons

of diesel; (2) for gasoline: 89.16 percent of total 692,405 VMT = 617,348 gasoline VMT / 26 gasoline mpg = 23,744 gallons of gasoline). According to CARB's EMFAC model as shown in **Appendix D**, on-road vehicles in Los Angeles County will consume approximately 533 million gallons of diesel and approximately 3.5 billion gallons of gasoline in 2025. Accordingly, fuel consumption by employees and visitors during operation of the proposed project would represent a negligible portion of fuel consumed in the County.

Based on the above data, although the project would increase energy use at the proposed project site, the electrical and petroleum-based fuel demands would be a small fraction of projected demands within the LADWP service area and Los Angeles County, respectively. As such, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation and impacts would be less than significant.

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

Less than Significant Impact. State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in California Code of Regulations (CCR) Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every three years to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The new 2022 standards became effect on January 1, 2023. The proposed project would be required to meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency.

The proposed project would also be subject to the policies set forth in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) at the regional level. SCAG's 2020 Connect SoCal is the most recent update to their RTP/SCS and is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill (SB) 375. With regard to individual developments, such as the proposed project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. Connect SoCal's goal is to actively encourage and create incentives for energy efficiency, where possible. As previously discussed, the proposed project would follow applicable energy standards and regulations with regard to efficiency during construction and would be built and operated in accordance with all applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time of construction. The project proposes to include 26 bicycle parking spaces (12 short-term and 14 long-term), electric vehicle charging stations, and roof area for future solar panels, in support of alternative modes of transportation and renewable energy sources. In addition, the project's development on an infill site of a commercial building that would employ workers in proximity to existing transit would serve to reduce per-employee VMT and associated fuel consumption within the region, consistent with the goals of Connect SoCal.

Based on the above, the proposed project would implement features and systems designed to reduce the consumption of energy and has been located consistent with policies designed to reduce VMT. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

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

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

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the project site and if the project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to ZIMAS records, the nearest active fault is the Northridge fault, which is located approximately 6.5 km from the project site. Additionally, ZIMAS records show that the project site is not located within an Alquist-Priolo Special Studies Zone or Fault Rupture Study Area. Furthermore, the project was reviewed and approved by LADBS under the Soils Report Approval Letter Log #128534-01 and dated February 1, 2024 and Soils Report Review Letter Log #128534 dated December 5, 2023 (**see Appendix G**). The project was also reviewed under the Geotechnical Exploration Report prepared by Leighton Consulting on July 27, 2023 (**see Appendices H and H.1**). The conditions in these letters and reports are incorporated herein. The proposed project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. For reasons stated herein, the project will have less than significant impacts.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, development of the proposed project could expose people and structures to strong seismic ground shaking. However, the proposed project would be designed and constructed in accordance with State and local Building Codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. As previously stated, the project was reviewed and approved by LADBS in the Soils Report Approval Letter Log #128534-01 and dated February 1, 2024 (**see Appendix G**) and by reference the conditions in these letters are incorporated herein. The proposed project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. Therefore, impacts related to strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a

buildup of pore-water pressure during severe ground shaking. According to ZIMAS records, the subject site is not located within a Liquefaction Zone, and as previously stated, the project was reviewed and approved by LADBS in the Soils Report Approval Letter Log #128534-01 dated February 1, 2024 (see **Appendix G**) and by reference the conditions in this letter are incorporated herein. Additionally, the project site is not located in a Seismic Hazard Zone or Flood Hazard Zone and liquefaction is not considered a hazard at the site as reported in **Appendices H and H.1** which are by reference incorporated herein. Furthermore, specific Regulatory Compliance Measures (RCMs) in the City of Los Angeles regulate the grading and construction of projects in these particular types of locations and will reduce any potential impacts to less than significant. Regulatory Compliance Measures include the Uniform Building Code Chapter 18, Division 1, Section 1804.5: Liquefaction Potential and Soil Strength Loss. These RCMs have been historically proven to work to the satisfaction of the City Engineer to reduce any impacts from the specific environment the project is located. Therefore, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. A significant impact would occur if the proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. ZIMAS records show that the project site is not located within a landslide hazard zone. The project site and surrounding area are relatively flat. Therefore, the proposed project would not expose people or structures to potential effects resulting from landslides, and no impacts would occur.

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

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Development of the proposed project would require demolition of the existing buildings, surface parking and landscaping. The development of the proposed project also requires grading, excavation, and other construction activities that have the potential to disturb subsurface earth materials and expose soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. In addition, the proposed project would be required to develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. Furthermore, LADBS issued a Soils Report Approval Letter Log #128534-01 and dated February 1, 2024 (see **Appendix G**) which contains conditions which are by reference incorporated herein. Therefore, less than significant impacts resulting in soil erosion or loss of topsoil are expected.

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

Less Than Significant Impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. Development of the proposed project would not have the

potential to expose people and structures to seismic-related ground failure, including liquefaction and landslide as previously discussed. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. According to ZIMAS records, the project site is not identified as being located in an oil field or within an oil drilling area. The proposed project would be required to implement standard construction practices that would ensure that the integrity of the project site and the proposed structures are maintained. Construction will be required by the Department of Building and Safety to comply with the City of Los Angeles Uniform Building Code (UBC) which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of the Building Code requirements, the Department of Building and Safety's issued Soils Report Approval Letter Log #128534-01, dated February 1, 2024 (**see Appendix G**), which is by reference incorporated herein, the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying.

The proposed project would be required to comply with the City of Los Angeles Uniform Building Code, the LAMC, and other applicable building codes which include building foundation requirements appropriate to site-specific conditions, such as expansion potential. Furthermore, LADBS issued a Soils Report Approval Letter Log #128534-01 dated February 1, 2024 (**see Appendix G**) which contains conditions which are by reference incorporated herein. Therefore, impacts from expansive soil would be less than significant.

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

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative wastewater disposal systems. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct.

A paleontological records search conducted by the Natural History Museum, dated September 3, 2023 (**See Appendix I – Paleontology Collection Records**), for the subject site, indicates there are no previously encountered fossil vertebrate finds located within the project site. However, as detailed in the records search, there are localities from the same sedimentary deposits that occur in the project area, either at the surface or at depth. Further, the Natural History Museum September 3, 2023 letter states that their records search is not intended as a paleontological assessment for the purposes of CEQA. Therefore, as the proposed project would require excavation and grading for utility and foundation work, there would be a potential to encounter buried paleontological resources. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Impacts to human remains regulated under State AB 52 are discussed herein in **Section XVIII. Tribal Cultural Resources**. Therefore, the impact to paleontological resources would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

Climate Change Scoping Plans

The Scoping Plan is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the 2022 Scoping Plan Update in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business-as-usual activities. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted focus to the newer SB 32 goal of a 40 percent below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve the aforementioned targets, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires. Estimated statewide GHG emissions reductions from the 2022 Scoping Plan are shown in **Table 6, Estimated Statewide GHG Emissions Reductions in the 2022 Scoping Plan**.

Table 6
Estimated Statewide GHG Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions (MMTCO₂e)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below BAU necessary to achieve 1990 levels by 2030	52 (16.7%) ^A
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)
Notes: <i>MMTCO₂e = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.</i> ^A $312 - 260 = 52$. $52 / 312 = 16.7\%$ <i>Source: CARB, Final 2022 Climate Change Scoping Plan, November 2022.</i>	

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor’s Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State’s GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment – the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as:

- Green New Deal
- Green Building Code

- City of Los Angeles All-Electric Buildings
- General Plan Housing Element (Housing Needs Assessment)
- Mobility Plan 2035

These programs and regulations are discussed below under the section for local GHG regulatory framework.

Local

City of Los Angeles Green New Deal

In 2007 the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (“LA Green Plan/Climate LA”). This document outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City’s first “Sustainable City pLAN” that was released in 2015. It augments, expands, and elaborates the City’s vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists “Climate Mitigation” (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfills by 2028.

- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the project shall comply with all applicable mandatory provisions of the 2013 Los Angeles Green Code and as it may be subsequently amended or modified.

City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with few exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances, and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratories, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions – more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32 and the region's Sustainable Community Strategy.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, aligns regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the South Coast Air Quality Management District (SCAQMD), of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGAs such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just 4 percent of total land in the SCAG region, but they are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase mobility options, leverage transit investments, and improve access to workplaces and other destinations, reducing vehicle miles traveled (VMT) and, crucially, associated GHG emissions.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the state's emissions goals.

SCAQMD CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The SCAQMD is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds in a board meeting held on December 5, 2008 and found as Agenda No. 31. A GHG Significance Threshold Working Group (the "Working Group") was formed to further evaluate potential GHG significance thresholds under the Greenhouse Gases CEQA Significance Thresholds. The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less than significant impact on climate change.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

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

Less Than Significant Impact. The Reseda-West Van Nuys Community Plan, a part of the Land Use Element of the City's General Plan, states: "Industrial land use is a valuable commodity. It must be maintained to provide economic benefits and employment opportunities generated by occupants of those site. Future Industrial development which would be more compatible with the existing airport-oriented land uses and less noise sensitive to airport activity, should be considered adjacent to the Van Nuys Airport." (Community Plan, page 8) The economic crisis and the climate crisis must be confronted simultaneously, and it is possible to address the economic crisis in a manner that supports the State's climate and regional air quality goals. The proposed project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The project site is located in a High Quality Transit Area (HQTa) and would likely increase employment density at the site, as the proposed project would demolish approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, more than doubling the site's operational square footage. By increasing employment density at the site, the project would further leverage the presence of nearby high quality transit options, which would facilitate reductions in work-related vehicle trips, VMT, and corresponding GHG emissions. Additionally, the project would not generate sufficient net new daily vehicle trips to substantially affect the 2020-2045 RTP/SCS's VMT reduction goals (see **Appendix E**). Furthermore, the project would not be considered to have any effect on attainment of the 2020-2045 RTP/SCS's VMT reduction goals due to its nominal traffic generation. Given these considerations, the proposed project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals and greenhouse gas emission will have less than significant impacts.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.4 recommends that lead agencies quantify greenhouse gas (GHG) emissions of projects and consider several other factors that may be used in the determination of significant of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significant threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.

For the proposed project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the

California Air Resource Board's (CARB) 2022 Scoping Plan Update, as well as the City's Green New Deal.

GHG Emissions Background

GHG emissions include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104. Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

CARB reports that in 2019, emissions from GHG emissions statewide were 404 MMTCO₂e, 27 MMTCO₂e below the state's 2020 GHG limit of 431 MMTCO₂e. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

Regulatory Setting

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. Below is a discussion of (1) the plans, policies, and regulations (collectively, the “Applicable GHG Regulations”) that are fundamental to determining whether the proposed project would have a significant impact on GHG emissions, and (2) the existing conditions under the Applicable GHG Regulations.

State

The State legislature, executive office, and administrative agencies have promulgated various regulations, rules, policies, and strategies that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the “AB 32 Scoping Plan” or 2008 Scoping Plan)
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the “Supplemental FED”)

- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the “First Update” or 2013 Scoping Plan Update)
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target (the “2017 Scoping Plan Update”)
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)
- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the “2022 Scoping Plan Update”)

Other regulations would also have an indirect effect on the project’s GHG emissions. The project’s relation to the following regulations would not be determinative of its CEQA significance, but explanations of these regulations are nonetheless provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

EO S-3-05

EO-S-3-05, issued in 2005, has the goal of reducing the State’s GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

The California Global Warming Solutions Act of 2006, AB 32, committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.
- By 2020, reduce statewide GHG emissions to 1990 levels.

The 2010 target to reduce GHG emissions to 2000 levels was not met. AB 32 required CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (the “Guidelines Amendments”) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project’s effect on the environment, as pursuant to CEQA.

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or

performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

- (1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

SB 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, aligns regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger vehicle miles traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SB 32

SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

EO B-55-18, issued in 2018, established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

AB 1279

AB 1279 (September 2022) requires the state to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal.

B 350

The objectives of the Clean Energy and Pollution Reduction Act of 2015 (SB 350) are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

Methodology

The methodology herein for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

Consistency with Plans

The project's GHG impacts are evaluated by assessing the project's consistency with applicable statewide, regional, and local GHG reduction strategies. As discussed previously, the project will be evaluated for consistency with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

On a statewide level, the 2022 Scoping Plan Update provides measures to achieve the State's GHG reduction targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reductions (and corresponding GHG reductions) required under SB 375. The City's Green New Deal and Green Building Code require applicable projects to implement energy efficiency measures pertaining to climate change. This analysis addresses consistency with the Green New Deal's strategies and goals. Thus, if the project is designed in accordance with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal, the project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (i.e., SB 375 for the 2020-2045 RTP/SCS and AB 1279 for the 2022 Scoping Plan Update). A consistency analysis is provided and describes the project's compliance or conflict with performance-based standards included in the applicable portions of the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to building momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA."

Quantification of Project GHG Emissions

The California Emissions Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, which provided data (e.g., emissions factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and

comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

Construction GHG Emissions Modeling

The project's construction emissions were estimated using CalEEMod version 2022 (**See Appendix A – Air Quality and GHG Appendix**). CalEEMod calculates emissions from sources such as off-road equipment usage and on-road vehicle travel associated with hauling, delivery, and construction worker trips. GHG emissions generated by the project's construction activities reflect the types and quantities of construction equipment that would be used to implement the project, which would involve demolishing the site's existing improvements to construct a 123,464 square foot warehouse facility.

In accordance with SCAQMD guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the project, assumed to be 30 years. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. Additionally, GHG emission reductions measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that any GHG reduction measures will address construction GHG emissions as part of operational GHG reduction strategies. Thus, total construction GHG emissions were divided by 30 and then added to the project's annual operational GHG emissions inventory.

Operational GHG Emissions Modeling

Like construction, CalEEMod version 2022 under **Appendix A** was used to estimate direct and indirect GHG emissions generated by the project's operations. Details regarding modeling assumptions are also provided in the appendix. The analysis addresses GHG emissions from the following sources:

- **Area Sources**: Emissions associated with the on-site use of powered equipment.
- **Energy Sources**: Emissions associated with a project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- **Mobile Sources**: Emissions associated with a project's related vehicle travel.
- **Water/Wastewater Sources**: Emissions associated with energy used to pump, convey, delivery, and treat water.
- **Solid Waste Sources**: Emissions associated with the disposal of solid waste into landfills.
- **Refrigerant Sources**: Emissions associated with fugitive GHG emissions associated with building air conditioning and refrigeration equipment.

Threshold (a) and (b) Analysis

As described above, compliance with applicable GHG emissions reduction plans would result in a less than significant project-level and cumulative impact. The following section describes the extent the project complies with or exceeds the performance-based standards included in the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal. As demonstrated below, the project would be consistent with these applicable GHG reduction plans and policies.

2020-2045 RTP/SCS

As noted earlier, SCAG's latest 2020-2045 RTP/SCS (Connect SoCal) is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by

2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

The project site is located in a High Quality Transit Area (HQTa) and would likely increase employment density at the site, as the proposed project would demolish approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, more than doubling the site's operational square footage. By increasing employment density at the site, the project would further leverage the presence of nearby high quality transit options, which would facilitate reductions in work-related vehicle trips, VMT, and corresponding GHG emissions. Additionally, the project would not generate sufficient net new daily vehicle trips to substantially affect the 2020-2045 RTP/SCS's VMT reduction goals (see **Appendix E**). Furthermore, the project would not be considered to have any effect on attainment of the 2020-2045 RTP/SCS's VMT reduction goals due to its nominal traffic generation. Given these considerations, the proposed project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals. Further, the project would support transition to ZEVs through its inclusion of five EV parking spaces, consistent with the City's Green Building Code requirements.

Green New Deal

The Green New Deal provides information as to what the City will do with buildings and infrastructure in its control, and it provides targets related to housing and development, as well as mobility and transit, that are related to GHG reduction. The project would generally comply with these targets as it proposes development in an urban infill location that is also within a HQTa, which would promote increases in transit and active mode shares. Additionally, as noted previously, the proposed project would result in minimal vehicle trip generation that would not impact regional VMT reduction goals.

Project GHG Emissions

As explained earlier, the estimates of the project's construction and operational GHG emissions shown below are provided for informational use only.

Construction Emissions

Construction of the project is anticipated to last approximately 11 months and would involve demolition of the site's existing improvements prior to grading and construction of the proposed 123,464 square foot warehouse facility. Construction of the project is estimated to generate approximately 565 MTCO₂e. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over a 30-year project lifetime. This results in annual project construction emissions of approximately 18.8 MTCO₂e.

Operational Emissions

Table 7, Operations-Related GHG Emissions at Project Buildout shows the project's estimated GHG emissions from operations, including the Project's annualized construction-related GHG emissions from above. Operation of the proposed project is estimated to result in approximately 1,294.4 MTCO₂e per year.

Table 7
Operations-Related GHG Emissions at Project Buildout

Source	Emissions (MTCO₂e)
Mobile	345
Area	2.51
Energy	774
Water/Wastewater	101
Solid Waste	47.8
Refrigerants	5.32
Construction	18.8
Total Emissions	1,294.4
<i>Source: NTEC, 2023.</i>	

Threshold (a) and (b) Conclusion

In summary, the proposed project's location, land use characteristics, and design would be consistent with 2020-2045 RTP/SCS, 2022 Scoping Plan Update, and Green New Deal efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets.

Therefore, it is concluded that the proposed project's impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☒	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact with Mitigation. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Demolition and Construction. Construction of the proposed project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with construction of any urban development project. All of these materials would be used temporarily during construction. The subject site is developed with an equipment yard and maintenance facility for AT&T. The eastern portion of the site, 16201 Raymer Street, is developed with a two-story office building/automotive maintenance garage, and two single-story equipment storage buildings. The western portion of the site, 16251 Raymer Street, is developed with a concrete tilt-up warehouse building that is used for vehicle storage and offices. The remainder of the site consists of paved vehicle parking and exterior equipment storage lots. According to the Phase I Environmental Assessment Report (ESA), prepared by NV5 on October 27, 2023 (**see Appendix J**), there are aboveground storage tanks (ASTs) at the project site, but there is no evidence of spills, leaks or releases of diesel fuel from the ASTs. One in-ground three-stage clarifier was observed in the vehicle maintenance garage, but there is no evidence of spills, leaks or release of hazardous substances or petroleum products into either clarifier. Two in-ground hydraulic vehicle lifts were observed in the vehicle maintenance garage, but no evidence of leaks or releases from the lifts was observed. Any demolition activity associated with the removal of the ASTs, clarifier, and vehicle lifts will be mitigated to a less than significant level with the implementation of the mitigation measure herein.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Construction activities would be contained on the project site and, thus, any emissions from the use of such materials would be minimal and localized to the project site. Therefore, construction of the project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Operation. Operation of the proposed project would not involve the routine use, transport, or disposal of hazardous materials. The proposed project includes the development of a new industrial warehouse. This urban use would not involve the routine use of hazardous materials. Instead, the operation of the project has limited hazardous materials that are similar to any other urban development such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the project's uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. As a result, the proposed project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Therefore, operation of the project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Moreover, the proposed project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. The project would be required to comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Compliance with the mitigation measure incorporated herein would reduce any impact to a less than significant level.

Mitigation Measure HAZARDS-1: Creation of a Health Hazard. Environmental impacts to human health may result from project implementation due to a release of chemical or microbiological materials into the community. However, these impacts will be mitigated to a less than significant level by the following measure:

- Prior to the issuance of a use of land or building permit, or issuance of a change of occupancy, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of any hazardous material(s).
- Approved plans for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) shall be submitted to the decision-maker for retention in the case file.

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

Less Than Significant with Mitigation. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials.

As previously stated, the subject site is developed with an equipment yard and maintenance facility for AT&T. According to the Phase I Environmental Site Assessment Report (ESA), prepared by NV5 on October 27, 2023 (**see Appendix J**), no evidence of underground storage tanks (USTs) were observed or reported during the site reconnaissance at the subject site. However, regulatory records pertaining to several USTs that were previously removed from the site were identified during the Phase I ESA preparation.

Several groundwater monitoring wells were observed in the parking areas of the southern adjoining properties. These wells are believed to be associated with on-going site assessment at the property known as the Rexford Industrial – Van Nuys Airport Industrial Center, LLC. No monitoring wells were observed or reported to be present on the subject site.

Additionally, the ESA reported no evidence of a Recognized Environmental Condition (REC), Historical Recognized Environmental Condition (HREC), or Controlled Recognized Environmental Condition (CREC) at the proposed project site during the Phase I Assessment **(See Appendix J)**. However, the Phase I ESA identified several nearby and adjacent properties where releases of Volatile Organic Compounds (VOCs) into groundwater have been reported. Additionally, soil vapor sampling previously conducted at the eastern adjoining property identified concentrations of VOCs that were indicative of a regional impact and off-site vapor migration. While no evidence of an on-site release of VOCs has been identified, the known regional impact and documented off-site releases are considered to represent a Vapor Encroachment Condition (VEC). As no evidence of an on-site release was identified and responsible parties have been identified for the known off-site releases, it is unlikely that that an environmental regulatory agency would require additional assessment or action. Therefore, the ESA Phase I concludes that the VEC is considered a de minimus condition. Compliance with the above mitigation measure incorporated herein would reduce any impact to a less than significant level.

Mitigation Measure HAZARDS-1: Creation of a Health Hazard.

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

Less Than Significant Impact with Mitigation. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

The closest existing schools are: (1) James Monroe High School located at 9229 Haskell Avenue approximately 2 miles northeast of the subject site; and (2) Stagg Elementary School which is located approximately 2.3 miles southwest of the subject site at 7839 Amestoy Avenue. Regardless, as previously mentioned, the proposed project would store, sell, and use, at most, minimal amounts of hazardous materials such as typical cleaning solvents used for janitorial purposes. As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the proposed project would be typical of those used during construction of mixed-use developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the project would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Furthermore, all materials used during both the construction and operation of the proposed project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state Occupational Safety and Health Act requirements, and local regulations for the storage, use, transport, and disposal of hazardous materials. As a result, use of these materials would not create a significant hazard to nearby schools. Furthermore, the school would be generally shielded from the proposed project site by its distance from the subject site, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the project site due to the existing urbanized area. Therefore, compliance with the above mitigation measure incorporated herein would reduce any impact to a less than significant level.

Mitigation Measure HAZARDS-1: Creation of a Health Hazard.

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

Less Than Significant Impact With Mitigation. California Government Code Section 65962.5 requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. The California Department of Toxic Substances Control (DTSC) maintains a database (see EnviroStor at <http://www.envirostor.dtsc.ca.gov/public/>) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC’s oversight. The subject site is not identified on the EnviroStor database.

Provided in **Appendix J**, the Phase I ESA included a review of governmental databases related to hazardous materials sites. The subject site is listed on the CHMIRS and Haulers, but neither listing is considered to represent a REC. Additionally, the subject site is listed on the RCRA VSQ, FINDS/ECHO, HAZNET, HWTS, UST, CERS HAZWASTE, SWEEPS UST, HIST UST, CA FID UST, HAZMAT, and CERS databases. However, according to the RCRA-Very Small quantity Generator (VSQ) database, the Pacific Bell facility located at the site is a conditionally exempt small quantity generator of hazardous wastes. The facility was previously registered as a Large Quantity Generator of hazardous wastes from 1990 to 2022.

According to the HAZNET and HWTS databases, this facility reported the disposal of hazardous wastes including unspecified aqueous solutions, waste oil and mixed oil, aged or surplus organics, and oil/water separation sludge.

As reported in the UST, SWEEPS UST, and CA FID UST databases, this facility is the registered location of a 12,000-gallon gasoline UST. Los Angeles Fire Department (LAFD) records indicated that one 12,000-gallon UST was removed in 2005. Post removal soil sampling did not identify evidence of a past release from the UST and the UST removal was granted no further action status by the LAFD. LAFD records also appear to indicate that an additional 12,000-gallon fuel UST was previously removed from the facility in 1997 and a 285-gallon waste oil UST was previously removed from the facility in 1989. Based on post removal soil sampling, both previous removals were also granted no further action status by the LAFD.

According to the Los Angeles HMS and CERs databases, this facility is an active chemical storage facility and registered location of an aboveground storage tank (AST). No violations were identified during the most recent Fire Department inspection in 2021.

No leaks, spills, releases, or violations have been reported at this address. The Phase I ESA (**See Appendix J**) determined that based on the lack of evidence suggesting a release of hazardous materials and/or petroleum products has occurred at this facility, this listing is not considered to represent a recognized environmental concern (REC).

Given the previous use of the site for underground storage tanks, as discussed above (**see Appendix J**), any impact to schools would be reduced to a less than significant impact with incorporation mitigation measures.

Mitigation Measure HAZARDS-1: Creation of a Health Hazard.

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

Less Than Significant Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The subject site is located less than 500 feet south and east of Van Nuys Airport and is within the airport's influence area (County of Los Angeles, L.A. County's Airport Land Use Commission Site (ANET).<https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>). According to ZIMAS records, the subject site is designated as an Airport Hazard Zone within the 940-foot Height Limit Contours Above Mean Sea Level and a Horizontal Surface Area. An Airport Hazard Zone is an area whose boundaries impose height limitations on the use of the land. Airport Hazard means any structure or tree or use of land which obstructs the airspace required for the flight of aircraft in landing or taking off at an airport or is otherwise hazardous to landing or taking off aircraft.

The proposed building would vary in height up to a maximum of 52 feet. Therefore, the proposed project's height would be within the height requirements for the Airport Hazard Zone and would not create a safety hazard for people working in the subject area.

According to the Los Angeles County Airport Land Use Commission (A-NET), the subject site is located near – but outside of – the airport's 65 dB CNEL contour, meaning that average daily noise conditions at the subject site are likely approximately 65 dB CNEL, or slightly lower. Additionally, the Van Nuys Airport Plan addresses noise-sensitive building uses, including residential uses, located within the airport's 65 dB CNEL contour. However, the Project is not a residential or other noise-sensitive land use. It is also not located within the airport's 65 dB CNEL contour. The Van Nuys Airport Land Use Plan does not consider the proposed project to be incompatible with the airport's noise levels. Additionally, the City has adopted its own standards and provisions included in the California Department of Transportation Noise Standards, Title 21, Subchapter 6 of the California Code of Regulations that all noise sensitive land uses within the 65 CNEL contour should be soundproofed. Therefore, impacts would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The City's Emergency Management Department maintains the City of Los Angeles Emergency Operations Plan (EOP), last updated and adopted in November 2021. The EOP describes the overall Citywide response functions and capabilities for small to large scale emergency situations. The Safety Element references the City's Emergency Management Department 2018 Local Hazard Mitigation Plan (LHMP). The LHMP identifies Critical Facilities and Infrastructure including

critical response facilities and critical infrastructure (transportation and utilities). In addition, the Evacuation Functional Support Annex (EFSA), last updated in October 2020, was developed in support of the EOP to facilitate City and other responsible agency response during evacuations. While the EOP and EFSA do not identify specific emergency response or evacuation routes, they establish that primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and County of Los Angeles, and state that the City will work with the Operational Area, Los Angeles County Sheriff, Law Enforcement agencies from surrounding jurisdictions, California Department of Transportation (Caltrans), California Highway Patrol (CHP), City and/or County Public Works, and other applicable agencies or departments to identify evacuation pick up points and transportation routes. Consistent with this approach, the City's 2021 Safety Element Update acknowledges that "jurisdictional infrastructures, such as roads and emergency services, have become increasingly interrelated," and refers to the Los Angeles County Safety Element for critical systems and evacuation routes for the entire County.

According to Los Angeles County Department of Regional Planning, General Plan 2035, Safety Element, updated on July 12, 2022, the I-405, located east of the subject site and US Route 101, located south of the subject site, are designated disaster routes and may be used for an evacuation during an emergency. Sherman Way, located north of the subject site, is also a designated disaster route.

The proposed project constitutes a private development located on private land and does not propose alteration to the public rights-of-way abutting the subject site other than what is required by the City. While it is expected that the majority of construction activities for the proposed project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day as required by the City, which could potentially require temporary lane closures. No full road closures are anticipated along Raymer Street during construction. However, if partial lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access in accordance with the LAMC and the Los Angeles Fire Department (LAFD) requirements.

Additionally, operation of the proposed project would not permanently alter vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. The proposed project would comply with LAFD access requirements and would not impede emergency access in the vicinity of the subject site. Therefore, the proposed project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan and impacts would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire. The greatest wildfire risks are in areas designated as a Very High Fire Severity Zone, High Wind Velocity Area, and Hillside areas. The subject site is not located within a Very High Fire Severity Zone, High Wind Velocity Area, or Hillside area. The subject site is located on a flat in-fill site that is surrounded by improved properties. The project site is located in the San Fernando Valley which is surrounded by mountain ranges on all sides (Santa Susana Mountains to the northwest, Simi Hills to the west, Santa

Monica Mountains to the south, Verdugo Mountains to the east, San Gabriel Mountains to the northeast). It is possible that pollutant concentrations from wildfires in mountain ranges surrounding the San Fernando Valley could negatively impact the subject site. Impacts to project residents due to pollutant concentrations can be mitigated on an as needed basis by closing windows and using individual air filtration devices. Therefore, the impact of a possible spread of a wildfire would be less than significant.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality or violates waste discharge requirements or otherwise substantially degrades surface or ground water quality. The project will comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB). Stormwater runoff from the proposed project has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (ordinary household cleaners). Thus, the proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. The ordinances contain requirements for construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all projects consistent with the City's Landscape Ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook (**see Appendix K – Preliminary Drainage Report and Appendix L – Low Impact Development Plan**). The project will comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB), and conformance with regulations would be ensured during the City's building plan review and approval process.

The project would include excavations up to a depth of 14 feet below the existing grade for building foundations and would result in an export of existing soil material. Although not anticipated at the project site, any contaminated soils found would be captured within that volume of excavated material, properly removed from the project site, and remediated at an approved disposal facility in accordance with regulatory requirements. During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the project to release contaminants into the groundwater. Additionally, the project is mitigated elsewhere herein for the disposal of hazardous waste (**see Section IX. Hazards and Hazardous Materials**).

Therefore, the proposed project would result in less than significant impacts to water quality and will not violate waste discharge requirements or otherwise substantially degrade surface or ground water quality.

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. As previously stated, the project would include excavations up to a depth of 14 feet

below the existing grade for building foundations. According to information provided by EcoTierra, there are two groundwater monitoring wells located 4,500 feet west of the subject site near Bull Creek and Saticoy Avenue. However, construction activities would not be anticipated to affect existing wells, nor would the proposed project include the construction of water supply wells. Groundwater was not encountered during subsurface exploration down to 51.5 feet conducted as part of the Geotechnical Exploration Report (**see Appendix H**) and historically high groundwater depth in the vicinity is approximately 80 feet below the ground surface. Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 14 feet below ground surface, including foundation excavations. Considering the lack of groundwater in the subsurface borings at the subject site and the depth of the proposed construction, it is unlikely that static groundwater would be encountered during construction. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation, as required through federal, State, and local laws and BMPs, would be critical for future performance of the proposed project.

The proposed project would not require the use of groundwater at the project site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Operation of the project does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources outside the Los Angeles Basin. Furthermore, the project's BMPs, as described above, would capture stormwater from the developed portions of the project site to be used for landscaping irrigation. Thus, the majority of the stormwater runoff would be retained on-site. The stormwater that bypasses the capture and use system would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, since the project site is currently developed and provides little groundwater recharge potential, operation of the project would not substantially impact the amount of groundwater recharge occurring on-site.

The project does not include the installation or operation of water wells. The project does not include the development of any extraction or recharge system. The project is not located in the vicinity of the coast, or in an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Generally, operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Any spills of hazardous material or leakage of underground storage tanks during demolition and construction are addressed elsewhere herein (**see Section IX. Hazards and Hazardous Materials**).

Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of a project. There are no streams or rivers that abut the project site, which is approximately 1.3 miles east of the Los Angeles County Flood Control Channel (Bull Creek). Construction associated with the project would be subject to the requirements of LARWQCB which controls the quality of runoff entering municipal storm drains in Los Angeles County. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with construction-related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Significant alterations to existing drainage patterns within the project site and surrounding area would not occur. Therefore, impacts would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Impermeable surfaces resulting from the development of the project would not substantially change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. Accordingly, significant alterations to existing drainage patterns within the site and surrounding area would not occur. Therefore, the proposed project would result in less than significant impacts related to the alteration of drainage patterns and on- or off-site flooding.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site such that flooding would occur. A project-related significant adverse effect may also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The proposed project was analyzed under the Preliminary Drainage Report, prepared by Kimley Horn on September 15, 2023 (**see Appendix K**), which determined that the proposed development will not change the overall runoff flow and thus the stormwater detention is not required. The analysis additionally shows that the proposed drainage pattern will remain and there are no changes to the offsite drainage pattern. Site-generated surface water runoff would continue to flow to the City's storm drain system. Any project that creates, adds, or

replaces 500 square feet of impervious surface must comply with the Low Impact Development (LID) Ordinance or alternatively, the City's Standard Urban Stormwater Mitigation Plan (SUSMP), as an LAMC requirement to address water runoff and storm water pollution. As stated in **Appendix L**, the project will comply with all applicable LID requirements. Therefore, the proposed project would result in less than significant impacts related to existing storm drain capacities or water quality.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if a project results in a substantial alteration of flood flows. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map and NavigateLA, the subject site is in flood Zone C, which is a designation for areas determined to have a minimal flood hazard. No streams or rivers that may overflow or breach a levee are located on or near the subject site and the site is not located within any high-risk coastal areas. In addition, ZIMAS records shows that the subject site is not located within a tsunami hazard area. As such, the proposed project would not be expected to encounter flood flows that it would impede or redirect. Therefore, no impacts would occur and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, mudflow, or flooding. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the down slope movement of soil and/or rock under the influence of gravity. The project site and the surrounding areas are not located near a water body to be inundated by seiche. Similarly, the project site and the surrounding areas are located in the San Fernando Valley and not near an ocean or lake. The project site is located approximately 13 miles inland from the Pacific Ocean shore. According to ZIMAS and NavigateLA, the project site is not located within a flood zone.

In 2017, the California Legislature passed a SB92 requiring state jurisdictional dams to develop inundation maps and emergency action plans. The Division of Safety of Dams approves inundation maps, and the California Governor's Office of Emergency Services approves emergency action plans. The site is mapped within a flood impact zone from the Lower San Fernando Dam. However, due to the location and distance of the site from this dam, the potential for earthquake-induced flooding to occur due to a failure of this dam is considered low. Catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers and Department of Water Resources (**See Appendix H**).

Therefore, the project would have a less than significant impact related release of pollutants due to inundation by seiche, tsunami, mudflow, or floods.

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

Less Than Significant Impact. A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans. Water quality control plans applicable to the proposed project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), the National Pollutant Discharge Elimination System (NPDES), the City's Low Impact Development (LID), the City's Stormwater and Urban Runoff Pollution Control, and the City's Standard Urban Stormwater Mitigation Plan (SUSMP).

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California. The project is required to comply with all applicable regulations of the SGMA as implemented by the State Water Resources Control Board, California Department of Water Resources, and local groundwater sustainability agencies.

Therefore, the project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

XI. LAND USE AND PLANNING

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

a) Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The proposed project is located within the boundaries of the Reseda – West Van Nuys Community Plan area within a highly urbanized area. The subject site is currently developed with 48,944 square feet of existing industrial space with associated parking and landscaping.

Uses surrounding the site include light industrial to the north, east, west, and south, and the Van Nuys Airport to the west (approximately 500 feet). Metrolink's Ventura County Line rail tracks are located directly adjacent to the northern boundary of the site. The project proposes to demolish the existing 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet.

As such, the project would be an infill project providing uses in keeping with the commercial and light industrial character of the surrounding area. Given its existing warehouse use, the proposed project would not introduce land uses that are inconsistent with development in the local area or affect existing land use relationships. Therefore, the project would not physically divide an established neighborhood or community. Related impacts would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to a project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The City of Los Angeles General Plan sets forth goals, objectives, and programs that inform land use decisions, and ultimately shape and guide the physical development of the City. It provides the foundational guide for planning, outlining how land is used and developed. Beyond serving as the legal basis for all local land use decisions, the City's General Plan outlines the vision for how the City will evolve, reflecting both the values and priorities of its communities. The Land Use Element of the General Plan consists of 11 citywide elements including the seven state mandated elements: Land Use, Transportation/Mobility Plan 2035, Noise, Safety, Housing, Open Space, and Conservation. The General Plan Framework Element is considered to be the organizing element that connects all the elements of the General Plan.

The City's Land Use Element is composed of 35 Community Plans. The subject site is located in the Reseda – West Van Nuys Community Plan, and is designated for Light Manufacturing land use. The Light Manufacturing land use designation corresponds to the MR2, M2, and P Zones. The subject site is zoned M2-1 which is consistent with the Light Manufacturing land use designation. The applicant is proposing the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility. Warehouse uses are permitted in the M2 Zone pursuant to LAMC Section 12.19; LAMC Section 12.21 A.1 limits the allowable floor area ratio (FAR) to 1.5:1. The applicant's plans show an FAR of 0.52:1, which is within the allowable FAR associated with the zone and height district. The proposed building is a single story with partial mezzanine and a maximum height of 52 feet in a zone that allows unlimited height and stories. The proposed 52 foot height is within the height limit of 940 feet above median sea level as regulated under the Airport Hazard area designation.

The decision makers will determine whether discretionary requests will conflict with applicable plans/policies. Impacts related to land use have been mitigated elsewhere, or are addressed through compliance with existing regulations. Therefore, the impact would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The project site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. In addition, the project site is not identified by the City as being located in an oil field or within an oil drilling area. Therefore, the proposed project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur.

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

No Impact. A significant impact may occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The project site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use. In addition, the project site is not identified by the City as being located in an oil field or within an oil drilling area. Therefore, the proposed project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur.

XIII. NOISE

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

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

Less Than Significant With Mitigation. A significant impact may occur if a project would generate noise or noise increases that exceed the applicable standards set forth in the City's General Plan Noise Element or the City's Municipal Code. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. Construction activity would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction noise for the project will cause a temporary increase in the ambient noise levels, but will be subject to LAMC regulations for construction and operations.

LAMC Section 112.03 instructs that noise due to construction or repair work shall be regulated under LAMC Section 41.40. Section 41.40 would prohibit the project's construction activities from occurring between the hours of 9:00 p.m. and 7:00 a.m. Within 500 feet of a residential use, such activities are prohibited from occurring before 8:00 a.m. or after 6:00 p.m. on any Saturday, Sunday or national holiday.

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones between the hours of 7 a.m. – 10 p.m.. A maximum noise level may not exceed the following noise limits at a distance of 50 feet: 75 db(A) for

construction, industrial, and agricultural machinery; 75 db(A) for powered equipment of 20 HP or less (such as chain saws, log chippers, powered and tools) intended for infrequent use; and 65 dB(A) for powered equipment intended for repetitive use including lawn mowers and backpack blowers. While the proposed project is not located within 500 feet of a residential zone, the Noise Appendix prepared for the proposed project (**see Appendix M**) shows that unmitigated construction equipment noise levels have a combined dBA Leq of 53.9 and an unmitigated construction noise level of 43.9 dBA Leq, which is below the maximum allowable within 500 feet of residential zones.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

Section 112.02 of the LAMC would prohibit mechanical noises from air conditioning, refrigeration, heating, pumping, filtering, and similar equipment from exceeding the ambient noise levels of occupied properties by greater than 5 dBA.

LAMC Section 114.03 prohibits loud and disruptive noise from loading or unloading activities between the hours of 10:00 p.m. and 7:00 a.m. within 200 feet of residential buildings. However, the subject site is not located within this 200-foot radius. The nearest residential buildings are approximately 800 feet to the north along Roscoe Boulevard.

According to EcoTierra, the project's construction noise impact associated with its on-site construction activities was determined by identifying the noise levels of construction equipment with the greatest potential to disrupt nearby sensitive receptors and assessing the noise increases that could result from their operations. Reference equipment noise levels were derived from the Federal Highway Administration's Roadway Construction Noise Model, version 2.0 (FHWA RCNM 2.0) (**See Appendix M – Noise Data**). The project's off-site construction noise impact from construction trucks was evaluated by comparing the proposed project's maximum construction truck trip generation to traffic on surrounding roadways.

The project's potential to result in significant noise impacts from on-site operational noise sources was assessed by identifying likely on-site noise sources and considering the impacts they could produce given the nature of the source (i.e., loudness and/or whether noise would be generated during daytime or more-sensitive nighttime hours), distances to nearby noise-sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC. The project's potential to result in significant noise impacts from its trip generation (e.g., traffic) was assessed by comparing the proposed project's maximum daily and hourly trip generation to traffic levels on surrounding roadways.

The subject site is located less than 500 feet east and south of Van Nuys Airport. As a result, daily noise levels are highly correlated with daily airport operations. According to the Los Angeles County Airport Land Use Commission (ALUC) (<https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>), the subject site is located near the boundary of Van Nuys Airport's 65 dB CNEL noise contour. Noise from surrounding light industrial and commercial uses have comparatively less influence on the subject site's daily noise levels, especially given the project's location on a cul-de-sac with reduced thru-traffic volumes.

As noted earlier, the nearest noise-sensitive receptors are residential land uses located along Roscoe Boulevard, approximately 800 feet north of the subject site. Roscoe Boulevard is a six-lane arterial roadway that EcoTierra estimates with noise levels that exceed 60 dBA L_{eq} during the daytime hours in which project construction would occur. Given the 800-foot minimum project-to-receptor distance, worst-case noise levels from the project's construction activities would be below 45 dBA L_{eq} at the nearest noise-sensitive residential land uses along Roscoe Boulevard (**see Appendix M – Noise Data**). This is far below existing ambient noise conditions along Roscoe Boulevard in this location, which is assumed to be 60 dBA L_{eq} . Corresponding noise increases at the noise-sensitive residential uses would be just fractions of a decibel and well-below the 5 dBA increase threshold of significance. Overall, the project's construction noises would be mostly inaudible at these distant residential land uses, and occasionally audible construction noises (if they occur) would not be capable of contributing to substantially louder noise conditions.

Trucks and other construction-related vehicles would access the subject site over the course of all construction phases. The proposed project's maximum construction truck trip generation would occur during its demolition phase, when EcoTierra conservatively estimates that up to 46 haul truck trips per day (23 inbound and 23 outbound) would assist in removing demolition debris from the subject site. This level of haul truck activity, approximately six trips per hour, assuming a standard eight-hour workday, would have a minimal effect on roadside ambient noise levels along Woodley Avenue, Roscoe Boulevard, and other truck routes that would be utilized by the proposed project's haul trips, as these roadways carry hundreds of vehicle trips per hour during the hours in which construction would occur. Any truck-related increases would be well below the 5 dBA L_{eq} increase threshold of significance, which requires more than a doubling of hourly traffic volumes to occur.

There are no noise-sensitive receptors along Raymer Street. Land uses along Raymer Street are limited to non-sensitive commercial and light industrial uses.

The proposed project's potential on-site operational noise sources are identified and discussed below:

Mechanical Equipment - Given the relatively quiet operation of modern HVAC systems and elevated surrounding ambient noise levels due to the subject sites proximity to the Van Nuys Airport and light industrial land uses, it is unlikely that the project's HVAC systems would be capable of increasing off-site ambient noise levels by a discernable degree. At the nearest residential land uses that are located approximately 800 feet north of the subject site along Roscoe Boulevard, noise from the project's HVAC systems would be inaudible and well-below ambient noise levels and the City's noise ordinance standards. The project's HVAC systems would not contribute to measurable noise increases at these distant residential land uses.

Parking - The proposed project is estimated to generate a maximum of 29 vehicle trips per hour (**see Appendix E**). At the nearest residential land uses that are located approximately 800 feet north of the subject site along Roscoe Boulevard, the proposed project's parking-related noise would not contribute to measurable noise increases over any meaningful averaging period. Most parking-related noises would be inaudible.

Loading Dock – As previous stated, the nearest residential land uses are located approximately 800 feet north of the subject site along Roscoe Boulevard, and noise increases over any averaging period (e.g., hourly, daily, etc.) would be nominal and just fractions of a decibel. It is

unlikely that the project's loading-related noises would be audible at these distant residential land uses, especially given their location along a busy roadway.

Overall, the proposed project is located in a mixed-light industrial/commercial district and is consistent with surrounding land use types. The project would also replace an existing light industrial warehousing use that contains many of the same noise sources that the project proposes. The level of traffic generated by the project would have a nominal effect on roadside noise conditions along Roscoe Boulevard and Woodley Avenue, major roadways that carry hundreds of vehicle trips per hour. There are no noise-sensitive receptors along Raymer Street. Operations of the project would not alter the ambient noise conditions of its surroundings by a substantial degree, and its effect at distant residential land uses that are 800 feet away and located along a busy roadway would be nominal at most. The project would not result in daily noise increases exceeding the minimum 3 dBA CNEL threshold of significance, or 5 dBA increases averaged over any appreciable time period according to EcoTierra.

Therefore, with the implementation of Code requirements and the mitigation measure herein, any impacts due to the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be reduced to a less than significant impact.

Mitigation Measure Noise – 1. Increased Noise Levels (Construction Activities)

- Construction shall be restricted to the hours of 7:00 am to 9:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

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

Less Than Significant Impact. For the evaluation of construction and operational-related vibration impacts, the Federal Transit Administration's (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction and other activities. Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table 8** shows the FTA's vibration guidelines for building and structural damage.

Table 8
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2

Table 8
FTA Construction Vibration Damage Criteria

IV. Buildings extremely susceptible to vibration damage	0.12
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.</i>	

The project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at nearby buildings, as shown in **Appendix M**. The analysis is based on the principles and guidelines recommended by the FTA in its *2018 Transit Noise and Vibration Impact Assessment* manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories (see **Table XX**).

Significant sources of operational vibration are generally limited to heavy equipment or heavy industrial operations. The project proposes to construct a conventional tilt-up warehouse building to house light industrial or light manufacturing uses. Such heavy equipment and/or heavy industrial operations capable of generating substantial groundborne vibration levels would not take place at the subject site.

As explained earlier, construction of the proposed project – especially demolition and grading activities – would require a variety of heavy-duty earthmoving vehicles. According to the FTA's 2018 Transit Noise and Vibration Impact Assessment Manual, large bulldozers and similar heavy-equipment can generate groundborne vibration levels up to 0.089 in/sec PPV at a reference distance of 25 feet. There are two buildings located within 25 feet of the subject site: a commercial electric supply store located at 16301 Raymer Street, directly west of the subject site; and a used car dealership located at 16161 Raymer Street, directly east of the subject site. As shown in **Table 9**, operations of the proposed project's heavy-equipment near the site's western and eastern property lines adjacent to 16301 Raymer Street and 16161 Raymer Street (respectively) would not expose these buildings to groundborne vibration levels in excess of their 0.5 in/sec PPV FTA damage criteria. Both buildings are relatively modern structures that do not include fragile architectural features or other particularly vibration-sensitive elements.

Table 9
Building Damage Vibration Levels at Off-Site Structures

Off-Site Structures	Distance to Equipment ^A (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
16301 Raymer Street	10	I. Reinforced concrete, steel, or timber	0.5	0.244	No
16161 Raymer Street	10	I. Reinforced concrete, steel, or timber	0.5	0.244	No
<i>Note:</i> ^A Distance accounts for typical equipment setback (i.e., large earthmoving equipment associated with the 0.089 in/sec PPV reference vibration level would not operate directly on the Project's property lines). <i>Source: NTEC, 2023. Reference vibration levels obtained from the FTA's 2018 Transit Noise and Vibration Impact Assessment manual.</i>					

At more distant structures, the project's groundborne vibration levels from construction equipment would be even further reduced and would not exceed the FTA's minimum criteria for vibration damage.

The project would not contain significant stationary sources of vibration. The proposed project's zoning precludes the types of heavy industrial or manufacturing uses that may be associated with the generation of substantial groundborne vibration. Future light industrial or light manufacturing uses at the Project site may generate groundborne vibrations, but it is unrealistic to assume that any vibration would be potentially damaging or even perceptible at nearby structures, which would be over 50 feet from the footprint of the project's proposed tilt-up warehouse building. Surrounding buildings are similar industrial warehouse structures. The project would not accommodate industrial or manufacturing processes that compromise its own warehouse building, let alone similar off-site structures that are over 50 feet away.

Additionally, the project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration.

Therefore, neither the project's construction nor its operations would generate excessive groundborne vibration levels capable of damaging surrounding buildings and impacts would be less than significant.

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

Less Than Significant Impact. As noted earlier, the subject site is located less than 500 feet east and south of the Van Nuys Airport and is within the airport's influence area. According to the Los Angeles County ALUC, the project site is located near – but outside of – the airport's 65 dB CNEL contour, meaning that average daily noise conditions at the subject site are likely approximately 65 dB CNEL, or slightly lower. The Noise Appendix prepared for the proposed project (**see Appendix M**) shows that unmitigated construction equipment noise levels have a combined dBA Leq of 53.9 and an unmitigated construction noise level of 43.9 dBA Leq, which is below the airport's 65 db CNEL countour. Further, it is unlikely that project operations including but not limited to HVAC systems, traffic, parking, loading dock would meet or exceed 65 dB. As previously stated, any sensitive residential land uses are located approximately 800 feet away along Roscoe Boulevard and would not be impacted by project noise.

Therefore, the project would not expose people residing or working in the project area to excessive noise levels due to its location near Van Nuys Airport. Impacts would be less than significant and no mitigation is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction of the project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the proposed project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the project would be taken from the labor pool currently residing in the City. As such, it would not be expected that construction workers would relocate their homes as a result of employment on the proposed project.

The proposed approximately 123,464 square-foot single-story concrete tilt wall steel frame warehouse facility would include commercial uses and would employ approximately 79 employees on-site. While new employment opportunities would be created by the proposed development, it is anticipated that most of the expected employees would be drawn from the existing labor force in the region and would not require the need to relocate or place a demand for housing in the area.

According to Southern California Association of Governments (SCAG) most recent RTP/SCS projects population, housing, and employment data and estimates for the City between 2016 and 2045 (the regional planning horizon year). According to SCAG's 2020-2045 Regional

Transportation Plan/Sustainable Communities Strategy, Demographics & Growth Forecast Technical Report, the employment within the City by 2045 is projected to include an increase of 139,000 jobs in transportation and warehousing. The additional 79 on-site employees due to project operations is well within 139,000 jobs. Furthermore, the project does not include the extension of roads or other infrastructure, which could induce population growth. Therefore, projected employment growth associated with the proposed project would be less than significant.

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

No Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere.

The subject site is currently developed with warehouse uses and the proposed development will not result in the demolition of residential dwellings. Therefore, no people or housing would be displaced, and replacement housing would not be required. No impacts would occur, and no mitigation measures would be required.

XV. PUBLIC SERVICES

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

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

a) Fire protection?

Less Than Significant Impact. A project will normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Fire prevention, fire suppression, and life safety services in the City are provided by the City of Los Angeles Fire Department (LAFD).

The project site and the surrounding area are currently served by LAFD Los Angeles Fire Department Fire Station 90, located at 7921 Woodley Avenue (approximately 0.5 miles southeast of the project site). The proposed project would result in an increase in employment, which could increase the number of emergency calls and demand for LAFD fire and emergency services. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that there is an existing fire station in close proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The proposed project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, impacts would be less than significant, and no mitigation measures would be required.

b. Police protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed project, necessitating a new or physically altered station. The proposed project would result in a net increase employment and could increase demand for police service. The project site and the surrounding area are currently served by LAPD's Valley Bureau West Valley Community Police Station, located at 19020 Vanowen Street (approximately 5.5 miles southwest of the project site).

Prior to the issuance of a building permit, the LAPD would review the project plans to ensure that the design of the project follows the LAPD's Design Out Crime Program, an initiative that introduces the techniques of Crime Prevention Through Environmental Design (CPTED) to all City departments beyond the LAPD. Through the incorporation of these techniques into the project design, in combination with the safety features already incorporated into the proposed project, the proposed project would neither create capacity/service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Regarding operations, in the event a situation should arise requiring increased staffing or patrol units, additional resources can be called in. Therefore, the proposed project would result in a less than significant impact related to police protection services.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving a project site.

The project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, private schools and after-school programs. As shown in **Appendix N – LAUSD Schools Enrollments and Capacities Report**, the project site is currently served by three schools: (1) Cohasset Street Elementary School, which is under/over capacity and is not projected to be under/over capacity in the future; (2) Fulton College Prep, which is under/over capacity and is projected to be under/over capacity in the future; and (3) Birmingham Community Charter High School, which is not under/over capacity and is not projected to be under/over capacity in the future.

The project includes demolition and removal of the existing industrial space, landscaping and surface parking from the subject site for the development of a new warehouse facility. The project does not include any housing and would not employ a significant number of employees (estimated 79 employees); therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the Los Angeles Unified School District (LAUSD) in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the project. Therefore, any impacts related to an increased demand for school facilities would be less than significant.

d. Parks?

Less Than Significant Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. Information identifying neighborhood parks, community parks, and regional parks in proximity to the project site can be found in **Appendix O**.

The project includes the demolition of existing industrial space, landscaping and associated parking for the construction, use and maintenance of a warehouse facility. The project does not include any residential uses. Although the project would generate jobs for approximately 79 employees, any associated increase in demand for park services would be negligible. Therefore, impacts would be less than significant, and no mitigation measures would be required.

e. Other public facilities?

Less Than Significant Impact. A significant impact would occur if the proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts.

The project would involve demolition of approximately 48,944 square feet of industrial space with associated surface parking and landscaping for the construction, use, and maintenance of an approximately 123,464 square foot single story with mezzanine, maximum 52 feet in height warehouse facility on three lots totaling 240,365 square feet. As proposed, the project includes 8,000 square feet of office space, 4,000 square feet of which is proposed as office mezzanine space. The project is not expected to create a demand for library services as no new residential population would be generated. As such, the project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. Therefore, no significant impacts related to an increased demand for other public facilities, such as libraries, would occur under the project, and no mitigation measures would be required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. Information identifying neighborhood parks, community parks, and regional parks in proximity to the project site can be found in **Appendix O**.

The project includes the demolition of existing industrial space, landscaping and associated parking for the construction, use and maintenance of a warehouse facility. The project does not include any residential uses. Although the project would generate jobs for approximately 79 employees, any associated increase in demand for park services would be negligible. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. Information identifying neighborhood parks, community parks, and regional parks in proximity to the project site can be found in **Appendix O**.

The project includes the demolition of existing industrial space, landscaping and associated parking for the construction, use and maintenance of a warehouse facility. The project does not include any residential uses. Although the project would generate jobs for approximately 79

employees, any associated increase in demand for park services would be negligible. Therefore, impacts would be less than significant, and no mitigation measures would be required.

XVII. TRANSPORTATION

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

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

Less Than Significant Impact. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. On October 5, 2023, the Los Angeles Department of Transportation, LADOT (**see Appendix F**), reviewed the Transportation Assessment Report prepared for the proposed project by Armen Hovanessian Transportation Consulting, Inc. dated October 4, 2023 (**see Appendix E**) and found that the project's transportation impacts related to VMT are less than significant and no CEQA mitigation measures are required. It was determined that the project does exceed the net 250 daily vehicle trips threshold (net daily traffic flow for the project is calculated at 296 daily trips) but would not have a significant transportation impact that conflicts with plans, programs, ordinances, or policies. Per the Transportation Assessment Report prepared by Armen Hovanessian Transportation Consulting, Inc, the project is consistent with the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) plan. The project is also consistent with the City of Los Angeles General Plan including but not limited to the Mobility Plan 2035, Plan for a Healthy LA, the Los Angeles Municipal Code (Section 12.21 A.16); and the City's Vision Zero Action Plan. Therefore, the project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and there is less than significant impact to programs, plans, ordinances, and policies addressing the circulation system.

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

Less Than Significant Impact. A significant impact may occur if the proposed project individually or cumulatively exceeded the service standards of the Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program (CMP). This program was created Statewide as a result of Proposition 111 and has been implemented locally by Metro. The CMP for Los Angeles County requires that the traffic impacts of individual development projects of potential regional significance be analyzed. Specific arterial roadways and all State highways comprise the CMP system, and a total of 164 intersections are identified for monitoring throughout Los Angeles County. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add more than 50 trips during either the a.m. or p.m. peak hours.

On October 5, 2023, the Los Angeles Department of Transportation, LADOT, (**see Appendix F**) reviewed the Transportation Assessment Report prepared for the proposed project by Armen Hovanessian Transportation Consulting, Inc. dated October 4, 2023 (**see Appendix E**) and found that the project's transportation impacts related to VMT are less than significant and no CEQA mitigation measures are required. It was determined that the project does exceed the net 250 daily vehicle trips threshold (net daily traffic flow for the project is calculated at 296 daily trips) but would not have a significant transportation impact that conflicts with plans, programs, ordinances, or policies. Therefore, LADOT concluded that implementation of the project would result in no significant VMT impact. Additionally, projects that generate more than 500 daily vehicle trips shall be required to perform an access and circulation analysis to determine if any access enhancements, transit amenities, intersection improvements, traffic signal upgrades, neighborhood traffic calming, or other improvements are needed. It was determined that the subject project traffic will not exceed 500 daily vehicle trips. Therefore, a circulation analysis is not required. As such, LADOT determined that no CEQA mitigation requirements are required for this project. Therefore, less than significant impacts would occur as a result of conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b).

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

No Impact. A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions.

The project proposes a land use that would complement the surrounding urban development and utilizes the existing roadway network. Vehicular access would be from the existing driveways on to Raymer Street, a two-way street. The project's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Finally, on October 5, 2023, LADOT determined that no CEQA mitigation requirements are required for this project (**see Appendix F**). Therefore, no impacts would occur and no mitigation measures would be required.

d. Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. Updates to the City of Los Angeles Safety Element were adopted in November 2021. The Safety Element

references the City's Emergency Management Department 2018 Local Hazard Mitigation Plan (LHMP). The LHMP identifies Critical Facilities and Infrastructure including critical response facilities and critical infrastructure (transportation and utilities). Due to the sensitivity of this information, a detailed list of facilities is not provided therein. Based on the available information, the proposed project would not impair or physically interfere with an adopted emergency response or emergency evacuation plan. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, there is no information to indicate that the proposed project would result in inadequate emergency access or interfere with an emergency response plan or emergency evacuation plan. Further, the project has incorporated the following Project Design Feature ("PDF") to avoid or minimize adverse construction related impacts. Therefore, less than significant impacts would occur.

PDF TR-1:

Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan ("CSTMP") would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CSTMP would formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CSTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project shall be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. All construction related truck traffic will be restricted to off-peak hours. The CSTMP would include, but not be limited to, the following elements as appropriate:

- Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets shall be prohibited.
- Worker parking shall be provided on-site or in designated off-site public parking areas.

- Temporary traffic control during construction activities adjacent to public rights-of-way shall be provided on an as needed basis to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., shall be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles shall be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists shall be obtained through such measures as alternate routing and protection barriers as appropriate.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians shall be routed around any such lane or sidewalk closures.
- The locations of the off-site truck staging shall be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods.
- There would be coordination with nearby projects, that have potential overlapping construction timeframes, to schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

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

Less Than Significant Impact With Mitigation. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice.

A California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) records search (SCCIC File #: 25414.11399) was provided by the California State University, Fullerton, Department of Anthropology dated October 9, 2023 (**see Appendix C**). The report states that no archaeological resources are recorded in the project area or within a specified

radius (0.5 mile radius) around the project area. However, the report also states that resources may exist, because the area has not been studied and/or that no information regarding the archaeological sensitivity of the property has been filed to the knowledge of the SCCIC. Furthermore, the SCCIC report states that a records search results does not preclude the possibility that surface or buried artifacts might be found during a survey of the property or ground-disturbing activities. According to the CHRIS search, the project site has not been subjected to any previous studies and the cultural resource sensitivity of the project site is unknown. Although the project site is currently developed, there is the potential for the discovery of prehistoric and historic cultural resources within the project boundaries. Therefore, the CHRIS search recommendations include customary caution and a halt-work condition to be in place for any ground-disturbing activities including an assessment and recommendations by a qualified archaeological consultant as well as consultation with the Native American Heritage Commission.

On April 9, 2024, notification was mailed to 11 Tribes that are traditionally and culturally affiliated with the geographic area associated with the proposed project. On May 10, 2024, Planning staff received a request for consultation from the Gabrieleño Band of Mission Indians - Kizh Nation. Consultation began on May 14, 2024 with Department of City Planning staff and Tribal members. During the consultation, the Tribe discussed the regional significance of the project site due to the proximity to adjacent sacred water courses and major traditional trade routes. Furthermore, the Tribe provided confidential maps that show the Tribe was located in proximity to the subject site via email (May 17, 2024). Consultation continued until July 24, 2024 when the City closed consultation and stated its intent to use the requested Tribal mitigation measures and provided a copy of the mitigation measure. As mitigated herein, any impacts to Tribal cultural resources are less than significant.

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

- The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human

remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

- On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).

- Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

- Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

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

in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation. See a) above.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for domestic water systems and for fire flow to the subject area. In a letter dated October 11, 2023, LADWP which is by reference incorporated herein (**See Appendix Q**), states that generally, projects that conform to the demographic projection from RTP/SCS by SCAG and are currently located within the City's service area are considered to have been included in LADWP's water supply planning efforts; therefore, the projected water supplies would meet projected demands. Further, if the proposed project is within the City's General Plan and C4 Zone's allowable use and area limits, LADWP should be able to provide the domestic needs of the project from the existing water system. As stated elsewhere herein, the project is within SCAG's demographic projections; the project is located within the City's service area. The decision maker for the project will determine whether the project conforms with the City's General Plan and C4 Zone. The project will comply with all applicable regulations at the time of Plan Check including but not limited to the following: LAFD regulations for the construction and provision of fire hydrants and LADWP requirements for the installation of water distribution lines. As such, the construction of new water facilities would not result in significant environmental effects.

Wastewater Facilities

The City's Bureau of Sanitation provides sewer service to the project area. The project site currently has existing sewer connections to the City's sewer system. In a letter dated September 26, 2023 (**see Appendix R**), Los Angeles Sanitation estimated that the existing sewer system may be able to accommodate the proposed project. However, if the public sewer lacks sufficient capacity, the developer will be required to build sewer lines. Ultimately, sewage flow will be conveyed to the Hyperion Water Reclamation Plant which has sufficient capacity for the project. The September 26, 2023 Bureau of Sanitation letter is by reference incorporated herein. The applicant will comply with all regulatory compliance measures for the construction of any sewer lines.

Stormwater Drainage Facilities

As discussed in **Checklist Question X.C(ii), Hydrology and Water Quality**, a project-specific Stormwater Pollution Prevention Program (SWPP) would be implemented during the operation of the project. Accordingly, runoff flow would be reduced as a result of the project, consistent with the requirements of the NPDES permit and LID Ordinance, which require a reduction of the volume of runoff from the project site when compared to existing conditions. Accordingly, the existing stormwater drainage would have sufficient capacity to receive the project's post-development runoff. As such, stormwater runoff from the project site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the project applicant shall be responsible for the improvements, and such improvements would be conducted as part of the project either on-site or off-site within the right-of-way, and as such, any related construction activities would be temporary and of short duration. As such, the construction of new stormwater drainage facilities would not result in significant environmental effects.

Electric Power Facilities

The LADWP would supply the project from the existing electrical system. Electricity demand during construction would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. As detailed in **Checklist Question VI. Energy**, the project's operational electricity demand would represent an insignificant percentage of LADWP's available supplies and would not require new or expanded electrical supplies. However, the project may require underground line extensions on public street.

All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP and a Work Area Traffic Control Plan for use during the entire construction period would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to the electrical system.

Natural Gas Facilities

SoCalGas supplies natural gas to the project area. The project would not use any natural gas appliances. As such, there would be no need for the construction of new natural gas facilities and there would be no impact.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the project applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects.

Accordingly, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Further, any construction related impacts will be reduced with the implementation of the Transportation Project Design Feature (TR-1) discussed elsewhere herein (**see XVII. Transportation**). Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. Correspondence from LADWP (**see Appendix Q**) states that generally, projects that conform to the demographic projection from RTP/SCS by SCAG and are currently located within the City's service area are considered to have been included in LADWP's water supply planning efforts; therefore, the projected water supplies would

meet projected demands. Further, if the proposed project is within the City's General Plan and C4 Zone's allowable use and area limits, LADWP should be able to provide the domestic needs of the project from the existing water system. As stated elsewhere herein, the project is within SCAG's demographic projections; the project is located within the City's service area. The decision maker for the project will determine whether the project conforms with the City's General Plan and C4 Zone. Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project. Therefore, the proposed project would have less than significant impact related to water supplies

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving a project site would be exceeded.

The City's Bureau of Sanitation provides sewer service to the project area. The project site currently has existing sewer connections to the City's sewer system. In a letter dated September 26, 2023 (**see Appendix R**), Los Angeles Sanitation estimated that the existing sewer system may be able to accommodate the proposed project. However, if the public sewer lacks sufficient capacity, the developer will be required to build sewer lines. Ultimately, sewage flow will be conveyed to the Hyperion Water Reclamation Plant which has sufficient capacity for the project. In addition, all wastewater from the project will be treated in accordance with the requirements of the Los Angeles Regional Water Quality Control Board. The project is entirely consistent with the applicable City long-range and development plans and projected growth, and thus alone will not likely exceed the capacity of the existing system. Prior to any construction activities, the applicant will be required to coordinate with the Los Angeles Bureau of Sanitation to determine the exact wastewater conveyance requirements of the proposed project. Any upgrades to the wastewater infrastructure in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as a part of the development. Therefore, the project will have a less than significant impact on wastewater capacity.

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

Less Than Significant Impact. A significant impact may occur if the amount of solid waste that the project would generate would exceed the capacity of existing infrastructure. The Los Angeles Bureau of Sanitation and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the project site. The entire Southern California region is served by an extensive network of landfills and other waste disposal methods. Although the project proposes to intensify the existing industrial use on the subject property, it is unlikely to generate such a substantial increase in waste that would exceed the capacity of the existing waste disposal system. The project will comply with all applicable federal, State, and local regulations involving solid waste. Therefore, the project will have a less than significant impact on the generation of solid waste.

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

Less Than Significant Impact. A significant impact may occur if the project would conflict with any statutes and regulations governing solid waste. The Los Angeles Bureau of Sanitation and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the project site. The entire Southern California region is served by an extensive network of landfills and other waste disposal methods. Although the project proposes to intensify the existing industrial use on the subject property, it is unlikely to generate such a substantial increase in waste that would exceed the capacity of the existing waste disposal system. The project will comply with all applicable federal, State, and local regulations involving solid waste. Therefore, the project will have a less than significant impact on statutes and regulations governing solid waste.

XX. WILDFIRE

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

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Updates to the City of Los Angeles Safety Element were adopted in November 2021. The Safety Element references the City's Emergency Management Department 2018 Local Hazard Mitigation Plan (LHMP). The LHMP identifies Critical Facilities and Infrastructure including critical response facilities and critical infrastructure (transportation and utilities). The City of Los Angeles Emergency Management Department coordinates with City departments, municipalities, and community-based organizations to ensure that the City and its residents have the resources to prepare, respond, and recover from emergencies, disasters and significant events. The City's Emergency Operations Organization comprises all agencies of the City's government, including Fire. Therefore, the construction of a 123,464 square foot warehouse facility will not significantly impair any adopted emergency response plan or emergency evacuation.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. A significant impact would occur if the proposed project exposed people to pollutant concentrations from a wildfire. The greatest wildfire risks are in areas designated as a Very High Fire Severity Zone, High Wind Velocity Area, and Hillside areas. The subject site is not located within a Very High Fire Severity Zone, High Wind Velocity Area, or Hillside area. The subject site is located on three adjacent, flat in-fill sites that are surrounded by improved properties. The project site is located in the San Fernando Valley which is surrounded by mountain ranges on all sides (Santa Susana Mountains to the northwest, Simi Hills to the west, Santa Monica Mountains to the south, Verdugo Mountains to the east, San Gabriel Mountains to the northeast). It is possible that pollutant concentrations from wildfires in mountain ranges surrounding the San Fernando Valley could negatively impact the subject site. Impacts to project residents due to pollutant concentrations can be mitigated on an as needed basis by closing windows and using individual air filtration devices. Therefore, the impact of a possible spread of a wildfire would be less than significant.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. The project would involve the demolition of 48,944 square feet of industrial space, associated parking and landscaping for the construction use and maintenance of a 123,464 square foot single story with mezzanine, 52 feet in height warehouse facility in a highly urbanized area of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. Hydrants, water lines, and water tanks would be installed per Fire Code requirements. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the project would not create any undue fire hazard. Automatic fire sprinkler systems are also required for the proposed land uses as part of the project. Compliance with all building code, developmental regulations, and utility providers' requirements and policies would ensure that the project would not exacerbate fire risks and impacts would be less than significant.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes. The project site is located on a flat lot and is not in a designated Hillside area. Furthermore, the site is not designated as a Landslide area and is outside of a flood zone. The project would be required to comply with all

developmental regulations, City building codes, and regulatory compliance measures with regard to fire safety. Therefore, impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. Based on the analysis of this Initial Study and as mitigated, the proposed project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Implementation of the mitigation measures identified and compliance with existing regulations would reduce impacts to less than significant levels.

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the proposed project, in conjunction with the related products, would result in impacts that are less than significant when viewed separately, but significant when viewed together. Although other projects may be constructed in the project vicinity, the cumulative impacts to which the proposed project would contribute would be less than significant. Implementation of the mitigation measures identified would reduce cumulative impacts to less than significant levels.

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

Less Than Significant Impact. A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the proposed project have been identified, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant levels. Upon implementation of mitigation measures identified and compliance with existing regulations, the proposed project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly.

5 PREPARERS AND PERSONS CONSULTED

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Los Angeles Department of Transportation

Leighton Consultants

Los Angeles Department of Building and Safety (Grading Division)

Los Angeles Bureau of Engineering

Natural History Museum of Los Angeles County

Nv5

Kimley-Horn and Associates, Inc.

Gabrieleño Band of Mission Indians - Kizh Nation

Los Angeles Unified School District

Los Angeles Recreation and Parks

Los Angeles Public Library

Los Angeles Department of Water and Power

Los Angeles Sanitation and Environment

6 REFERENCES, ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM	Asbestos Containing Materials
AOC	Areas of Concern
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
BOE	Bureau of Engineering
BPW	Board of Public Works
CA FID	California Facility Inventory Database
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City	City of Los Angeles, California
CIWQS	California Integrated Water Quality System
CNEL	Community Noise Exposure
CoIWMP	Los Angeles County Integrated Waste Management Plan
CREC	Controlled Recognized Environmental Conditions
CUGU	Clean Up-Green Up
CY	Cubic Yards
DTSC	Department of Toxic Substances Control's
DWP	City of Los Angeles Department of Water and Power
ECHO	Enforcement and Compliance History Information
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EPA	Environmental Protection Agency

ESA	Environmental Site Assessment
ETK	Transitional Kindergarten
EV	All Electric Vehicles
EWMP	Enhanced Watershed Management Programs
FAR	Floor-to-area ratio
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System/Facility Registry System
GHG	Greenhouse gas(es)
GPR	Ground-Penetrating Radar
HAZMAT	Hazardous Materials Reporting Facility
HAZNET	Facility and Manifest Data
HIST	Historic
HPOZ	Historic Preservation Overlay Zone
HREC	Historical Recognized Environmental Conditions
HVAC	Heating, Ventilation and Air Conditioning
HWTS	Hazardous Waste Tracking System
LBP	Lead Based Paint
LADBS	Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADRP	City of Los Angeles Department of Recreation and Parks
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	City of Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LID	Low Impact Development
MWELO	Model Water Efficient Landscape Ordinance
MPOs	California Metropolitan Planning Organizations

MRZ	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollution Discharge Elimination System
NOP	Notice of Preparation
O & M	Operations and Maintenance
PM _{2.5}	Fine Particulate Matter
PM ₁₀	Particulate Matter
PRC	Public Resource Code
PSF	Pounds per Square Foot of Pressure
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SIP	State Implementation Plan
Siting Element	Countywide Siting Element
SQG	Small Quantity Hazardous Waste Generator
SRRE	City of Los Angeles Source Reduction and Recycling Element
STLC	Soluble Threshold Limit Concentration
SUSMP	Standard Urban Stormwater Mitigation Plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	Stormwater Pollution Prevention Program
SWIRP	Solid Waste Integrated Resources Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Load
TPA	Transit Priority Area
TPH	Total Petroleum Hydrocarbons

USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VRF	Variable Refrigerant Flow
WSA	Water Supply Assessment
ZI	Zoning Information