LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

9000 Airport Boulevard

Case Number: ENV-2023-6757-EIR

Project Location: 9000-9160 South Airport Boulevard; 5801-5881 West Arbor Vitae Street; 5820-5880 West Interceptor Street; 8941 and 8940-9000 South Interceptor Street; Los Angeles, California 90045

Community Plan Area: Westchester–Playa del Rey Community Plan Area

Council District: 11—Park

Project Description: The 9000 Airport Boulevard Project (Project) would develop up to 435,390 square feet of industrial uses on an approximately 18-acre site. The Project includes two options: Option 1 would develop one building comprised of up to 435,390 square feet of industrial floor area and a maximum building height of 50 feet. Option 2 would develop three buildings comprised of up to 410,056 square feet of industrial floor area a maximum building height of 46 feet. The Project would include truck trailer parking spaces and vehicle parking spaces under Option 1, and vehicle parking spaces under Option 2. A total of 37,860 square feet of existing commercial/industrial floor area uses and associated surface parking areas would be demolished.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Rexford Industrial–9000 Airport, LLC.

August 2024

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1 INTRODUCTION

An application for the proposed 9000 Airport Boulevard (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City has determined to use Appendix G of the State CEQA Guidelines as the thresholds of significance for the Project unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and that the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (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 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 shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C)
(Footnote continued on next page)

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the

Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**9000 Airport Boulevard**
ENVIRONMENTAL CASE NO.	ENV-2023-6757-EIR
RELATED CASES	CPC-2023-6756-CU-SPR
PROJECT LOCATION	9000-9160 South Airport Boulevard; 5801-5881 West Arbor Vitae Street; 5820-5880 West Interceptor Street; 8941 and 8940-9000 South Interceptor Street, Los Angeles, California 90045
COMMUNITY PLAN AREA	Westchester–Playa del Rey
GENERAL PLAN DESIGNATION	Limited Manufacturing
ZONING	[T][Q]M1-1
COUNCIL DISTRICT	11—Park
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Kiersten Turner, Planning Assistant
ADDRESS	221 North Figueroa Street, Suite 1350 Los Angeles, CA 90012
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APPLICANT	**REXFORD INDUSTRIAL—9000 AIRPORT, LLC**
ADDRESS	11620 Wilshire Boulevard, Suite 1000, Los Angeles, CA 90025
PHONE NUMBER	(310) 966-3812

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Kiersten Turner, Planning Assistant	August 21, 2024
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 9000 Airport Boulevard Project (Project) would develop up to 435,390 square feet of industrial uses on an approximately 18-acre site. The Project includes two options: Option 1 would develop one building comprised of up to 435,390 square feet of industrial floor area and a maximum building height of 50 feet. Option 2 would develop three buildings comprised of up to 410,056 square feet of industrial floor area and a maximum building height of 46 feet. The Project would include truck trailer parking spaces and vehicle parking spaces under Option 1, and vehicle parking spaces under Option 2. A total of 37,860 square feet of existing commercial/industrial floor area uses and associated surface parking areas would be demolished.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 9000-9160 South Airport Boulevard; 5801-5881 West Arbor Vitae Street; 5820-5880 West Interceptor Street; 8941 and 8940-9000 South Interceptor Street, within the Westchester–Playa del Rey Community Plan area of the City.[2] As shown in Figure 1 on page 8, the Project Site is bounded by South Interceptor Street to the north, West Arbor Vitae Street to the south, residential uses and surface parking to the east, and South Airport Boulevard to the west.

Local vehicular and pedestrian access to the Project Site is provided by Sepulveda Boulevard and Westchester Parkway located west of the Project Site, and La Cienega Boulevard located east of the Project Site. Primary regional vehicular access to the Project Site is provided by the San Diego Freeway (I-405), which is located approximately 0.8 miles east of the Project Site. The Project Site is served by several local and regional bus lines as well as rail lines serviced by the Los Angeles County Metropolitan Transit Authority (Metro). In particular, the Project Site is located within 0.5 miles of Metro Line 111 located at the intersection of Westchester Parkway and Airport Boulevard, Metro Line 115 located at the intersection of Manchester Avenue and Belford Avenue and approximately 0.7 miles southwest of the existing Metro K Line Westchester/Veterans station. Furthermore, the Project Site is located less than 0.4 miles northeast of the future LAX Automated People Mover Intermodal Transportation Facility station expected to be completed in 2025 and less than 0.4 miles northwest of the future expansion of the Metro K-Line LAX/Metro Transit Center station, which is currently under construction and anticipated to be completed in 2024.[3]

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[2] The Westchester–Playa del Rey Community Plan is one of the four Westside community plans currently being updated with the City of Los Angeles Department of City Planning.

[3] LA Metro, Ride the K!, https://kline.metro.net/, accessed August 13, 2024

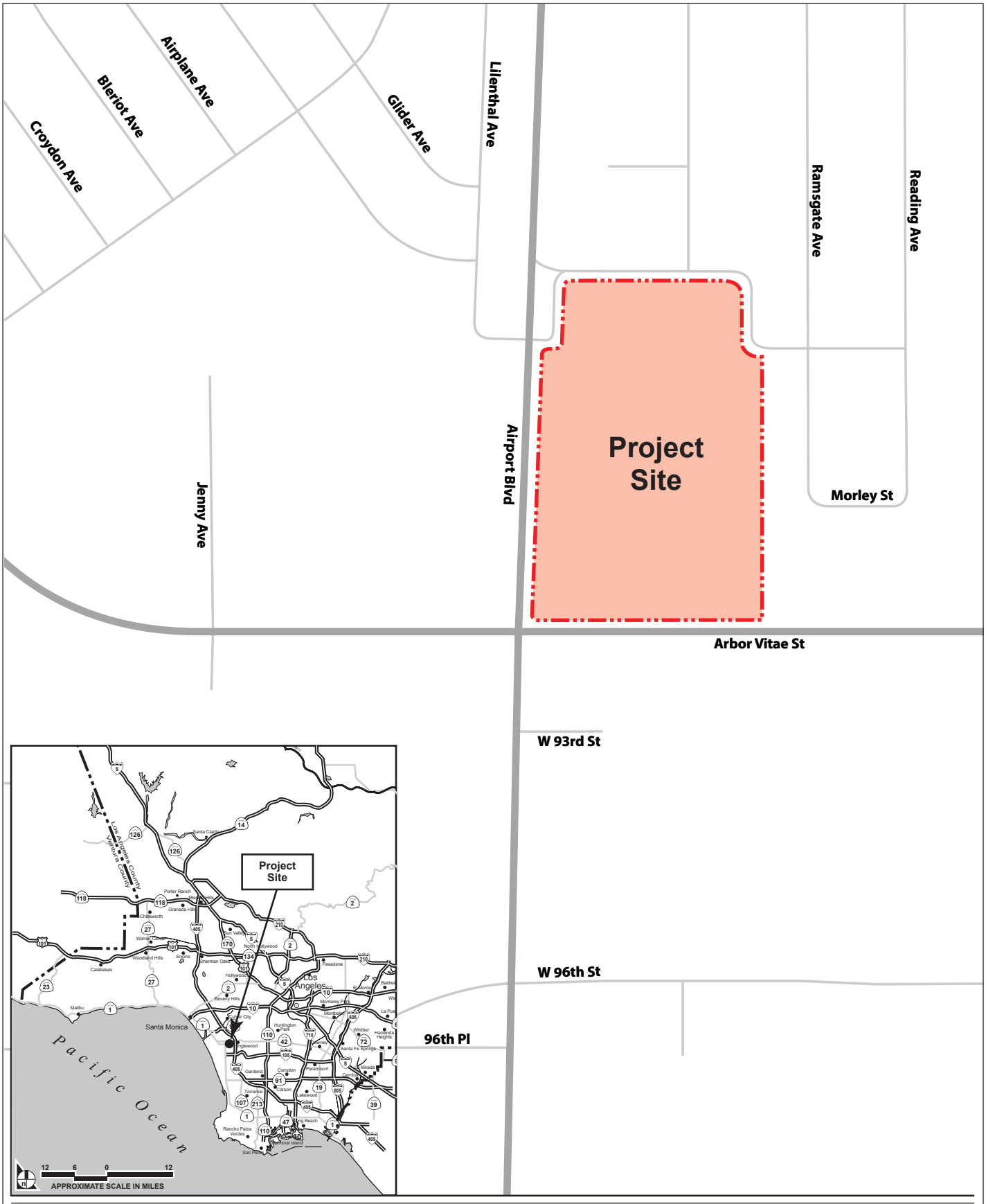

Figure 1
Project Location Map

Source: Eyestone Environmental, 2023.

3.2.2 Existing Conditions

3.2.2.1 Existing Project Site Conditions

As shown in Figure 2 on page 10, the Project Site is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings with maintenance facilities and office uses, as well as surface parking. Additionally, the Project Site contains accessory structures including a carwash, solar panel canopies, and fueling station canopies. Access to the Project Site is provided via vehicle ingress/egress along Interceptor Street and egress onto Arbor Vitae Street, as well as bus ingress along Airport Boulevard and egress along Arbor Vitae Street. The perimeter of the Project Site is secured with chain link fencing and concrete block walls. Further, two, double-sided advertising billboards are located within the Project Site boundaries along Airport Boulevard.

Existing landscaping within the Project Site includes 146 on-site non-protected trees and 14 street trees within the public right of way surrounding the Project Site. Existing on-site and street trees include species such as Shamel Ash, Queen Palms, Canary Pines, Weeping Figs, and Jacaranda. Based on the Tree Inventory Report included in Appendix IS-1 of this Initial Study, none of the street trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[4,5]

3.2.2.2 Land Use and Zoning Designations

The Project Site is located within the Westchester–Playa del Rey Community Plan area. The Project Site is designated as Limited Manufacturing and is zoned as [T][Q]M1-1 (Limited Industrial, Height District No. 1). The M1 Zone permits a wide array of land uses. Specifically, the M1 Zone permits any land use permitted in the MR1 and C2 zones, in addition to other specified uses including, but not limited to, foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District No. 1. All uses located in the M1 Zone and within Height District No. 1 are restricted to a maximum floor area ratio of 1.5:1.[6] Accordingly, buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5:1, the Project Site's 789,989 square feet of lot area/buildable area would permit up to 1,184,984 square feet of floor area. Height District No. 1 within the M1 Zone normally imposes no height limitation, however, the Project Site is subject to the Commercial Corner Development height limit of 45 feet as established by the City of Los Angeles Municipal Code (LAMC) Section 12.22 A.23.

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4 Arborist Tree Survey and Report for Rexford LAX Industrial Project 9000 Airport Boulevard Los Angeles, California, Steve F. Anderson / Arborist Services, February 2024. See Appendix IS-1 of this Initial Study.

5 Pursuant to Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.

6 FAR and height restrictions can be found at LAMC Section 12.21.1 A.1.

Figure 2
Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2023; Eyestone Environmental, 2023.

The M1 zone does not impose any setback requirements for commercial or industrial uses. However, the Project Site is subject to "Q" Conditions established by Ordinance No. 167,642, adopted in 1992, which changed the zone to [T][Q] M1-1 and incorporated "Q" Conditions in Section 2 of Ordinance No. 151,439.[7,89] The site's "Q" Conditions generally include provisions to setbacks, noise conditions, traffic congestion, and landscaping requirements. Specifically, with regard to setbacks, an approximately 15-foot landscaped setback shall be provided along portions of the northern and western boundaries of the Project Site along Interceptor Street; the existing seven-foot landscaped setback along Interceptor Street on the east boundary shall be preserved and maintained; a minimum ten-foot landscaped setback shall be provided along both Airport Boulevard and Arbor Vitae Street; and a minimum five-foot setback shall be provided along the east property line contiguous to the R3-1 zone to include trees. No new building or structure shall be built within 50 feet of the northerly or easterly property line adjacent to or across the street from an R3-1 zoned lot.

The Project Site is also located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code (PRC) Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Employment center projects are projects located on property zoned for commercial uses and within a TPA, and with a floor area ratio of not less than 0.75, and TPAs are defined as areas within 0.5 miles of a major transit stop that are existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted Transportation Improvement Program (TIP) (PRC, Section 21099). The Project Site is also within the boundaries of the Los Angeles Coastal Transportation Corridor Specific Plan established pursuant to Ordinance No. 168,999, effective on September 22, 1993, and amended pursuant to Ordinance Nos, 186,104 and 186,105 on June 28, 2019.[10] Additionally, the Project Site is located within the boundaries of the Los Angeles State Enterprise Zone.

3.2.3 Surrounding Land Uses

As shown in Figure 2, on page 10, the Project Site is located in an urbanized area that includes a mix of low-rise buildings containing industrial, residential, and commercial uses. The land uses surrounding the Project Site include Airport Landside, Limited Industrial, Light Manufacturing, Limited Manufacturing, Medium Residential, and Low Residential and have varying zoning designations, including LAX, M1-1, M2-1, MR1-1, R3-1, and R1-1. Directly north of the Project Site, across Interceptor Street, are properties zoned R3-1 with single- and multi-family residential uses. To the east of the Project Site are properties zoned R3-1 and MR-1, which include single-and multi-family residential uses and a car rental facility. To the west of the Project Site, across Airport Boulevard, are properties zoned R1-1 and LAX (as an indication of inclusion in the LAX Los Angeles International Airport Specific Plan), which include surface parking and single-family residential. To the south, across Arbor Vitae Street, are properties zoned LAX and MR-1, which include a motel, a restaurant, and the LAX People Mover maintenance

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7 Ordinance No. 167,642, adopted by the City Council on February 21, 1992.

8 Ordinance No. 151,439, approved by the City Council on September 19,1978.

9 Based on email correspondence with the Department of City Planning on November 17, 2023, although the [T] symbol is present in the zoning, there are no [T] conditions associated with the Project Site.

10 City of Los Angeles, Coastal Transportation Corridor Specific Plan, effective September 22, 1993, amended June 28, 2019.

yard. The LAX People Mover is expected to have elevated tracks up to 50 feet in height running along 96th Street, and will connect the Metro K Line to the LAX Airport. It is currently under construction with completion expected in 2025.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As shown in Figure 3 and Figure 4 on page 13 and page 14 respectively, the Project would consist of one industrial building (Option 1), or three industrial buildings (Option 2). As detailed in Table 1 on page 15, under Option 1, the Project would be comprised of 355,390 square feet of warehouse floor area and 80,000 square feet of associated office floor area for a total floor area of 435,390 square feet with a FAR of approximately 0.6:1. As shown in Figure 5 on page 16, the industrial building under Option 1 would be 50 feet in height and comprised of one level with a 40,000 square foot office mezzanine level located above the ground level office use.

Under Option 2, the Project would be comprised of 320,056 square feet of warehouse floor area and 90,000 square feet of associated office floor area for a total floor area of 410,056 with a FAR of approximately 0.5:1. The industrial building on the northern portion of the Project Site (Building 1) would have a floor area of 117,930 square feet comprised of 87,930 square feet of warehouse floor area and 30,000 square feet of office floor area. The industrial building on the western portion of the Project Site (Building 2) would have a floor area of 154,083 square feet comprised of 124,083 square feet of warehouse floor area and 30,000 square feet of office floor area. The industrial building on the eastern portion of the Project Site (Building 3) would have a floor area of 138,043 square feet comprised of 108,043 square feet of warehouse floor area and 30,000 square feet of office floor area. As shown on Figure 6 through Figure 8 on pages 17 through 19, respectively, all three industrial buildings under Option 2 would be 46 feet in height comprised of one level with a 15,000 square foot office mezzanine level above the ground level office use.

The Project would include surface parking with 288 vehicle parking spaces and 90 trailer parking spaces under Option 1, and 369 vehicle parking spaces under Option 2. In addition, 96 bicycle spaces would be provided under Option 1, and 91 bicycle parking spaces would be provided under Option 2. A total of 37,860 square feet of existing commercial and industrial uses and associated surface parking areas would be demolished to accommodate the Project.

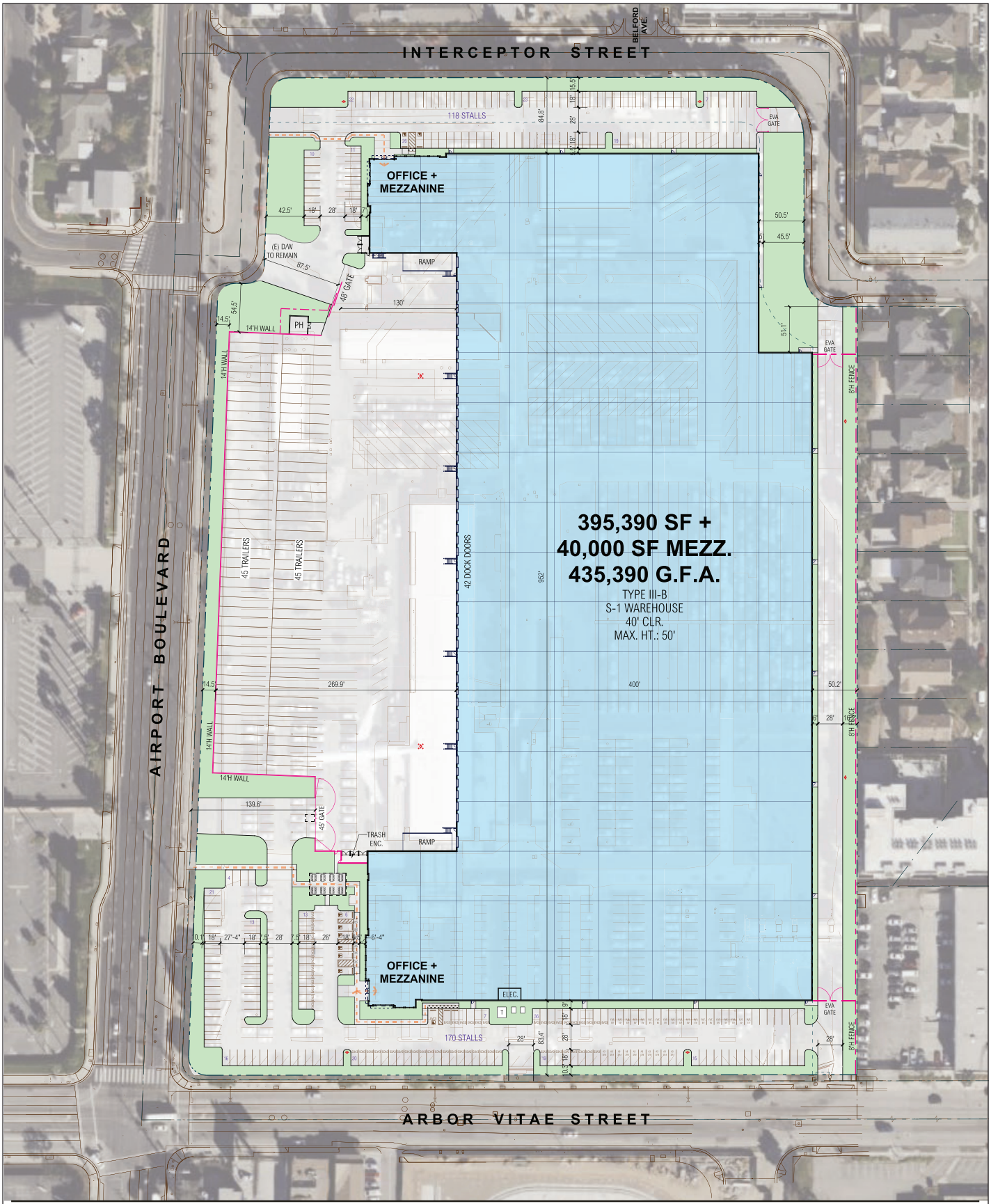


Figure 3

Conceptual Site Plan - Option 1

Source: RGA Office of Architectural Design, 2024.

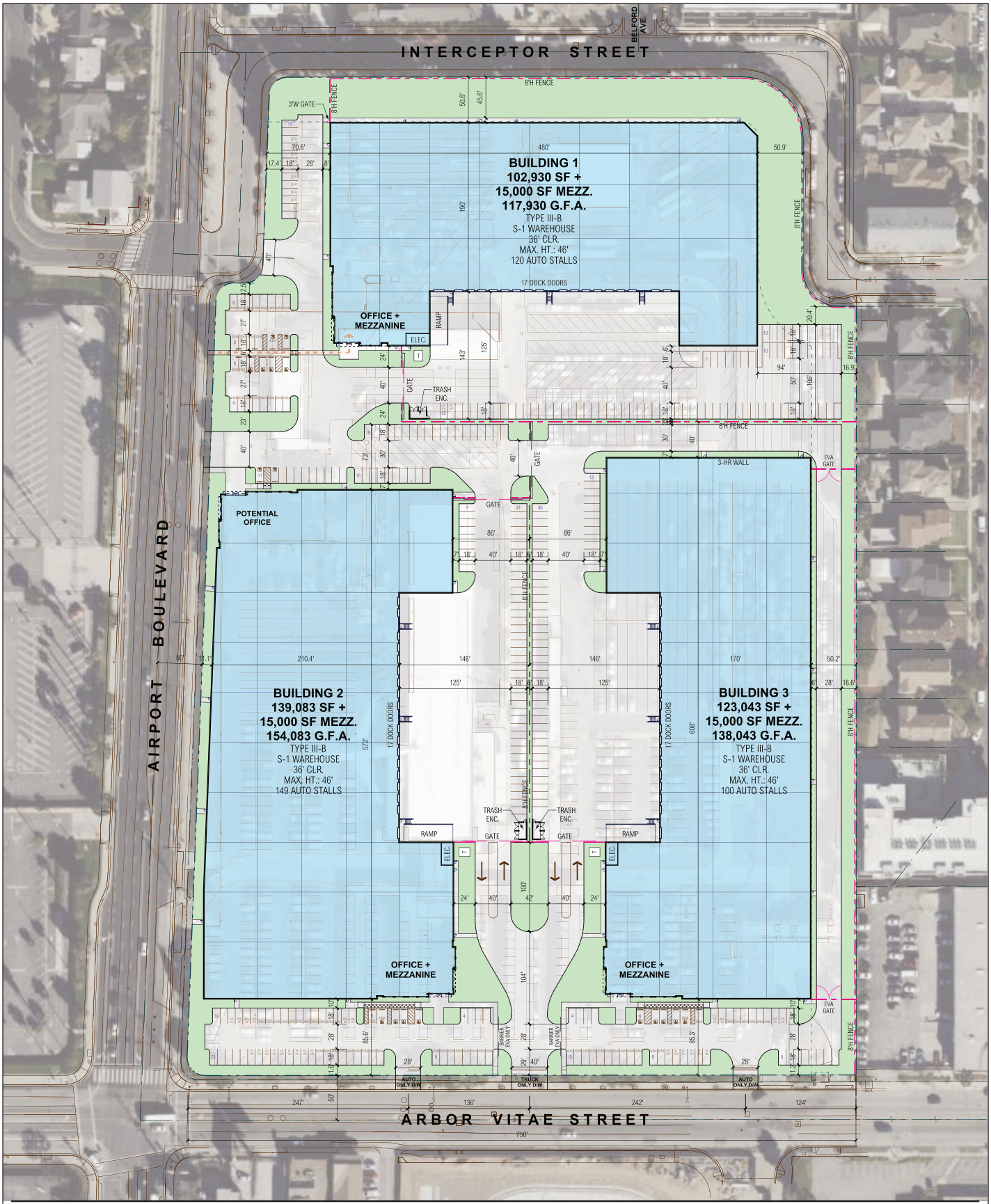


Figure 4

Conceptual Site Plan - Option 2

Source: RGA Office of Architectural Design, 2024.

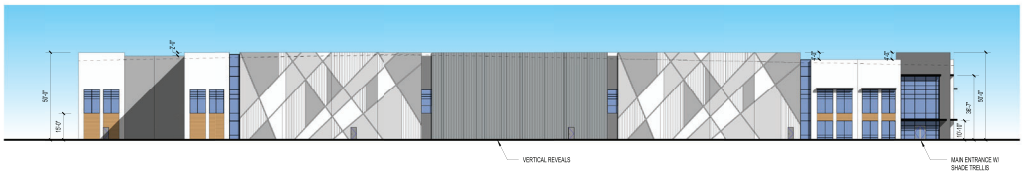
Table 1
Summary of Existing and Proposed Floor Area

Land Use	Option 1 Floor Area	Option 2 Floor Area
Existing (All to Be Removed)		
Rental Car Facility Structures	37,860 sf	37,860 sf
Total Existing Floor Area to Be Removed	*37,860 sf*	*37,860 sf*
New Construction		
Industrial	355,390 sf	320,056 sf
Office	80,000 sf	90,000 sf
Total New Construction	435,390 sf	410,056 sf
Total Floor Area Upon Completion	**435,390 sf**	**410,056 sf**

sf = square feet

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

Source: Eyestone Environmental, 2024.

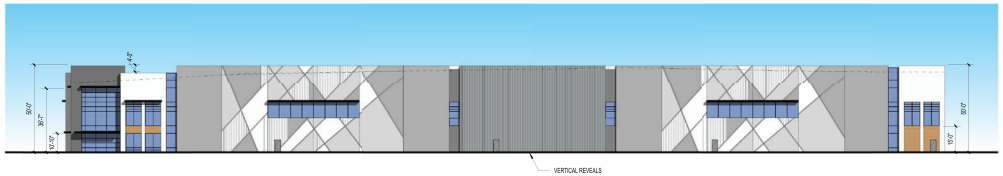


1 NORTH ELEVATION
1" = 30'-0"

1"=30'
0 15' 30' 60' 150'

2 EAST ELEVATION
1" = 30'-0"

1"=30'
0 15' 30' 60' 150'



3 SOUTH ELEVATION
1" = 30'-0"

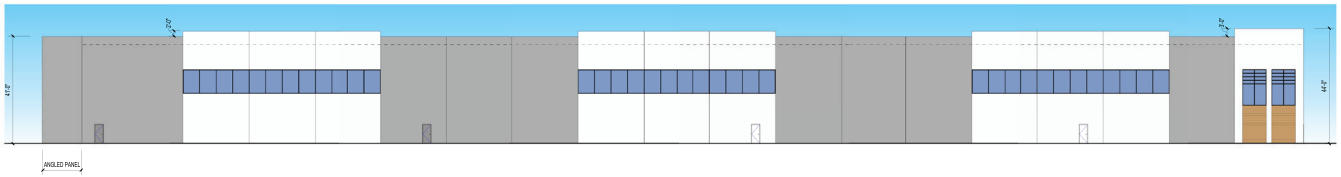
1"=30'
0 15' 30' 60' 150'

4 WEST ELEVATION
1" = 30'-0"

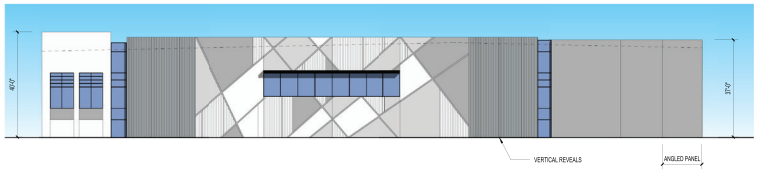
1"=30'
0 15' 30' 60' 150'

Figure 5
Conceptual Elevation – Option 1

Source: RGA Office of Architectural Design, 2024.

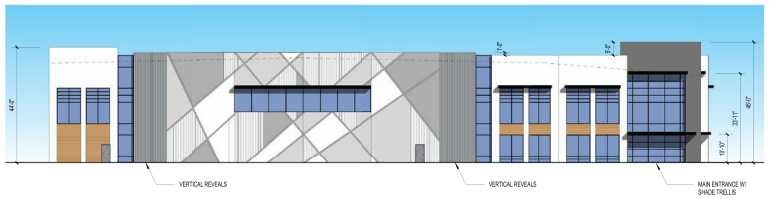


1 NORTH ELEVATION
1" = 20'-0"



2 EAST ELEVATION
1" = 20'-0"

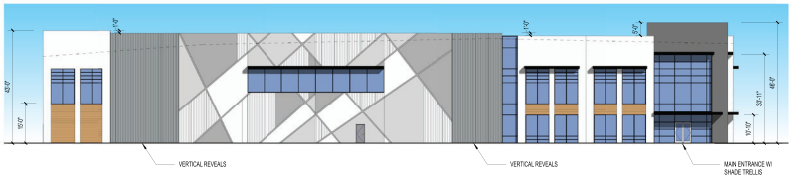
3 SOUTH ELEVATION
1" = 20'-0"



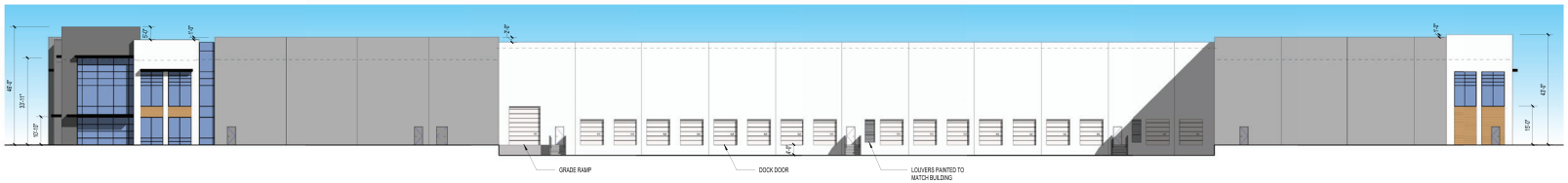
4 WEST ELEVATION
1" = 20'-0"

Figure 6
Conceptual Elevation – Option 2, Building 1

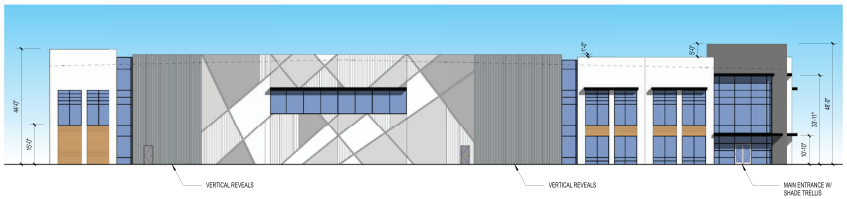
Source: RGA Office of Architectural Design, 2024.



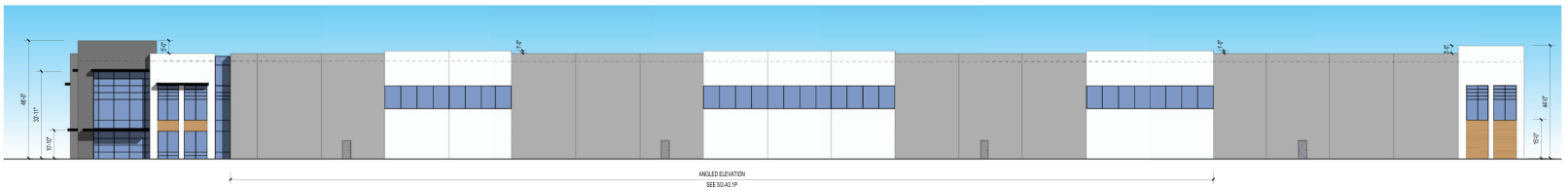
1 NORTH ELEVATION
1" = 20'-0"



2 EAST ELEVATION
1" = 20'-0"



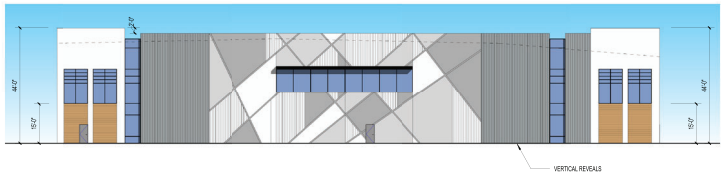
3 SOUTH ELEVATION
1" = 20'-0"



4 WEST ELEVATION
1" = 20'-0"

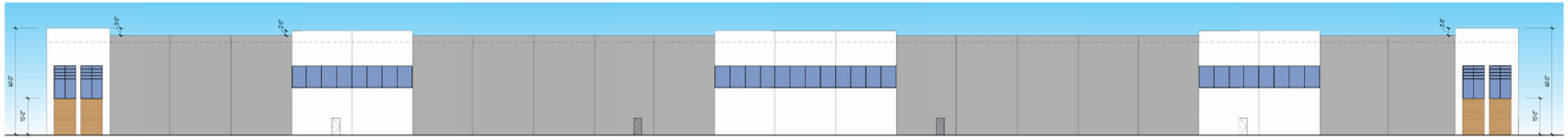
Figure 7
Conceptual Elevation – Option 2, Building 2

Source: RGA Office of Architectural Design, 2024.



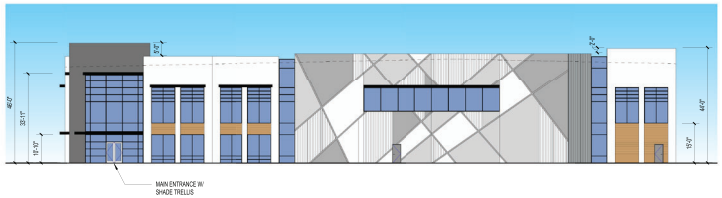
1 NORTH ELEVATION
1" = 20'-0"

1"=20'
0 10' 20' 40' 100'



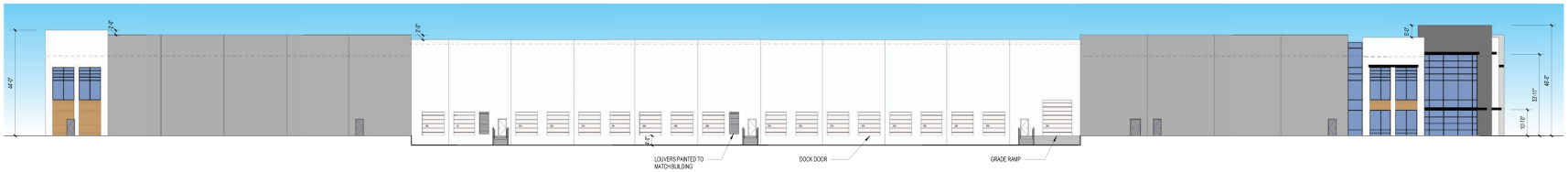
2 EAST ELEVATION
1" = 20'-0"

1"=20'
0 10' 20' 40' 100'



3 SOUTH ELEVATION
1" = 20'-0"

1"=20'
0 10' 20' 40' 100'



4 WEST ELEVATION
1" = 20'-0"

1"=20'
0 10' 20' 40' 100'

Figure 8
Conceptual Elevation – Option 2, Building 3

Source: RGA Office of Architectural Design, 2024.

3.3.2 Design and Architecture

Both Project options would include design features such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. Additionally, both Project options would provide extensive landscaping along the street frontages which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. As shown in Figure 9 and Figure 10 on pages 21 and page 22 respectively, the Project would feature neutral colors, tinted glazing, and accent materials, and through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. Further, the Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site, and use the proposed building(s) and trees as buffers to the nearby residential uses.

As described above, the Project Site is subject to "Q" Conditions, which generally include provisions with regard to setbacks, noise conditions, light pollution reduction, and landscaping requirements. In compliance with the "Q" Conditions for the Project Site, the Project would minimize windows on portions of the Project Site that face residential uses and provide landscaping and building setbacks as shown in Table 2 on page 23.

3.3.3 Open Space and Landscaping

As an industrial development, the Project is not required to provide open space in accordance with the LAMC Section 12.21 G. Notwithstanding, the Project's landscaping plans have been designed to enhance the public realm and create more effective transitions between off-site and on-site uses. As shown in Figure 11 and Figure 12 on page 24 and page 25, respectively, landscaping elements would be used to unify the various buildings on the Project Site through a diverse plant palette to be used along the street frontages and throughout the Project Site. Plantings would include resilient, drought-tolerant, California native, and adaptive tree, shrub, and groundcover species, including shade trees.

For Option 1, a total of 94,400 square feet of landscaped areas are proposed. For Option 2, a total of 120,400 square feet of landscaped areas are proposed. Under both options, the Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing with planting along the perimeter of the site. The Project would include new landscaping and maintenance of existing landscaping along Interceptor Street, Arbor Vitae Street, and Airport Boulevard as well as in the interior of the Project Site. These perimeter area and Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage.

Under Option 1 the Project would remove 56 existing on-site trees and two street trees, and under Option 2, the Project would remove 57 existing on-site trees and five street trees. None of the trees that are proposed to be removed in either Project option are protected under the City's Protected Tree and Shrubs Ordinance No. 186,873. The Project would replace the removed on-site trees with approximately 90 new trees under Option 1 and 93 new trees under Option 2, including drought tolerant, disease resistant, and non-invasive California native species including, but not limited to Jacaranda, Crepe Myrtle, Fruitless Olive, and Canary Island Pine trees. The Project would also include

Figure 9
Conceptual Rendering—Option 1

Source: Rexford Industrial Realty, Inc 2024

Figure 10
Conceptual Rendering—Option 2

Source: Rexford Industrial Realty, Inc 2024

Table 2
Proposed Project Setbacks

Required Minimum Setback	Option 1 Setbacks	Option 2 Setbacks
Landscaped Setbacks[a]		
Interceptor Drive (north)—15 feet	15.5 feet	50.6 feet
Arbor Vitae Street (south)—10 feet	10.3 feet	11.2-11.6 feet
East Side of Project Site Adjacent to R3-1 Zone (east)—5 feet	16.2 feet	16.4 feet
Interceptor (east)—7 feet	45.5 feet	50.9 feet
Airport Boulevard (west)—10 feet	14.5 feet	11.1 feet
Interceptor Drive (west)—15 feet	42.5 feet	17.4 feet
Building Setbacks[b]		
East Side—50 feet	50.2 feet	50.2 feet
North Side—50 feet	84.8 feet	50.6 feet

sf = square feet

[a] *Landscaped setbacks are required pursuant to "Q" conditions No. 3 and No. 4 included in Section 2 of Ordinance No. 151,439.*

[b] *Building setbacks facing residential uses on the north and east of the Project Site are required pursuant to "Q" condition No. 15 included in Section 2 of Ordinance No. 151,439. As described therein, no building or structure to be built on the Project Site shall be located within 50 feet of the northerly or easterly property line adjacent to or across the street from an R3-1 zoned lot.*

Source: Eyestone Environmental, 2024.

Figure 11
Conceptual Landscape Plan—Option 1

Source: Conceptual Design and Planning Company, 2024.

Figure 12

Conceptual Landscape Plan—Option 2

Source: Conceptual Design and Planning Company, 2024.

non-invasive ground cover through various species of agaves and aloes. In addition, in accordance with City requirements, the Project would replace the removed street trees at a 2-to-1 ratio with four new street trees under Option 1, and ten new street trees under Option 2, including *Jacaranda mimosifolia*, *Lagerstroemia indica*, and *Magnolia grandiflora*.

3.3.4 Access, Circulation, and Parking

On September 22, 2022, Assembly Bill (AB) 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within 0.5 miles of a Major Transit Stop.[11] A development project, for purposes of this bill, includes any project requiring a discretionary entitlement or building permit to allow the construction, reconstruction, alteration, addition, or change of use of a structure or land. Per AB 2097, the Project is not required to provide parking as it is a discretionary development project that is within 0.5 miles of the future expansion of the Metro K-Line LAX/Metro Transit Center station, a Major Transit Stop, and, thus, the Project is eligible for and will be utilizing AB 2097, and is therefore not subject to any minimum parking requirements. However, the Project would include surface parking, with 288 vehicle spaces and 90 trailer parking spaces under Option 1, and 369 vehicle parking spaces, inclusive of 20 tandem spaces, under Option 2.

As shown in Figure 13 on page 27, for Option 1, vehicular access to the Project Site would be provided along the southern boundary on Arbor Vitae Street and along the western boundary on Airport Boulevard and Interceptor Street. Two emergency vehicle access (EVA) driveways would be located on the eastern portion of the Project Site on Arbor Vitae Street and on Interceptor Street. In addition to the surface parking areas, Option 1 would include 42 loading dock doors oriented toward Airport Boulevard to the west. In addition, 44 short-term and 52 long-term for a total of 96 bicycle parking spaces would be provided. Access for trash pickup would be provided via the driveway on Airport Boulevard on the southwestern portion of the Project Site.

As shown in Figure 14 on page 28 for Option 2, vehicular access to the Project Site would be provided via three driveways along Arbor Vitae Street, and two driveways along Airport Boulevard and Interceptor Street. An EVA access driveway would be located on the eastern portion of the Project Site along Arbor Vitae Street. In addition to the surface parking, Option 2 would include 17 loading dock doors at each building oriented toward the center of the Project Site. Further, 41 short-term and 50 long-term for a total of 91 bicycle parking spaces would be provided. Access for trash pickup would be provided via the driveway on Airport Boulevard for Building 1 and via the driveway on Arbor Vitae Street for Building 2 and Building 3.

For both options, pursuant to Ordinance No. 187,719 and Ordinance No. 186,485, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) with 20 percent of the spaces equipped with EV Charging Stations.

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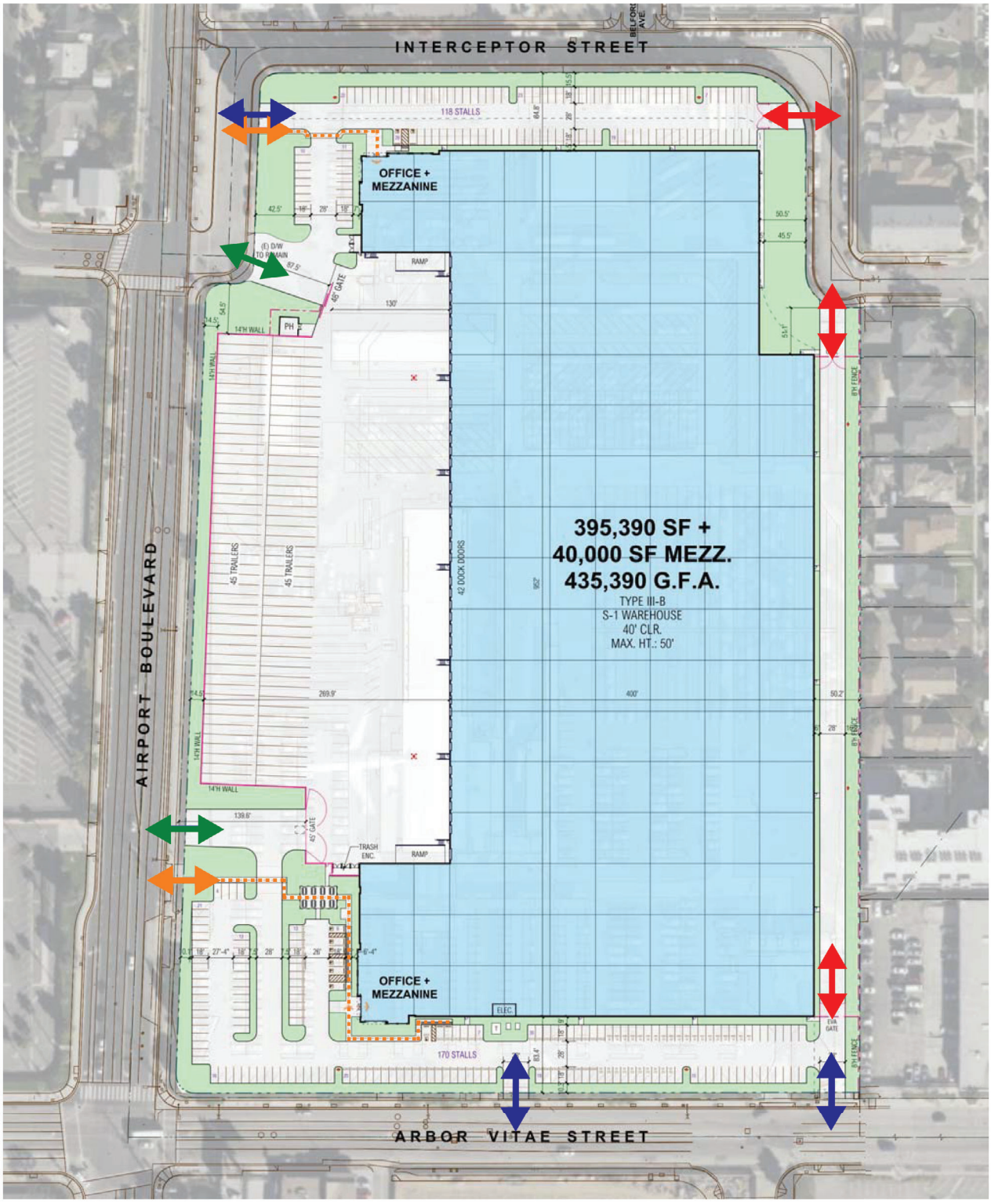
[11] PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

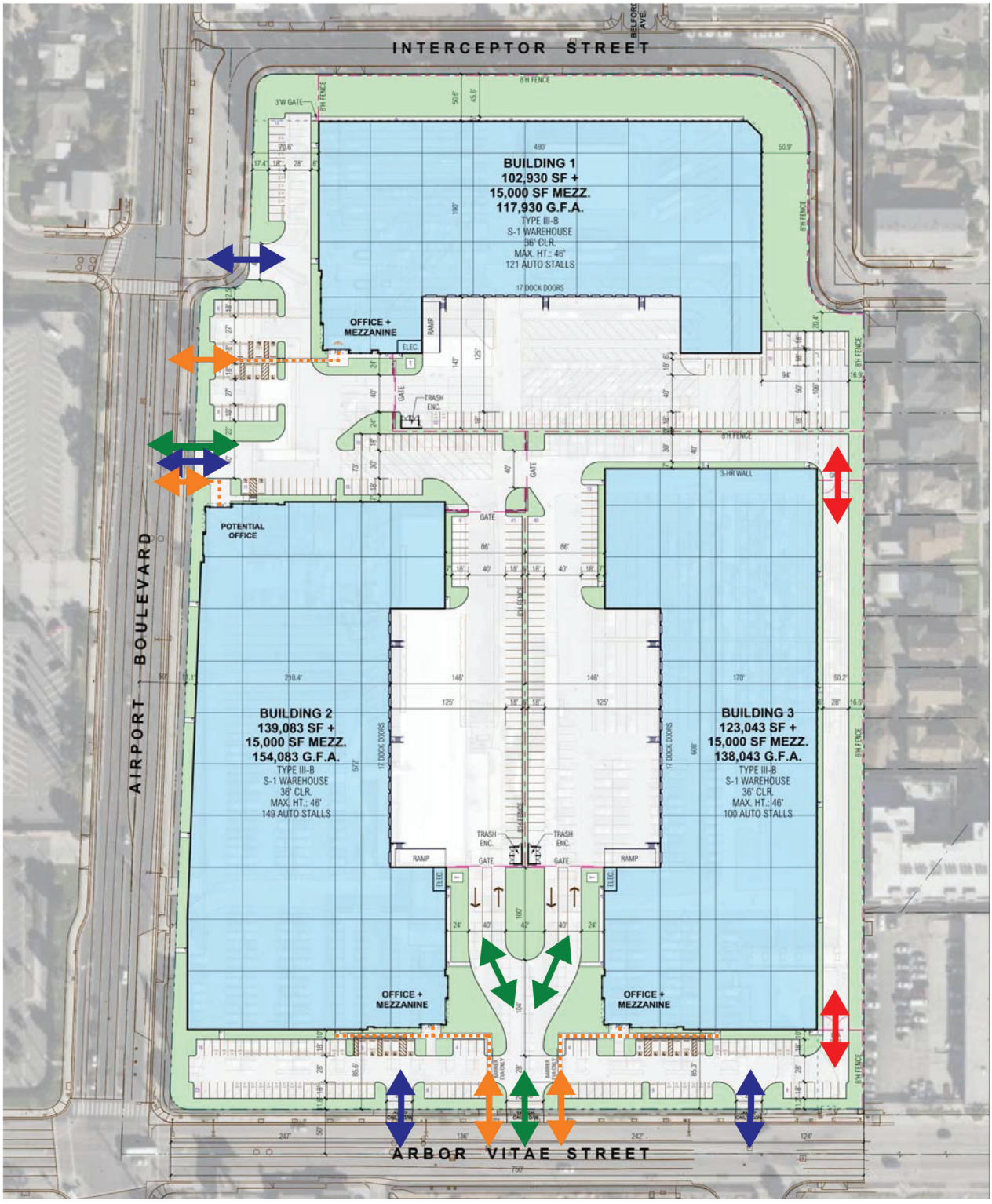


Legend

- Car Ingress/Egress
- Truck Ingress/Egress
- EVA Access Only
- Pedestrian Access
- Path of Travel

Figure 13
Access and Circulation Plan - Option 1

Source: RGA Office of Architectural Design, 2024.



Legend

- Car Ingress/Egress
- Truck Ingress/Egress
- EVA Access Only
- Pedestrian Access
- Path of Travel

Figure 14
Access and Circulation Plan - Option 2

Source: RGA Office of Architectural Design, 2024.

3.3.5 Lighting and Signage

For both options, all lighting would comply with current energy standards and code requirements while providing appropriate light levels needed to provide safety and to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

New signage would be integrated with and complement the overall aesthetic character of proposed on-site development and surroundings. Project signage could include general ground-level and wayfinding pedestrian signage around the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on-site wall signs, internal digital on-site signage, murals, and studio graphics that are typical on industrial warehouse buildings. Project signage may include both externally and internally lit signs, to which LAMC illumination regulations would apply.

3.3.6 Site Security

Project security would involve a combination of physical and operational strategies intended to achieve a secure and safe working environment. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the privacy necessary for certain operational activities and to ensure pedestrian safety. In addition, points of entry would be secured by elements such as guard booths, key card passes, pedestrian and vehicular access controls, and site-wide lighting. Operational elements such as 24-hour security personnel, employee and visitor badging, and visual surveillance would further enhance the security and safety of the Project.

Office lobbies would also include security-controlled access. Additionally, the Project would be designed such that entrances to and exits from the buildings, open spaces around the buildings, and pedestrian walkways would be open and in view of surrounding sites. Further, building exteriors and walkways would be properly lit to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features equivalent to Gold certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9) and the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy

Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). Both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, including but not limited to: Energy Star appliances; solar panels; continuous insulation and high-performance glazing to minimize heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and 30 percent of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE, with 20 percent of the spaces equipped with EV Charging Stations. Such measures would support energy conservation and will be further defined in the EIR.

3.3.8 Anticipated Construction Schedule

Project construction would begin with the demolition of the existing rental car facility structures. The next phase would include grading and excavation, which would extend to a depth of approximately 10 feet below ground surface (bgs). The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2026 and be completed in 2027. For Option 1, no export would be required to be hauled off the Project Site and 9,612 cubic yards of import would be hauled to the Project Site. For Option 2, 4,850 cubic yards of export would be hauled off the Project Site and no import would be hauled to the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The anticipated requests for approval of the Project are listed below. The Environmental Impact Report will analyze the potential impacts associated with the Project and will provide the 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:

- A **Vesting Class 2 Conditional Use Permit** for a Commercial Corner Development in an M zone, adjoining a R zoned lot, to allow:
  - Hours of operation outside the otherwise permitted hours of 7:00 A.M. to 11:00 P.M.;
  - A maximum building height of 50 feet in lieu of the otherwise permitted height of 45 feet;
  - Commercial tandem parking, as otherwise not permitted; and
  - Less than 50 percent of the exterior walls and doors of a ground floor fronting adjacent streets containing transparent windows.
- A **Vesting Class 3 Conditional Use Permit** for a Major Development Project in the M1 Zone which creates more than 250,000 square feet of warehouse floor area.

- A **Project Review** to permit the development of a project which creates or results in an increase of 50,000 square feet or more of nonresidential floor area.

- Other discretionary and ministerial permits 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.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration (State CEQA Guidelines Section 15381). No responsible agency has been identified for the Project. A Trustee Agency under CEQA is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (State CEQA Guidelines Section 15386). No trustee agencies have been identified for this Project.

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 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?	☒	☐	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The City's General Plan Conservation Element defines scenic vistas or vistas as the "panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features."[12] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees. The Project is located within an urbanized portion of the City of Los Angeles.

The Project Site is bounded by South Interceptor Street to the north, West Arbor Vitae Street to the south, residential uses and surface parking to the east, and South Airport Boulevard to the west. The

[12] City of Los Angeles Department of City Planning, General Plan Conservation Element, originally adopted September 26, 2001.

Project Site is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings used for maintenance facilities and office uses, as well as surface parking. Additionally, the Project Site contains accessory structures including a carwash, solar panel canopies, and fueling station canopies. As shown in Figure 2, on page 10, the Project Site is located in an urbanized area that includes a mix of low-rise buildings containing industrial, residential, and commercial uses. The existing buildings on the Project Site are not listed on the National Register of Historic Places, the California Register of Historical Resources, or as a County of Los Angeles Landmark or City of Los Angeles Historic-Cultural Monument. Therefore, the buildings would not be considered visual resources for purposes of this analysis. Panoramic views of visual resources are limited due to the predominantly flat terrain of the Project area and the relatively dense, intervening development that blocks such long-range, expansive views. Additionally, the Project would not block focal views of visual resources. Overall, due to the highly urbanized and built out surroundings, development of the Project would not substantially or adversely affect a scenic vista. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along Lincoln Boulevard (Route 1), approximately 4.8 miles northwest of the Project Site.[13] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. No impacts would occur, and no further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, would the project 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?

Potentially Significant Impact. The Project is located within an urbanized portion of the City of Los Angeles and would include removal of the existing on-site structures, and the construction of one or three warehouse buildings. Development of the Project would change the visual character and quality of public views of the Project Site. As such, further evaluation of the Project's potential to conflict with applicable zoning and other regulations governing scenic quality, including the LAMC and City's General Plan Framework, would be provided in an EIR.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The Project is located within an urbanized portion of the City of Los Angeles and would include removal of the existing on-site structures, and the construction of one or three warehouse buildings which may introduce new sources of light and potential glare typically associated with architectural lighting, interior lighting, and security and wayfinding lighting. Therefore, further evaluation of the Project's potential light and glare impacts will be evaluated in the EIR.

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[13] California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed July 19, 2024.

II. AGRICULTURE AND FOREST 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. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with commercial uses as well as associated surface parking. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide

Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[14,15] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned [T][Q]M1-1 (Tentative, Qualified Qualification, Limited Industrial, Height District No. 1). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.[16] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking areas. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.[17] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no further evaluation of this topic in an EIR is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

e. Would the project 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?

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14 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

15 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed July 19, 2024.

16 California Department of Conservation, The Williamson Act Status Report 2020–21, May 2022.

17 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4125-010-016 http://zimas.lacity.org/, accessed July 19, 2024.

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[18] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

	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. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in some level of non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[19]). SCAQMD's 2016 and 2022 Air Quality Management Plans (AQMPs) contain a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino,

[18] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

[19] Partial nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only. The Basin has an extreme nonattainment designation for Ozone under the NAAQS. The Basin has a serious nonattainment designation for $PM_{2.5}$ under the NAAQS.

and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment.[20] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

b. Would the project 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?

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone (extreme), $PM_{2.5}$ (serious), and lead (partial), and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$.[21] As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of off-road construction equipment and conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[22] The Project would not involve operation of these types of uses. In addition, on-site trash receptacles would be contained,

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

[21] SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, 2023.

[22] SCAQMD, CEQA Air Quality Handbook, 1993.

located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[23] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[24]

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

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 U.S. 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?	☐	☐	☐	☒

[23] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed July 19, 2024.

[24] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project 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. The Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking. The Project Site is relatively flat with limited ornamental landscaping. The Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[25,26] In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) located in or adjacent to the Project Site. Rather, the Project Site and surrounding areas contain urbanized and disturbed land. Due to the urbanized and disturbed nature of the Project Site, species likely to occur on-site or in surrounding areas are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW[27] or by the USFWS[28] would be present on-site.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 146 non-protected trees on the Project Site and 14 non-protected street trees adjacent

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25 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1D—Biological Resources Areas (Coastal and Southern Geographical Area), January 19, 1995, p. 2-18-6.

26 County of Los Angeles, Department of Regional Planning, Los Angeles County General Plan Update, Final Environmental Impact Report, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

27 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, November 2023.

28 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, November 15, 2023.

to the Project Site. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." While the Project would require the removal of 58 existing trees (including 56 on-site trees and two street trees) under Option 1, and 62 existing trees (including 57 on-site trees and five street trees) under Option 2, which could potentially provide nesting sites for migratory birds, compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with California Fish and Game Code Section 3503, with the implementation of BIO-PDF-1 tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found during removal activities, a buffer would be established until the fledglings have left the nest. The size of the required buffer area would vary with the species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW.

Therefore, with implementation of BIO-PDF-1 which includes compliance with California Fish and Game Code Section 3503, Migratory Bird Treaty Act (MBTA), and standard construction processes, including best management practices during nesting season, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Project Design Feature BIO-PDF-1: The Project Applicant shall include on the Project plans an acknowledgement of the requirements to comply with the Migratory Bird Treaty Act and California Fish and Game Code Section 3503 and best management practices recommended by a Qualified Biologist to avoid impacts to active nests, including checking for nests prior to construction activities during nesting season (February 1 to August 31) and what to do if an active nest is found, including inadvertently during grading or construction activities. To the extent feasible tree removal would occur outside of nest season. Such best management practices shall include giving an adequate construction and grading buffer to avoid the active nest during construction, such as the following:

- **Pre-Construction Survey:** For any Project requiring tree or vegetation removal during the bird nesting season (February 1 to August 31), a pre-construction nesting bird survey of all suitable habitat shall be conducted no more than 10 days prior to the initiation of demolition or tree or vegetation removal to determine if nesting birds are present. The pre-construction nesting bird survey shall be conducted on foot within the Project Site boundaries by a Qualified Biologist.
- **Buffer for Active Nests:** If any active bird nest is found during a pre-construction nesting bird survey or is discovered inadvertently during construction related activities, a Qualified Biologist shall recommend an avoidance buffer which shall be no less than is necessary to protect the nest, eggs and/or fledglings, from damage or disturbance in consideration of the following factors: the bird species, the availability of suitable habitat within the immediate area, the proposed work activity, and existing disturbances

associated with surrounding land uses. The buffer shall be demarcated using bright orange construction fencing, flagging, or other means to mark the boundary of the buffer. All construction personnel shall be notified of the buffer zone and shall avoid entering the protected area. No ground disturbing activities or vegetation removal shall occur within this buffer area until the Qualified Biologist has confirmed that breeding/nesting is complete and the young have fledged the nest and/or that the nest is no longer an active nest.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[29,30] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[31,32] There are no other sensitive natural communities identified by the CDFW or the USFWS on the Project Site or its surrounding area.[33,34] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no further evaluation of this topic in an EIR is required.

c. Would the project 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. As discussed in Checklist Question IV.a, the Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking areas. In addition, the surrounding area has been fully developed. No water bodies or state or federally protected wetlands exist on the Project Site.[35] As such, the Project would not have an adverse effect on state or federally protected wetlands No impact would occur, and no further evaluation of this topic in an EIR is required.

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29 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

30 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed July 19, 2024.

31 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1D—Biological Resources Areas (Coastal and Southern Geographical Area), January 19, 1995, p. 2-18-6.

32 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

33 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios6/, accessed July 19, 2024.

34 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed July 19, 2024.

35 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed July 19, 2024.

d. Would the project 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. As described in Checklist Question IV.a, the Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open space areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[36,37]

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, and as previously described, while the Project would require the removal of 58 existing trees (including 56 on-site trees and two street trees) under Option 1, and 62 existing trees (including 57 on-site trees and five street trees) under Option 2. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the MBTA [38], which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and consistent with Project Design Feature BIO-PDF-1, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with the California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, the Project would replace the removed street trees at a 2 to 1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500, with four new street trees under Option 1 and ten new street trees under Option 2, including *Jacaranda mimosifolia*, *Lagerstroemia indica*, and *Magnolia grandiflora*.

Overall, in compliance with the MBTA and California Fish and Game Code Section 3503 which are ensured through Project Design Feature BIO-PDF-1, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division's requirements, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory

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36 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1D—Biological Resources Areas (Coastal and Southern Geographical Area), January 19, 1995, p. 2-18-6.

37 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

38 United States Fish and Wildlife Service, Migratory Bird Treaty Act of 1918.

wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), Southern California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in cumulative diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon the root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 146 existing trees located within the Project Site. Surrounding the Project are 14 right-of-way trees, located along the perimeter of the Project Site. As part of the Project, a total of two existing street trees would be removed under Option 1 and five existing street trees would be removed under Option 2.[39] However, in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500, the Project would replace the removed street trees at a 2:1 ratio. On-site trees would be replaced at a 1:1 ratio. None of the on-site trees or street trees are considered protected by the City of Los Angeles' Tree Preservation Ordinance No. 186,873. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources including the City of Los Angeles' Tree Preservation Ordinance No. 186,873. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

f. Would the project 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. As described in section IV.a, the Project Site is located in an urbanized area and is currently developed with commercial uses as well as associated surface parking. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[40] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural

[39] The proposed street tree removal is subject to approval by the Bureau of Street Services, Urban Forestry Division.

[40] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

The following analysis regarding archaeological resources is based on the Archaeological Resources Assessment prepared by SWCA Environmental Consultants, dated December 2023, included as Appendix IS-2 of this Initial Study.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously discussed, the Project Site is currently developed with commercial uses as well as associated surface parking, and there are no historical buildings in or adjacent to the Project Site .The Project Site is not identified as individually listed in or formally determined to be eligible for listing in the National Register, the California Register, or identified in SurveyLA. Further, the Project Site does not

contain any extant buildings, structures, objects, sites, or districts with any historical associations or significance necessary for California Register eligibility. Therefore, the Project would not create any new significant impacts related to historical resources nor result in a substantial increase in a previously identified significant impact. No further analysis of this topic in an EIR is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Based on a records search conducted by the South Central Coastal Information Center (SCCIC) for the Project Site, as referenced in the in Appendix IS-2 of this Initial Study, no archeological resources were identified within the Project Site. Specifically, results of the California Historical Resources Information System (CHRIS) records search from the SCCIC conducted on August 8, 2023, indicate that 18 cultural resource studies have been conducted within 0.5 miles of the Project Site; one of these studies intersect the Project Site. Further, on September 1, 2023, the Native American Heritage Commission (NAHC) submitted the results of a Sacred Lands File (SLF) search. The results of the SLF search were negative. In their response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of resources within the Project Site and that the CHRIS and SLF are not exhaustive. However, as discussed in the Archaeological Resources Assessment, given the intensive modifications to the surface and subsurface within the Project Site, SWCA concluded that the Project Site has a low sensitivity for containing archaeological resources affiliated with Native Americans. Further discussion of impacts to tribal cultural resources is included under Section XVII, Tribal Cultural Resources.

SWCA's research focused on assessing historic period land uses through a review of available archival sources that included various types of written records, photographs, and maps. As discussed therein, the CHRIS records search identified one cultural resource (LAN-214) within a 0.5-mile radius of the Project site that does not intersect the Project site. The site record for LAN-214 states that the site was initially recorded in 1953 as having contained one or more Native American artifacts located 0.4 miles to 0.6 miles northwest of the Project Site. Further, SWCA's background research determined that the Project site appears to have been used for agricultural purposes and remained vacant until 1956, at which point it was developed with the Airport Junior High School campus. By 1980, construction had started on the extant car rental facility within the Project Site. SWCA finds the Project has a moderate potential for buried buildings materials, structural foundations, or individual pieces of refuse associated with the use as the Airport Junior High School from the mid-1950s to early 1970s. These types of historical archaeological resources would be unlikely to have any association with historically significant events or persons, and they would be unlikely to convey any distinctive characteristics in type, period, region, or method, and are not the focus of masterful design or artistry; therefore, Criteria 1, 2, and 3 of the CRHR are unlikely to be satisfied by these types of historical archaeological resources. Given the disturbances to the setting resulting from the demolition of the former Airport Junior High School campus, and when considering the existing historical information for this location and time period, these types of historical archaeological resources are also not likely to satisfy Criterion 4 of the CRHR or retain sufficient integrity. Lastly, there is no substantial evidence indicating that individual pieces of

refuse, fragmentary building materials, or remnants of building foundations would meet the criteria for designate as a unique archaeological resource. Therefore, although there is a moderate potential to encounter certain types of historical archaeological resources, these are not likely to be historical resources under CEQA, as described in Checklist Question V.a above.

If an archaeological resource were to be discovered during construction of the Project, work in the area would cease, and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Nevertheless, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts to archaeological resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project Site is located in an urbanized area and has been subject to previous grading and development. In addition, as discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation, which would extend to a depth of approximately 10 feet. Nevertheless, if human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons they believe to be the most likely descendant(s) from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the statutory and regulatory requirements described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

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

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. The Project would generate an increased demand for energy resources compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources due to compliance with existing regulations, further evaluation of the Project's demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030.[41] The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[42] The 2022 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water

[41] CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed July 19, 2024.

[42] CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed July 19, 2024.

heating, and lighting and efficiency improvements to the non-residential standards, which include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[43]

As previously described, the Project Site is currently developed with commercial uses as well as associated surface parking. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, further evaluation of the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be provided in the EIR.

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 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.	☐	☐	☒	☐
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?	☐	☐	☒	☐

[43] CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐

The following analysis regarding geology and soils is based on the Geotechnical Exploration Report Proposed Industrial Buildings prepared by Leighton, dated February 2024 and the Supplemental Percolation Study prepared by Leighton, dated September 2023, included as Appendix IS-3.1 and Appendix IS-3.2 of this Initial Study, respectively (Geotechnical Reports). All specific information on geology and soils conditions on the Project Site in the discussion below is based on the previously prepared reports referenced above unless otherwise noted.

a. Would the project 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. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,700 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[44] As discussed in the Geotechnical Reports, the closest known active fault zone is associated with the Newport-Inglewood Fault, mapped approximately 1.8 miles north of the Project Site.Therefore, no active faults are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to fault rupture. Impacts associated with surface rupture from a known earthquake fault would be less than significant, and no further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The closest known active fault to the Project Site is the Newport-Inglewood Fault, mapped approximately 1.8 miles north of the Project Site.[45] While the Project Site is subject to moderate to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by seismic engineering design and construction in conformance with current building codes and engineering practices. State and local code requirements ensure that buildings are designed and constructed in a manner that would reduce the substantial risk of collapse, although the buildings may sustain damage during a major earthquake. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Reports.

Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments to minimize seismic impacts. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in the Geotechnical Reports for the Project which would be subject to review and approval by the LADBS. The recommendations in the

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[44] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

[45] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

Project's Geotechnical Reports would be enforced by the LADBS for the construction of the Project. Through compliance with regulatory requirements and thesite-specific geotechnical recommendations contained in the Geotechnical Reports, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to strong seismic ground shaking would be less than significant, and no further evaluation of this topic is an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is not located within an area identified by the City of Los Angeles or California Geological Survey as having a potential for liquefaction.[46,47] In addition, according to the Geotechnical Reports, the historical high groundwater level at the Project Site is mapped at a depth of approximately 40 feet and the native soils that exist on the Project Site consist of Quaternary-aged (late to middle Pleistocene) older alluvial deposits. These materials are generally not considered susceptible to liquefaction. Further, as discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation, which would extend to a depth of approximately 10 feet. Therefore, the Project would not exacerbate existing conditions related to bringing development and people into an area affected by liquefaction, and with adherence to existing regulations and site-specific design recommendations contained in the Geotechnical Reports, impacts related to liquefaction would be less than significant. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles.[48,49,50] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no further evaluation of this topic in an EIR is required.

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46 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

47 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed Jul 19, 2024.

48 Ibid.

49 City of Los Angeles, 2018 Local Hazard Mitigation Plan, West LA APC, Figure 11-12, Landslide Susceptibility Zones, p. 11-13.

50 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed Jul 19, 2024.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. It is estimated that no export would be required to be hauled off the Project Site for Option 1 and 4,850 cubic yards of export would be hauled off the Project Site for Option 2. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to erosion and runoff. However, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs to be used during construction to manage and control stormwater and non-stormwater discharges, including, but not limited to, erosion control and sediment control with sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize erosion and the discharge of pollutants in stormwater runoff during construction. Additionally, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. On-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance[51] and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no further evaluation of this topic in an EIR is required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impact related to landslides would occur.

Liquefaction-related effects include lateral spreading. Since the Project Site is not located in an identified liquefiable area, the potential for lateral spreading would also be considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Impacts related to lateral spreading would be less than significant, and no further evaluation of this topic in an EIR is required.

[51] City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. As discussed in the Geotechnical Reports, the mapped historic high groundwater level beneath the Project Site is approximately 40 feet bgs. As discussed in Section 3, Project Description, of this Initial Study, construction activities for the Project would require excavation to a maximum depth of approximately 10 feet. Therefore, dewatering operations are not expected during construction. Moreover, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned to occur on the Project Site. Therefore, there is little to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in subsidence. Impacts related to subsidence would be less than significant, and no further evaluation of this topic in an EIR is required.

As discussed above, the Project Site is not located within an area susceptible to liquefaction. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in liquefaction. Impacts associated with liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading.[52] According to the Geotechnical Reports, soils underlying the Project Site include soils that are medium dense to very dense silty sands and clayey sands with few interlayers of yellow-brown to orange-brown, moist, stiff to hard sandy clay and clay. Therefore, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. As such, the Project would not be located on and or exacerbate a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the project 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. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Report, the on-site geological materials are in the very low expansive potential range. However, if moderately expansive soils are encountered, such soils would be addressed using standard geotechnical design practices (i.e., removal and replacement with non-expansive engineered fill). Furthermore, construction of the Project would be required to comply with the current California Building Code (CBC) and supplemental requirements of the LAMC, as enforced by the City through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in a design-level geotechnical evaluation for the Project as required by the City. In addition, with implementation of the recommendations set forth in the design-level geotechnical evaluation for the Project, as required by the City, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Thus, through compliance with regulatory requirements, potential

[52] ScienceDirect, Expansive Soils, www.sciencedirect.com/topics/engineering/expansive-soil, accessed Jul 19, 2024.

impacts associated with expansive soils would be less than significant. No further evaluation of this topic in an EIR is required.

e. Would the project 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. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no further evaluation of this topic in an EIR is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. No unique geologic features are located on-site. 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. Although the Project Site has been previously graded and developed, the Project could require grading and excavation of the Project Site to maximum excavation depths of up to approximately 10 feet below existing grade, which could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project's potential impacts to paleontological resources will be provided in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of

greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, further evaluation of the Project's GHG emissions will be provided in the EIR.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The Project would have the potential to emit GHGs. Therefore, further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be included in an EIR.

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?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potential Significant Impact. The types and amount of hazardous materials potentially used in connection with the construction and operation Project are anticipated to be typical of those used for industrial warehouse uses. Nonetheless, further analysis of this issue will be provided in the EIR.

b. Would the project 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with commercial uses as well as associated surface parking . Given the age of the existing structures and the previous uses, asbestos containing materials (ACM), lead-based paints (LBP), and/or other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Would the project 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. There are no LAUSD schools within a one-quarter mile radius of the Project Site nor are any schools proposed to be built within this radius. The nearest schools located in the vicinity of the Project Site include Carousel School (0.9 miles north of the Project Site); Westport Heights Elementary School (1.1 miles north of the Project Site); Oak Street Elementary School (1.5 miles east of the Project Site); and Open Magnet Charter School (1.5 miles north of the Project Site). If a school were to be built within the radius in the future, as discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of industrial developments and would include fuels, paints, solvents, and concrete additives. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning products, paints, and those used for landscaping maintenance. Furthermore, all materials used during both the construction and operation of the 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 OSHA requirements, and would not create a significant hazard to existing or future

nearby schools. As such, the Project's potential impacts associated with hazards emissions within 0.25 miles of an existing school would be less than significant, and no further evaluation of this topic in the EIR is required.

d. Would the project 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?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. The Project Site may appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

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?

Potentially Significant Impact. The Project Site is located within two miles of the Los Angeles International Airport, which is located adjacent to the western boundary of the Project Site. Given the distance between the Project Site and the nearest airport, the Project could expose people residing or working in the Project area to excessive noise levels. Therefore, impacts would potentially be significant, and further evaluation of this topic will be included in the EIR.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuation Annex "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." [53] However, in response to a more localized emergency, such as a hillside wildfire, the Los Angeles Fire Department (LAFD) works in coordination with the Los Angeles Department of Transportation (LADOT) and Los Angeles Police Department (LAPD) to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are

[53] City of Los Angeles Emergency Operations Plan, Evacuation Functional Support Annex, October 2020.

identified.[54] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off site construction activities would occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan. The Project's potential impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[55,56] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed office and industrial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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54 Los Angeles Safety Element, November 2021, p. 23.

55 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016 http://zimas.lacity.org/, accessed July 19, 2024.

56 City of Los Angeles, 2018 Local Hazard Mitigation Plan, West Los Angeles APC, Figure 13-8, Wildlife Severity Zones, p. 282.

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?	☐	☐	☒	☐

The following analysis is based on the Drainage Report prepared for the Project by Cannon, Corp., dated May 2024. All specific information on hydrology and water quality in the discussion below is from this report unless otherwise noted. The Drainage Report is included as Appendix IS-4 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

As discussed in the Drainage Report, construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering, can contribute to pollutant loading in stormwater runoff. Additionally, on-site watering activities to reduce airborne dust could contribute to pollutant loading in stormwater runoff. However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As discussed in the Drainage Report, the Project Site runoff leads into the Dominguez Channel Watershed. Constituents of concern listed for Dominguez Channel above Vermont Avenue under California's Clean Water Act Section 303(d) List includes indicator bacteria, zinc, copper toxicity, and lead. Listed pollutants with Total Maximum Daily Loads (TMDL) in Dominguez Channel above Vermont Avenue include zinc, copper toxicity, and lead. Constituents of concern listed for Dominguez Channel below Vermont Avenue under California's Clean Water Act Section 303(d) List includes polychlorinated biphenyls, benzo(a)pyrene, pyrene, phenanthrene, chrysene, benzo(a)anthracene, dieldrin (tissue), indicator bacteria, lead, benthic community effects, toxicity, chlordane (tissue), copper, and DDT (tissue and sediment). Listed pollutants with TMDL in Dominguez Channel below Vermont Avenue include polychlorinated biphenyls, benzo(a)pyrene, pyrene, phenanthrene, chrysene, benzo(a)anthracene, dieldrin (tissue), lead, benthic community effects, toxicity, chlordane (tissue) copper, and DDT (tissue and sediment).

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under Section 3.1.3 of the LID manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat

stormwater runoff in compliance with LID. As stated in the Drainage Report, it appears that the Project Site currently discharges without any means of treatment. As such, implementation of LID BMPs as part of the Project would improve existing site conditions. As such, with the implementation of LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed in the Drainage Report, groundwater was not encountered when testing was extended to a depth of 50 feet and the historical high groundwater was reported at a depth of 40 feet. As discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation, which would extend to a depth of approximately 10 feet. Based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering may not be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations.

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 that could percolate into groundwater. In addition, construction activities would not be expected to affect existing wells due to distance and limited excavation activities at the Project Site. Thus, construction of the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. Impacts to groundwater quality during operation of the Project would be less than significant, and no further evaluation of this topic is required in the EIR.

Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are currently operated or will be operated by the Project. Compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and depth of groundwater below the Project Site. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, Project operations would not result in violations of any water quality standards or waste

discharge requirements or otherwise substantially degrade groundwater quality. The Project's potential impact on groundwater quality operation would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project 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. As provided by the following analysis, 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.

Construction

No active water supply wells are located at the Project Site or within a one-mile radius of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells.[57] As described in Section 3, Project Description, of this Initial Study, the Project would involve limited excavations approximately 10 feet below ground surface. As previously described, groundwater was not encountered when testing was extended to a depth of 50 feet and the historical high groundwater was reported at a depth of 40 feet. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If dewatering is required, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrologic conditions, including groundwater production wells or public active water supply wells within a one-mile radius of the Project Site[58], would not be affected by any unanticipated Project dewatering operations, and regional impacts to groundwater supplies and management of the basin would not be considered significant. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As discussed in the Drainage Report, the Project Site is approximately 90 percent impervious. Project implementation would decrease the percentage of impervious area from 90 percent impervious to 88 percent under Option 1 and 85 percent under Option 2. With incorporation of BMPs to control and treat stormwater runoff, implementation of the Project could potentially increase groundwater recharge. The Project would not include the installation of water supply wells and there are no existing wells located at or within a one-mile radius of the Project Site.[59] Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may

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[57] Drainage Report, Cannon, Corp., dated May 2024 Los Angeles County Groundwater Well Mapping Application Well 1314 (State ID 2S14W31H01) is approximately 500 ft away, but is inactive.

[58] Drainage Report, Cannon, Corp., dated May 2024 Los Angeles County Groundwater Well Mapping Application Well 1314 (State ID 2S14W31H01) is approximately 500 ft away, but is inactive.

[59] Drainage Report, Cannon, Corp., dated May 2024 Los Angeles County Groundwater Well Mapping Application Well 1314 (State ID 2S14W31H01) is approximately 500 ft away, but is inactive.

impede sustainable groundwater management of the basin. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

c. Would the project 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.

Construction

Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to erosion. However, as discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

As previously discussed, with implementation of the Project, the percentage of impervious area from the current condition of the Project Site would be reduced. The Project would develop one or three industrial warehouse buildings, surface parking, and landscape amenity spaces, which would create a post-Project condition of approximately 88 percent (Option 1) or 85 percent (Option 2) impervious surface area. As stated in the Drainage Report, included as Appendix IS-4 of this Initial Study, surface water runoff from the Project would be directed to the existing storm drain main that runs along Arbor Vitae Street. Furthermore, in accordance with requirements of the City's LID Ordinance, BMPs would be implemented throughout the operational life of the Project to reduce erosion. Therefore, operation of the Project would not substantially alter the Project Site's drainage patterns in a matter that would result in substantial erosion or siltation on- or off- site. Operational impacts related to erosion and siltation would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less than Significant Impact.

Construction

As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing commercial uses as well as associated surface parking, followed by grading and excavation. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, with implementation of the Project, the percentage of pervious area from the current condition of the Project Site would be decreased. As detailed in the Drainage Report, a comparison of pre- and post-Project peak flow rates indicate a decrease in stormwater runoff from the Project Site. In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. Therefore, with implementation of BMPs, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As detailed in the Drainage Report, a comparison of the pre- and post-Project peak flow rates indicates that the Project would not increase peak flows from 10-year and 50-year storm events. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Therefore, the Project would not 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. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[60,61] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is not located within a 100 year flood hazard area as mapped by FEMA or by the City. In addition, the Project Site is not located within a tsunami hazard area as mapped by the State.[62] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project. No impacts due to inundation from a seiche, tsunami, or flood hazard are anticipated to occur. No further analysis of this topic in an EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in that region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a TMDL. As discussed in the Drainage Report, the Project Site runoff leads into the Dominguez Channel Watershed. Constituents of concern listed for Dominguez Channel above Vermont Avenue under California's Clean Water Act Section 303(d) List includes indicator bacteria, zinc, copper toxicity, and lead. Listed pollutants with TMDL in Dominguez Channel above Vermont Avenue include zinc, copper toxicity, and lead. Constituents of concern listed for Dominguez Channel below Vermont Avenue under California's Clean Water Act Section 303(d) List includes polychlorinated biphenyls, benzo(a)pyrene, pyrene, phenanthrene, chrysene, benzo(a)anthracene, dieldrin (tissue), indicator bacteria, lead, benthic community effects, toxicity, chlordane (tissue) copper, and DDT (tissue and sediment). Listed pollutants with TMDL in Dominguez Channel below Vermont Avenue include polychlorinated biphenyls, benzo(a)pyrene, pyrene, phenanthrene, chrysene, benzo(a)anthracene, dieldrin (tissue), lead, benthic community effects, toxicity, chlordane (tissue) copper, and DDT (tissue

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60 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1760F, effective September 26, 2008.

61 City of Los Angeles 2018 Local Hazard Mitigation Plan, Figure 10-7, Mapped Flood Areas in West Los Angeles APC, p. 10-14.

62 California Department of Conservation, Los Angeles County Tsunami Hazard Areas, www.conservation.ca.gov/cgs/tsunami/maps/los-angeles, accessed July 19, 2024.

and sediment).The County of Los Angeles, the City of Los Angeles, and all other cities in the Dominguez Channel Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The City along with other agencies in the Dominguez Channel Watershed are currently developing an EWMP. The EWMP will identify the measures for compliance with all Dominguez Channel TMDLs and other water quality mandates, while maximizing potential benefits of stormwater for local water supply.[63]

Potential pollutants generated by the Project would be typical of office and industrial uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Dominguez Channel Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is located within the highly urbanized Westchester–Playa del Rey Community Plan area and is currently developed with commercial uses as well as associated surface parking. The Project Site does not currently contain residential uses. The area surrounding the Project Site is urbanized and includes a mix of low-rise buildings containing a variety of industrial, commercial, and residential uses.

[63] City of Los Angeles, LA Sanitation, Dominguez Channel, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ewmp-dc?_adf.ctrl-state=132119n0hg_5&_afrLoop=18283164496393533#!, accessed July 19, 2024

The Project proposes the demolition of the existing rental car facility and construction of either one or three industrial buildings. The Project Site would maintain its established zoning designation of [T][Q]M1-1 and the proposed uses on the Project Site would be consistent with the mix of uses located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. Additionally, the Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

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

a. Would the project 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. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[64,65,66] The Project Site is also not located within a

[64] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

[65] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

[66] City of Los Angeles, Department of City Planning, Los Angeles General Plan Conservation Element, Exhibit A.

City-designated oil field or oil drilling area.[67] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

b. Would the project 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. Refer to Response to Checklist Question XII.a., Mineral Resources, above. No impact would occur, and no further evaluation of this topic in an EIR is required.

XIII. NOISE

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

a. Would the project result in 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?

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

[67] California Department of Conservation, CGS Information Warehouse: Mineral Land Classification, https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc , accessed July 19, 2024.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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?

Potentially Significant Impact. The Project Site is located within two miles of the Los Angeles International Airport, which is located west of the Project Site. Given the distance between the Project Site and the nearest airport, the Project could expose people residing or working in the Project area to excessive noise levels. Therefore, impacts would potentially be significant, and further evaluation of this topic 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. Would the project 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. As discussed in Section 3, Project Description, of this Initial Study, the Project does not include a housing component and thus would not directly introduce a new residential population that contributes to population growth in the vicinity of the Project Site or the Westchester–Playa del Rey Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time during which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in Section 3, Project Description, of this Initial Study, the Project is comprised of two options that would each construct new industrial uses. Option 1 would develop a single building that would comprise of 80,000 square feet of office floor area and 355,390 square feet of warehouse floor area, and Option 2 would develop three individual buildings that would comprise 90,000 square feet of office floor area and 320,056 square feet of warehouse floor area. Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled (VMT) Calculator, the Project is estimated to generate 637 net new employees to the Project Site under Option 1 and 642 net new employees to the Project Site under Option 2.[68,69] According to SCAG's 2024–2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2024 is approximately 1,974,725 employees.[70] In 2027, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 2,005,813 employees.[71] Therefore, the projected employment growth in the City between 2024 and 2027 based on SCAG's 2024–2050 RTP/SCS is approximately 31,088 employees. Thus, under Option 1, the Project's estimated 637 net new employees would constitute 2.05 percent of the employment growth forecasted between 2024 and 2027. Under Option 2, the Project's estimated 642 net new employees would constitute 2.07 percent of the employment growth forecasted between 2024 and 2027.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, the potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project

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68 LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The employee generation rate 0.001 employee per square foot for "Light Industrial" land use is applied to the 37,860 square feet of rental car facility to be removed. The rate of 0.001 employee per square foot for "Light Industrial" land use is applied to the 355,390 square feet of industrial uses to be constructed under Option 1, and the 320,056 square feet of industrial uses to be constructed under Option 2. The rate of 0.004 employee per square foot for "General Office" land use is applied to the 80,000 square feet of office to be constructed under Option 1, and the 90,000 square feet of office to be constructed under Option 2. The existing structures to be removed produce approximately 38 employees (rental car facility 37,860 square feet * 0.001 = 38). Under Option 1, the Project would produce an estimated 675 employees (light industrial 355,390 square feet * 0.001 = 355) + (office 80,000 square feet * 0.004 = 320). Accounting for the existing uses to be removed, the Project would produce an estimated 637 net new employees. Under Option 2, the Project would produce an estimated 680 employees (light industrial 320,056 square feet * 0.001 = 320) + (office 90,000 square feet * 0.004 = 360). Accounting for the existing uses to be removed, the Project would produce an estimated 642 net new employees.

69 The existing occupied uses to be removed include a rental car facility.

70 The 2024 values for employment are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2024.

71 The 2027 values for employment are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2027.

Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since some of the employment opportunities generated by the Project could be filled by people already residing in the vicinity of the Project Site or others who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population growth either directly or indirectly. Impacts would be less than significant, and no further evaluation of this topic is required in the EIR.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Project Site is currently developed with a rental car facility. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. While some new employees may relocate to the vicinity of the Project Site, most would not, and the potential indirect increase in population would not be substantial. Specifically, employment opportunities would likely be filled be the large labor pool of people already residing in vicinity of the Project Site and other employees would commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Impacts related to the displacement of people or housing would be less than significant, and no further evaluation of this topic is required in the EIR.

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. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by LAFD Fire Station No. 95 located at 10010 International Road (approximately 0.8 miles south of the Project Site). An additional station within two miles of the Project Site is LAFD Fire Station No. 5 located at 8900 Emerson Avenue (approximately 1.2 miles west of the Project Site).[72]

Construction

Project construction could potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times along adjacent streets due to travel time delays caused by traffic during the Project's construction phase. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management (CTM) Plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

Operation

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 638 employees under Option 1 and 642 under Option 2. Thus, the daytime population within Fire Station No. 95's service area would increase by approximately 637 persons under Option 1 and 642 under Option 2, as compared to existing conditions. This daytime population projected to be generated by the Project would increase the

[72] LAFD, Find Your Station, www.lafd.org/fire-stations/station-results, accessed July 22, 2024.

demand for LAFD fire protection and emergency medical services. However, the Project would comply with all applicable provisions set forth in the City Building Code and Fire Code regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as required by LAFD. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit.

As discussed above, LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, range from 0.75 miles for an engine company to two miles for a truck company. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems. As set forth by the LAFD, based on LAMC criteria regarding response distance, the first-due Engine Company should be within 0.75 miles, and the first-due Truck Company within one mile. Based on the response distances from existing fire stations and the type of equipment available at the fire station nearest the Project Site, LAFD has concluded fire protection would be inadequate.[73] At present, LAFD has no immediate plans to increase staffing or resources in the area. However, the LAFD would be consulted during final building design to ensure adequate compliance with the Building and Fire Codes prior to the issuance of any construction permits. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, the Project would not result in the need for new or physically altered fire facilities.

With regard to emergency vehicle access during operation, as described in Section 3, Project Description, of this Initial Study, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing dedicated emergency vehicle access. Under Option 1, an emergency vehicle access (EVA) driveway would be located on the eastern portion of the Project Site on Arbor Vitae Street connecting to Interceptor Street and an additional EVA driveway would be located along the northern portion of the Project Site connecting the western portion of the Project Site via Interceptor Street to the east portion of the Project Site via Interceptor Street. Under Option 2, an EVA access driveway would be located on the eastern portion of the Project Site along Arbor Vitae Street. Compliance with applicable City Building Code and Fire Code requirements, including EVA, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project.

Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. Based on fire flow

[73] Written correspondence from David Perez, Fire Marshal, Fire Marshall Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department included as Appendix IS-5 of this Initial Study, May 20, 2024.

standards set forth in LAMC Section 57.507.3, LAFD has set the fire flow requirement for the Project at 12,000 gallons per minute (gpm) available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required). As discussed in the Water Infrastructure Assessment Report, included as Appendix IS-6 of this Initial Study, the IFFAR shows there would be sufficient capacity in the existing water infrastructure system under a 12,000 gpm fire flow with the installation of one new fire hydrant along Airport Boulevard as set forth in Project Design Feature WAT-PDF-1. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demand. In addition, the Project would install a fire sprinkler suppression system in the proposed building to reduce or eliminate the public hydrant demands.[74] Per LAMC 94.2020.0, which adopts by reference NFPA 14-2013, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. With the proposed fire sprinkler system and implementation of Project Design Feature WAT-PDF-1, adequate fire flow and fire suppression would be provided to the Project Site to serve the Project, and impacts would be less than significant.

Based on the above, the Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Therefore, the Project would not result in the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Impacts would be less than significant, and no further evaluation of this topic is required in the EIR.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Less Than Significant Impact. Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located in Reporting District 1488 within the jurisdiction of the LAPD's Central Bureau, and is served by the Pacific Community Police Station located at 12312 Culver Boulevard, approximately 4.6 miles northwest of the Project Site.[75] This station has a service area encompassing 25.74 square miles with a population of over 200,000 people.[76] As previously noted, the Project does not include the development of residential uses. Therefore, the Project would not directly affect the existing officer-to-resident ratio within LAPD's West Bureau. However, the Project would introduce a new employee and visitor population to the Project Site, which could result in an indirect demand for police services. These employment opportunities would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site and who are already included in the residential population of the LAPD's West Bureau. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working at the Project Site.

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74 Cannon Group, Water Infrastructure Assessment Report, July 2024. Refer to Appendix IS-6 of this Initial Study.

75 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

76 Los Angeles Police Department, Pacific Community Police Station, https://www.lapdonline.org/lapd-contact/west-bureau/pacific-community-police-station/?zip=9000%20Airport%20boulevard%20Los%20Angeles%2090045, accessed July 19, 2024.

Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for LAPD's West Bureau and the officer-to-resident ratio would remain at its current level.

However, the Project would incorporate security features to reduce the demand for police protection services. These features would include sufficient lighting throughout the Project Site to ensure safety and visibility and well illuminated entryways, walkways, and parking areas to eliminate areas of concealment. Additionally, prior to the issuance of a building permit, the Applicant would submit the Project plans to LAPD for review regarding the incorporation of feasible crime prevention features as well as access routes and other information that might facilitate police response. In addition to the implementation of these design features, which would help offset the Project-related increase in demand for police services, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

Furthermore, the Project would not impede police access to the Project Site. The Project would not result in the permanent closure of any local public streets, and access to the Project Site would continue to be provided from adjacent streets. Additionally, in accordance with California Vehicle Code (CVC) Section 21806, drivers of police vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

Notwithstanding, consistent with the decision in City of Hayward v. Board of Trustees of California State University and the requirements of California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs, that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified the need for any new station construction in the area either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently of the Project pursuant to CEQA. Further analysis, including of a specific location for a future police station, would be speculative and beyond the scope of this document.

Overall, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Therefore, Project operations would not necessitate the provision of new or physically altered police facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Impacts would be less than significant, and no further evaluation of this topic is required in the EIR.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of LAUSD, which is divided into seven local districts.[77] The Project Site is located in District 4 and is served by Westport Heights Elementary School, located 1.2 miles north of the Project Site, Orville Wright Middle School, located 2.1 miles northwest of the Project Site, Katherine Johnston STEM Academy, located 3.1 miles west of the Project Site, and Westchester Enriched Sciences Magnets, located 3.1 miles west of the Project Site.

Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. In addition, construction workers would be more likely to utilize schools near their places of residence. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts on school facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

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[77] LAUSD, Board of Education Districts Maps 2022-2023, July 19, 2024.

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within a two-mile radius include Ashwood Park, located 1.7 miles northeast of the Project Site, and Siminski Park, located 1.8 miles southeast of the Project Site.

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create an additional demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours.

As discussed in Section 3, Project Description, of this Initial Study, landscaping and open space elements would be used to unify the various buildings and day-to-day activities on the Project Site during operation of the Project through a cohesive plant palette to be used along the streetscape. As such, the Project's on-site outdoor areas would help to offset the demand for off-site parks and recreational facilities that could occur from the Project's net new employees. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. The Project's impacts on parks during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, 72 branch libraries, as well as through Web-based resources.[78] The Project area is served by existing LAPL facilities within the Westchester-–Playa del Rey Community Plan area, including the Westchester – Loyola Village Branch Library, located 2.0 miles west of the Project Site and the Playa Vista Branch Library, located 3.3 miles northwest of the Project Site.[79]

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project Site. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Therefore, impacts on library facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on library facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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78 Los Angeles Public Library Strategic Plan, 2015–2020.

79 Los Angeles Public Library, Branch Map, https://lapl.org/branches?distance%5Bpostal_code%5D=90021&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile, accessed July 19, 2024.

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 facility would occur or be accelerated?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site outdoor areas and may include seating areas for Project employees, thus reducing the likelihood that employees would use local parks and recreational facilities. Therefore, impacts related to parks and recreational facilities would be less than significant, and no further analysis of this topic in the EIR is required.

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

No Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as the Project does not include any residential uses and would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, no impact would occur and no further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. 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. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. The City requires the preparation and submission of a Transportation Assessment for projects that meet the following criteria:

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.
- A transportation assessment is required by City ordinance or regulation.

As described in Section 3, Project Description, of this Initial Study, the Project would introduce new uses to the Project Site and would increase the floor area over existing conditions. As such, the Project may meet the above criteria for preparation of Transportation Assessment. A Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the transportation assessment's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Project would develop one or three new industrial warehouse buildings on the Project Site. However, the Project Site is currently developed with an operating rental car facility that has a high rate of VMT at existing conditions. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the Project would not introduce hazards due to incompatible uses such as farm equipment. However, the Project would include new access improvements, including driveways to the Project Site that would be accessible to trailers and freight trucks. As such, further evaluation of this topic will be provided in the EIR.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by the surrounding roadway network. Emergency vehicular access to the Project Site would be maintained from all roadways surrounding the Project, including Airport Boulevard, Interceptor Street, and Arbor Vitae Street. According to the City's GeoHub system, the nearest disaster routes within the Project area are Manchester Boulevard, approximately 0.3 miles north of the Project Site and Interstate 405, approximately 0.8 miles east of the Project Site.[80] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard

[80] City of Los Angeles GeoHub, Disaster Routes, Disaster Routes (lacity.org) https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.260897%2C-118.302131%2C10.05, accessed July 19, 2024.

to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

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)?

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?

Potentially Significant Impact (a and b). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City mailed a consultation request letter to all applicable tribes on August 6, 2024.

As previously discussed, the Project would require excavations that extend approximately 10 feet below ground surface. As such, construction activities could potentially disturb any existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Further analysis of this topic will be provided in the EIR.

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?	☐	☐	☒	☐

The following analysis is based, in part, on the Water Infrastructure Assessment Report and Sewer Infrastructure Assessment Report prepared for the Project by Cannon Corp. dated July 2024, and included as Appendix IS-6 and IS-7 of this Initial Study, respectively. All specific information regarding historic and existing on-site conditions in the discussion below is from these reports unless otherwise noted.

a. Would the project 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?

Potentially Significant Impact (Energy Infrastructure)/Less Than Significant Impact (Water, Wastewater, Stormwater, Telecommunications Facilities, and Solid Waste). Water, wastewater, electric power, and natural gas systems consist of two components: the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, and energy demand, further analysis of this issue will be provided in the EIR. Water, wastewater, stormwater, and telecommunications facilities are analyzed below.

Water

With respect to water supply, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows were approved by LADWP. Refer to the Water Infrastructure Assessment Report included as Appendix IS-6 of this Initial Study for the IFFAR and Service Advisory Request (SAR).

Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. Based on fire flow standards set forth in LAMC Section 57.507.3, LAFD has set the fire flow requirement for the Project at 12,000 gallons per minute (gpm) available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required). As discussed in the Water Infrastructure Assessment Report, included as Appendix IS-6 of this Initial Study, the IFFAR shows there would be sufficient capacity in the existing water infrastructure system under a 12,000 gpm fire flow with the installation of one new fire hydrant along Airport Boulevard as set forth in Project Design Feature WAT-PDF-1. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demand. In addition, the Project would install a fire sprinkler suppression system in the proposed building to reduce or eliminate the public hydrant demands.[81] Per LAMC 94.2020.0, which adopts by reference NFPA 14-2013, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. Because the SAR submitted to LADWP confirms there is sufficient

[81] Cannon Group, Water Infrastructure Assessment Report, July 2024. Refer to Appendix IS-6 of this Initial Study.

pressure to serve the Project, adequate water pressure is available to operate the proposed fire sprinkler suppression system.[82]

With respect to domestic water use, as shown in Table 3 on page 86, under Option 1, the Project would result in a net increase in average daily water demand of 21,532 gallons per day (gpd) and a total water demand of 23,425 gpd. Additionally, as shown in Table 4 on page 87, under Option 2, the Project would result in a net increase in average daily water demand of 22,603 gpd and a total water demand of 24,496 gpd.

Based upon the SAR and IFFAR results, the existing infrastructure is sufficient to meet the demands of the Project. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Project Design Feature WAT-PDF-1: The Project will install one new fire hydrant that will connect to the existing water mains located along Airport Boulevard.

Wastewater

The wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd), and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd.[83]

With respect to wastewater generation, as shown in Table 5 on page 88, under Option 1, the Project would result in a net increase in average daily wastewater generation of 18,369 gpd and a total wastewater generation of 20,262 gpd. Additionally, as shown in Table 6 on page 89, under Option 2, the Project would result in a net increase in average wastewater generation of 18,509 gpd and a total wastewater generation of 20,402 gpd.

The LAMC includes regulations that require the City to assure available sewer capacity for new projects. A Sewer Capacity Availability Report (SCAR) provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant. Two SCARs for Option 1 and Option 2 (Attachment 3 of the Sewer Infrastructure Assessment Report included in Appendix IS-7 of this Initial Study) were submitted to evaluate the ability of the existing local wastewater conveyance system to accommodate the Project's estimated wastewater flow. In preparing the SCARs, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth, and approved the maximum allowable capacity of 20,262 gpd for Option 1 and 20,402 gpd for Option 2. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a time when a sewer's capacity is already

[82] Cannon Group, Water Infrastructure Assessment Report, July 2024. Refer to Appendix IS-6 of this Initial Study.

[83] LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=1e9ltuxk0_5&_afrLoop=1690868518519671#!, accessed July 19, 2024.

Table 3
Option 1: Estimated Project Water Consumption

Land Use	Floor Area (sf)	Water Consumption Rate (gpd/unit)[a]	Total Water Consumption (gpd)
Existing			
Rental Car Facility	37,860	0.05	1,893
Total Existing			**1,893**
Proposed [b]			
Warehouse	355,390	0.03	10,662
Office	80,000	0.12	9,600
Landscaping			3,164 [c]
Total Proposed			**23,425** [d]
Less Existing to be Removed			**-1,893**
Net Water Consumption (Proposed – Existing)			**21,532 (24.13 AFY)**

gpd = gallons per day

sf = square feet

AFY = acre-feet per year

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 186488 and 184248, the 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code.*

[c] *Landscaping water demand provided by Conceptual Design and Planning Company, 2023.*

[d] *Total may not exactly add up due to rounding.*

Source: Cannon Corp., 2024.

constrained and it would not cause a sewer's capacity to become constrained. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Stormwater

As previously discussed under Checklist Question No. X, Hydrology and Water Quality, with implementation of the Project, the Project Site would reduce the overall percentage of impervious area from 90 percent to 88 percent under Option 1, and 85 percent under Option 2. In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Table 4
Option 2: Estimated Project Water Consumption

Land Use	Floor Area (sf)	Water Consumption Rate (gpd/unit)[a]	Total Water Consumption (gpd)
Existing			
Rental Car Facility	37,860	0.05	1,893
Total Existing			**1,893**
Proposed			
Warehouse	320,056	0.03	9,602
Office	90,000	0.12	10,800
Landscaping			4,094 [c]
Total Proposed			**24,496**
Less Existing to be Removed			**-1,893**
Net Water Consumption (Proposed – Existing)			**22,603 (25.34 AFY)**

gpd = gallons per day

sf = square feet

AFY = acre-feet per year

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 186488 and 184248, the 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code.*

[c] *Landscaping water demand provided by Conceptual Design and Planning Company, 2023.*

Source: Cannon Corp., 2024.

Telecommunications Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Table 5
Option 1: Estimated Project Wastewater Generation

Land Use	Floor Area (sf)	Wastewater Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Existing			
Rental Car Facility	37,860	0.05	1,893
Total Existing			**1,893**
Proposed			
Warehouse	355,390	0.03	10,662
Office	80,000	0.12	9,600
Total Proposed			**20,262**
Less Existing to be Removed			**1,893**
Net Wastewater Generation (Proposed – Existing)			**18,369**

gpd = gallons per day

sf = square feet

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 186488 and 184248, the 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code.*

Source: Cannon Corp., 2024.

Table 6
Option 2: Estimated Project Wastewater Generation

Land Use	Floor Area (sf)	Wastewater Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Existing			
Rental Car Facility	37,860	0.05	1,893
Total Existing			**1,893**
Proposed			
Warehouse	320,056	0.03	9,602
Office	90,000	0.12	10,800
Total Proposed			**20,402**
Less Existing to be Removed			**1,893**
Net Wastewater Generation (Proposed – Existing)			**18,509**

gpd = gallons per day

sf = square feet

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 186488 and 184248, the 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code.*

Source: Cannon Corp., 2024.

b. Would the project 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. Senate Bill 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects as part of the CEQA process. Specifically, Senate Bill 610 requires that for certain projects subject to CEQA, the urban water supplier must prepare a water supply assessment (WSA) that determines whether the projected water demand associated with a project is included as part of the most recently adopted urban water management plan. In accordance with Water Code Section 10912, projects subject to CEQA requiring preparation of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial parks of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;

- Mixed-use projects that include one or more of the above-identified categories; or
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

As previously discussed, under Option 1, the Project would be comprised of approximately 355,390 square feet of industrial uses and approximately 80,000 square feet of office uses for a total floor area of approximately 435,390 square feet, with approximately 637 employees. Under Option 2, the Project would be comprised of approximately 320,056 square feet of industrial uses and approximately 90,000 square feet of office uses for a total floor area of approximately 410,056 square feet with approximately 642 employees. As the Project does not meet the criteria above, a WSA is not required.

Water is provided to the Project Site by the Los Angeles Department of Water and Power. Water is supplied to the City from the Los Angeles Aqueduct, local groundwater, through purchase from the Metropolitan Water District, and recycled water. LADWP's 2020 Urban Water Management Plan (UWMP) anticipates adequate water supplies would be available to serve its service area under normal, single-dry, and multi-dry year conditions through 2045.[84] Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand to the proposed uses. With respect to domestic water use, as shown in Table 3 on page 86, under Option 1, the Project would result in a net increase in average daily water demand of 21,532 or 24.13 acre feet per year (AFY). Additionally, as shown in Table 4 on page 87, under Option 2, the Project would result in a net increase in average daily water demand of 22,603 gpd or 25.34 AFY.

As outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City.[85] The 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.[86] The 2020 LADWP UWMP also furthers the goals of the City's Executive Directive No. 5 and Sustainable City pLAn, addresses the current and future State Water Project (SWP) supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries.[87] By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.[88] Additionally, as reaffirmed by L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[89]

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84 LADWP, 2020 Urban Water Management Plan, May 2021.

85 LADWP, 2020 Urban Water Management Plan, May 2021.

86 LADWP, 2020 Urban Water Management Plan, May 2021.

87 LADWP, 2020 Urban Water Management Plan, May 2021.

88 LADWP, 2020 Urban Water Management Plan, May 2021.

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

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Hyperion Water Reclamation Plant, which provides water treatment for the Project Site, has a current remaining capacity of 175 mgd.[90] With respect to wastewater generation, as shown in Table 5 on page 88, under Option 1, the Project would result in a net increase in average daily wastewater generation of 18,369 gpd and a total wastewater generation of 20,262 gpd. Additionally, as shown in Table 6 on page 89, under Option 2, the Project would result in a net increase in average wastewater generation of 18,509 gpd and a total wastewater generation of 20,402 gpd. As estimated in the Wastewater Infrastructure Technical Report included in Appendix IS-5, this would represent approximately 0.011 percent of the available capacity of the Hyperion Water Reclamation Plant under both options. Therefore, based on the amount of wastewater expected to be generated by the Project, and future wastewater treatment capacity of the Hyperion Water Reclamation Plant, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. Impacts would be less than significant and no further analysis of this topic in an EIR is required.

d. Would the project 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. While the Los Angeles Sanitation and Environment (LASAN) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[91] Ten Class III landfills and one inert landfill are currently operating within the County.[92] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery

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90 LASAN, HWRP, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327340718723642#!, accessed July 19, 2024.

91 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

92 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[93]

Based on the 2021 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at approximately 137 million tons, with a total estimated daily disposal rate of 36,971 tons per day, and the remaining lifespan of each landfill ranges from seven to 34 years.[94] The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 127.44 million tons.[95] The estimated remaining capacity for the County's Class III open to the Project Site is approximately 122.93 million tons as of as of December 31, 2021.[96] In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.[97] This facility has 50.77 million tons of remaining capacity and an average daily in-County disposal rate of 1,292 tons per day.[98] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[99]

The following analysis quantifies the Project's construction and operational solid waste generation.

Construction

As stated above, under Option 1, the Project would be comprised of 355,390 square feet of industrial uses and 80,000 square feet of office uses for a total floor area of 435,390 square feet, with 637 employees. Under Option 2, the Project would be comprised of 320,056 square feet of industrial uses and 90,000 square feet of office uses for a total floor area of 410,056 square feet with 642 employees.

Pursuant to the requirements of SB 1374,[100] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32.1 through 66.32.5 (Ordinance

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93 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

94 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

95 The Class III landfills open to the City of Los Angeles include Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon.

96 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4. The Class III landfills open to the Project Site are those open to the City, not including the Calabasas landfill as the Project Site does not lie within the portion of the City served by this landfill.

97 As of 2021, according to the Los Angeles County Integrated Waste Management Plan 2021 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

98 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4.

99 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

100 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

Based on construction and debris rates established by the U.S. Environmental Protection Agency (USEPA) and after accounting for mandatory recycling, as shown in Table 7 on page 94, under Option 1 the Project would result in 945 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.0019 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 50.77 million tons.[101] Under Option 2, after accounting for mandatory recycling, as shown in Table 8 on page 95, the Project would result in 933 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.0018 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 50.77 million tons.[102] It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, for either option, Project construction would not 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 and strategies identified in the ColWMP or by the City (refer to Response to Checklist Question XIX.e regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

Operation

Under Option 1, as shown in Table 9 on page 96, based on solid waste generation factors from LASAN, the Project would generate a total net increase of 1,338 tons of solid waste per year. Under Option 2, as shown in Table 10 on page 97, based on solid waste generation factors from LASAN, the Project would generate a total net increase of 1,282 tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not account for AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not account for compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a

[101] (945 tons ÷ 50.77 million tons) * 100 = 0.0019 percent.

[102] (933 tons ÷ 50.77 million tons) * 100 = 0.0018 percent.

Table 7
Option 1: Estimated Project Construction and Demolition Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Construction Waste (Proposed Uses)			
Warehouse	355,390 sf	3.89 lbs/sf	691
General Office	80,000 sf	3.89 lbs/sf	156
Demolition Waste (Existing Uses to be Removed)			
Rental Car Facility	37,860 sf	155 lbs/sf	2,934
Total Construction and Demolition Waste			**3,781**
Total Disposal (After 75% Diversion)			**945**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

[b] *One ton is equal to approximately 2,000 pounds.*

Source: Eyestone Environmental, 2024.

reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[103]

Under Option 1, the Project's estimated solid waste disposal of 316 net tons per year represents approximately 0.0003 percent of the remaining capacity (122.93 million tons) at the County's Class III landfills that serve the City.[104] Under Option 2, the Project's estimated solid waste disposal of 303 net tons per year represents approximately 0.0002 percent of the remaining capacity (122.93 million tons) at the County's Class III landfills that serve the City.[105] The Project's estimated solid waste generation for either option would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not 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 or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX.e regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

[103] City of Los Angeles Bureau of Sanitation, Solid Waste Integrated Resources Plan—A Zero Waste Master Plan, October 2013.

[104] (316 tons per year ÷ 122.93 million tons) * 100 = 0.0003 percent.

[105] (303 tons per year ÷ 122.93 million tons) * 100 = 0.0002 percent.

Table 8
Option 2: Estimated Project Construction and Demolition Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Construction Waste (Proposed Uses)			
Warehouse	320,414 sf	3.89 lbs/sf	623
General Office	90,000 sf	3.89 lbs/sf	175
Demolition Waste (Existing Uses to be Removed)			
Rental Car Facility	37,860 sf	155 lbs/sf	2,934
Total Construction and Demolition Waste			**3,732**
Total Disposal (After 75% Diversion)			**933**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

[b] *One ton is equal to approximately 2,000 pounds.*

Source: Eyestone Environmental, 2024.

Table 9
Option 1: Estimated Project Operational Solid Waste Generation and Disposal

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing					
Rental Car Facility	37,860 sf	0.001	38	1.96 tn/emp/yr	74
Total Existing					*74*
Proposed (Buildout)					
Warehouse	355,390 sf	0.001	356	2.91 tn/emp/yr	1,034
General Office	80,000 sf	0.004	320	1.18 tn/emp/yr	378
Total Project	*435,390 sf*				1,412
Total Net Increase					**1,338**
Total Net Disposal (After 76.4-Percent Diversion)[c]					**316**

sf = square feet

emp = employee

tn/emp/yr = tons per employee per year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes light industrial for rental car facility and warehouse, and general office for office use.*

[b] *Solid waste generation rates from CalRecycle 2014 Waste Characterization Study. Assumes Retail Trade-Other for rental car facility, Durable Wholesale & Trucking for warehouse, and Services-Management, Administrative Support, and Social for office.*

[c] *The Zero Waste Progress Report 2013 conducted by the UCLA Engineering Extension's Municipal Solid Waste Management Program reported that the City of Los Angeles has achieved a recycling rate of 76.4 percent.*

Source: Eyestone Environmental, 2024.

Table 10
Option 2 Estimated Project Operational Solid Waste Generation and Disposal

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing Uses					
Rental Car Facility	37,860 sf	0.001	38 emp	1.96 tn/emp/yr	74
Total Existing					*74*
Proposed Uses (Buildout)					
Warehouse	320,056 sf	0.001	320 emp	2.91 tn/emp/yr	931
Office	90,000 sf	0.004	360 emp	1.18 tn/emp/yr	425
Total Project	*410,056 sf*				1,356
Total Net Increase					**1,282**
Total Net Disposal (After 76.4-Percent Diversion)[c]					**303**

sf = square feet

emp = employee

tn/emp/yr = tons per employee per year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes light industrial for rental car facility and warehouse, and general office for office use.*

[b] *Solid waste generation rates from CalRecycle 2014 Waste Characterization Study Assumes Retail Trade, Other for rental car facility, Durable Wholesale & Trucking for warehouse, and Services-Management, Administrative Support, and Social for office.*

[c] The Zero Waste Progress Report 2013 conducted by the UCLA Engineering Extension's Municipal Solid Waste Management Program reported that the City of Los Angeles has achieved a recycling rate of 76.4 *percent.*

Source: Eyestone Environmental, 2024.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste

disposal to resource recovery within the City, resulting in "zero waste" by 2030.[106] The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[107] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[108] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?	☐	☐	☐	☒

[106] City of Los Angeles, RENEW LA Five-Year Milestone Report, June 2011.

[107] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

[108] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As discussed above, the Project Site has a relatively flat topography, is currently developed, and is located in an urbanized area. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.[109,110] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. In addition, as is also discussed above, the Project Site is a fully developed urban infill site that is currently 90 percent impervious and would be reduced to 88 percent impervious under Option 1 or 85 percent impervious under Option 2; there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is located in an urbanized area, and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. As

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[109] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016, http://zimas.lacity.org/, accessed July 19, 2024.

[110] City of Los Angeles, 2018 Local Hazard Mitigation Plan, West Los Angeles APC, Figure 13-8, Wildfire Severity Zones, p. 13-10.

the Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, or emergency water sources to assist with fire suppression in a wildfire area. Therefore, while the Project could require utility improvements to connect the new building(s) to the main infrastructure, such improvements would not be located within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not be considered wildfire area associated infrastructure. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As previously described, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, a wildfire which could result in downstream flooding, landslides, runoff, or other post-fire instability after the wildfire has been extinguished could not occur at the Project Site as no such conditions exist on the Project Site. No impacts regarding wildfire risks or related post-fire conditions such as landslides or slope instability would occur, and no further evaluation of this topic in the EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not have the potential to 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Further, the Project would also comply with applicable regulatory requirements with regard to archaeological regarding the inadvertent discovery of such resources to ensure the appropriate handling of such resources.

As discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: aesthetics; air quality; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and infrastructure (energy infrastructure).

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.)

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. There may be other current and reasonably foreseeable projects located in the vicinity of the Project Site, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and infrastructure (energy infrastructure). The Project would not contribute to cumulative impacts with regard to the following topics, which were determined to be less than significant in this Initial Study:

- **Aesthetics (Scenic Vistas and State Scenic Highways)** With regard to scenic vistas due to the highly urbanized and built out surroundings, development of the Project would not substantially or adversely affect a scenic vista. Further, no such resources are located on the Project Site or in the surrounding area. Additionally, the Project Site is not located along a state scenic highway. Impacts would be less than significant, and could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- **Agriculture, Forest, and Mineral Resources**—With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Project Site or in the

surrounding area. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest, and mineral resources would be less than significant.

- **Air Quality (Odors)**—Due to the site-specific nature, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people are typically assessed on a project-by-project basis. As previously discussed, any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, the Project would not involve the operation of uses typically associated with strong odors. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Impacts would be less than significant, and could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- **Biological Resources**—As it relates to biological resources, the Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, California Fish and Game Code Section 3503, best management practices and standard construction processes during nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect associated with biological resources.

- **Cultural Resources—**The Project would not result in a cumulative impact to any historical resources. CEQA Section 15355 defines a cumulative impact as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." As analyzed above, the Project would not result in direct or indirect impacts on historical resources. Therefore, Project impacts to historical resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

  For archaeological resources, all related projects would be subject to applicable regulations formulated to avoid significant archaeological resource impacts. In addition, as applicable, related projects would include CEQA mitigation and/or the City's standard Conditions of Approval (COA) for archaeological resources. Therefore, through adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on archaeological resources.

  With regard to impacts related to human remains, if human remains were discovered during construction of any related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended and CEQA Guidelines Section 15064.5(e). Therefore, compliance with the regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Geology and Soils (except paleontological resources)**—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a

particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Thus, impacts would not be cumulatively considerable and would be less that significant.

- **Hydrology and Water Quality**—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, the related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. Related projects also would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Lastly, as indicated in Checklist Question No. X.a, the Project would result in less than significant hydrology and water quality impacts. As also indicated in Checklist Question No. X.d, the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

- **Land Use and Planning (Physically divide an established community)**—As discussed above, the Project would be implemented within the boundaries of the Project Site, and would not involve the closure of any surrounding streets that could impede access to surrounding properties. As such, Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects in the vicinity of the Project Site to result in cumulative impacts. Cumulative impacts would be less than significant.

- **Population and Housing**—Not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. As part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population and housing. Thus, any Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services**—With regard to fire protection, the increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire stations would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented, would be required to comply with regulatory requirements related to fire protection services, and would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. In addition, as with the Project, the related projects and other future development projects in the vicinity would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- With regard to police protection, it is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  With regard to public services such as schools, parks/recreational facilities, and libraries, the Project would not generate a residential population that could increase the demand for schools, parks/recreational facilities, and libraries. Therefore, the Project would not contribute to an increased demand for these services. Other related projects could increase the demand for these services and facilities. However, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. Specifically, in the case of schools, the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), residential projects would be required by the LAMC to include open space and pay park fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks/recreational facilities, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Transportation (Emergency Access)**—As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the area and would not be concentrated to a specific location. Furthermore, since modifications to access and circulation plans are

largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service Systems (Water, Wastewater, Telecommunications, Solid Waste)**—With regard to water infrastructure, as with the Project, related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. Furthermore, in accordance with City requirements, prior to ground disturbance, related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. As with the Project, related Projects would be required to ensure that adequate and safe access remains available within and near the related project sites during construction activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  With respect to water supply, LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with related projects along with other projects within the service area of LADWP, would generate demand for additional water supplies. The 2020 UWMP anticipates that the future water supplies would be sufficient to meet existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. In addition, meeting certain criteria would have to prepare a WSA pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  With respect to wastewater, since the HWRP is in compliance with the State's wastewater treatment requirements, and the wastewater generated by the related projects would be typical of urban uses, no industrial discharges into the wastewater system would occur that would exceed the wastewater treatment requirements of the LARWQCB. Additionally, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to stormwater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  Development of the Project and related projects could require new or expanded telecommunications infrastructure. As with the Project, the installation of any required telecommunications infrastructure associated with the related projects would occur during a relatively short duration and would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project

and related projects would not result in significant cumulative impacts with respect to telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, unclassified landfills in the County do not generally have capacity concerns, and the inert landfill serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

- **Wildfire**—The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics; air quality; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and infrastructure (energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.