

CITY OF LOS ANGELES
 OFFICE OF THE CITY CLERK
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 LOS ANGELES, CALIFORNIA 90012
 CALIFORNIA ENVIRONMENTAL QUALITY ACT

DOCUMENT FILED
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 No. 12-18-038-183
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DEC 11 2018

NOTICE OF DETERMINATION

LOS ANGELES, COUNTY CLERK

(Article I – City CEQA Guidelines)

Public Resources Code Section 21152(a) requires local agencies to submit this information to the County Clerk. The filing of this notice starts a 30-day statute of limitations on court challenges to the approval of the project pursuant to Public Resources Code Section 21167.

| | |
|---|------------------------|
| LEAD CITY AGENCY AND ADDRESS: City of Los Angeles Care of City Engineer Department of Public Works, Bureau of Engineering 1149 S. Broadway, Suite 600, Los Angeles CA 90015 | COUNCIL DISTRICT 14 |
|---|------------------------|

| | |
|---|-------------------------------------|
| PROJECT TITLE: (Including its common name, if any) LAPD Evidence Warehouse | CASE NO.: E1908034 C.F.: 18-0937 |
|---|-------------------------------------|

PROJECT DESCRIPTION AND LOCATION:
 The Project is located at 4671 Worth Street and 1925 North Mariana Avenue, Los Angeles, CA 90063. The Project is located within the El Sereno neighborhood of the Northeast Los Angeles Community Planning Area.

The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels.

The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for Los Angeles Police Department (LAPD) evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue.

An Initial Study and Negative Declaration was prepared which contains a more detailed description of the proposed project; these may be obtained at the above address.

| | | |
|--|------------------------------------|-----------------------------|
| CONTACT PERSON: Ken Jackson (Project Applicant) | STATE CLEARINGHOUSE NUMBER: N/A | TELEPHONE (323) 262-0035 |
|--|------------------------------------|-----------------------------|

This is to advise that on December 5, 2018 the City Council of the City of Los Angeles approved the Initial Study/ Mitigated Negative Declaration and made the following determinations:

| | |
|------------------------------------|---|
| SIGNIFICANT EFFECT | <input type="checkbox"/> The project will have a significant effect on the environment. <input checked="" type="checkbox"/> The project will not have a significant effect on the environment. |
| MITIGATION MEASURES | <input checked="" type="checkbox"/> Mitigation measures were made a condition of project approval. <input type="checkbox"/> Mitigation measures were not made a condition of project approval. |
| OVERRIDING CONSIDERATION | <input type="checkbox"/> A Statement of Overriding Considerations was adopted. <input type="checkbox"/> A Statement of Overriding Considerations was not adopted. <input checked="" type="checkbox"/> A Statement of Overriding Considerations was not required. |
| ENVIRONMENTAL IMPACT REPORT | <input type="checkbox"/> An Environmental Impact Report was prepared for project and may be examined at the Office of the City Clerk. <input checked="" type="checkbox"/> An Environmental Impact Report was not prepared for the project. |

| | | |
|--|---|------------------|
| SIGNATURE: <i>ME Martin</i> Maria Martin (213) 485-5753 | TITLE: Environmental Affairs Officer Manager, Environmental Management Group | DATE 12/10/18 |
|--|---|------------------|

DISTRIBUTION: Part 1 - County Clerk Part 2 - City Clerk Part 3 - Agency Record Part 4 - Resp. State Agency

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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
 ROOM 395, CITY HALL
 LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
MITIGATED NEGATIVE DECLARATION
 (Article I, City CEQA Guidelines)

| | | |
|---------------------------------|--|-------------------------------|
| LEAD AGENCY AND ADDRESS: | City of Los Angeles c/o Los Angeles City Engineer 1149 Broadway, Suite 600 Los Angeles, CA 90015-2213 | COUNCIL DISTRICT 14 |
|---------------------------------|--|-------------------------------|

| | |
|---|----------------------------------|
| PROJECT TITLE: LAPD Evidence Warehouse | T.G. Page 635, Grid E2 |
|---|----------------------------------|

PROJECT LOCATION: The Project is located at 4671 Worth Street and 1925 North Mariana Avenue, Los Angeles, CA 90063. The Project is located within the El Sereno neighborhood of the Northeast Los Angeles Community Planning Area.

DESCRIPTION: The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels.

The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for Los Angeles Police Department (LAPD) evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The **City Engineer** of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

| | | |
|---|---|--|
| PERSON PREPARING THIS FORM: Talmage Jordan Environmental Specialist II | ADDRESS: 1149 S. Broadway, Suite 600, MS 939 Los Angeles, CA 90015 | TELEPHONE NUMBER: (213) 485-5754 |
|---|---|--|

| | | |
|--|---|--------------|
| SIGNATURE (Official): Maria E. Martin Maria Martin, Environmental Affairs Officer Environmental Management Group | <small>Digitally signed by Maria E. Martin DN: cn= Maria E. Martin, o=City of Los Angeles, ou=Public Works Bureau of Engineering, email= Maria.Martin@lacity.org, c=US Date: 2018.10.01 13:08:51 -0700'</small> | DATE: |
|--|---|--------------|

**INITIAL STUDY
&
NEGATIVE DECLARATION**

**TENTATIVE PARCEL MAP
SITE PLAN REVIEW
LAPD EVIDENCE WAREHOUSE
4671 WORTH STREET
LOS ANGELES, CALIFORNIA 90063**



LEAD AGENCY:

**CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 NORTH SPRING STREET
LOS ANGELES, CALIFORNIA 90012**

REPORT PREPARED BY:

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 SOUTH HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745**

MAY 31, 2018

LACY 012

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NEGATIVE DECLARATION

PROJECT NAME: LAPD Evidence Warehouse.

APPLICANT: Mr. Ken Jackson, CEO of Camfield Partners L.L.C, 8895 Research Drive, Irvine, California 92618.

ADDRESS: 4671 Worth Street, Los Angeles, California 90063.

CITY/COUNTY: Los Angeles, Los Angeles County.

DESCRIPTION: The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this IS/ND will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for LAPD evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue.

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant environmental impacts. For this reason, the City of Los Angeles determined that a *Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may also be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to degrade the quality of the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.

Marc Blodgett – Consultant to the City of Los Angeles

Date

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SECTION 1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this IS/ND will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for LAPD evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue. Mr. Ken Jackson, CEO of Camfield Partners L.L.C, 8895 Research Drive, Irvine, California 92618.

As part of the proposed project's environmental review, the City of Los Angeles authorized the preparation of this Initial Study.¹ Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Los Angeles, in its capacity as the Lead Agency. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental impacts of the proposed project and that decision-makers have considered such impacts before considering approval of the project. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

- To provide the City information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration;
- To facilitate the project's environmental assessment early in the design and development of the project;
- To eliminate unnecessary EIRs;
- To determine the nature and extent of any impacts associated with the proposed project; and,
- To enable modification of the project to mitigate adverse impacts of the project.

The City also determined, as part of this Initial Study's preparation, that a Negative Declaration is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and the *Notice of Intent to Adopt a Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment.

A 20-day public review period will be provided to allow these agencies and other interested parties to comment on the proposed project and the findings of this Initial Study.² Questions and/or comments should be submitted to the following individual:

¹ California, State of. *Title 14. California Code of Regulations. Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act.* as Amended 1998 (CEQA Guidelines). §15050.

² California, State of. *Title 14. California Code of Regulations. Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act.* as Amended 1998 (CEQA Guidelines). §15060 (b).

Maria Martin, Environmental Management Group Manager
 Los Angeles Department of Public Works Bureau of Engineering
 1149 South Broadway, Suite 600
 Los Angeles, California 90015

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition. This section also includes a checklist that summarizes the findings of this Initial Study.
- *Section 2 Project Description*, provides an overview of the existing environment as it relates to the project site and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis*, includes an analysis of potential impacts associated with the proposed project's construction and the subsequent operation.
- *Section 4 Findings*, indicates the conclusions of the environmental analysis and the Mandatory Findings of Significance.
- *Section 5 References*, identifies the sources used in the preparation of this Initial Study.

1.3 INITIAL STUDY CHECKLIST

The environmental analysis provided in Section 3 of this Initial Study indicates that the proposed project will not result in any unmitigable, significant impacts on the environment. For this reason, the City of Los Angeles determined that a Negative Declaration is the appropriate CEQA document for the proposed project. The findings of this Initial Study are summarized in Table 1-1 provided on the following pages.

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| SECTION 3.1 AESTHETICS | | | | |
| 3.1.A. Would the project have a substantial adverse effect on a scenic vista? | | | | X |
| 3.1.B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | | | | X |
| 3.1.C. Would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | | | X | |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| 3.1.D. Would the project create a new source of substantial light or glare which would adversely affect day- or night-time views in the area? | | | X | |
| SECTION 3.2 AGRICULTURE AND FORESTRY RESOURCES | | | | |
| 3.2.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? | | | | X |
| 3.2.B. Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract? | | | | X |
| 3.2.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))? | | | | X |
| 3.2.D. Would the project result in the loss of forest land or the conversion of forest land to a non-forest use? | | | | X |
| 3.2.E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or the conversion of forest land to a non-forest use? | | | | X |
| SECTION 3.3 AIR QUALITY | | | | |
| 3.2.A. Would the project conflict with or obstruct implementation of the applicable air quality plan? | | | | X |
| 3.2.B. Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation? | | | X | |
| 3.3.C. Would the project expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| 3.3.D. Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people? | | | X | |
| SECTION 3.4 BIOLOGICAL RESOURCES | | | | |
| 3.4.A. Would the project, either directly or through habitat modifications, have a substantial adverse effect 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? | | | | X |
| 3.4.B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | | | | X |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| 3.4.C. Would the project have a substantial adverse effect on State or Federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | | X |
| 3.4.D. Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? | | | | X |
| 3.4.E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| 3.4.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 plans? | | | | X |
| SECTION 3.5 CULTURAL RESOURCES | | | | |
| 3.5.A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines? | | | | X |
| 3.5.B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? | | | X | |
| 3.5.C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries? | | | | X |
| SECTION 3.6 ENERGY | | | | |
| 3.6.A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy, resources, during project construction or operation? | | | X | |
| 3.6.B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency? | | | X | |
| SECTION 3.7 GEOLOGY & SOILS | | | | |
| 3.7.A. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides? | | | X | |
| 3.7.B. Would the project result in substantial soil erosion or the loss of topsoil? | | | X | |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| 3.7.C Would the project be located on a soil or geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | | | X | |
| 3.7.D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property? | | | X | |
| 3.7.E. Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | | | | X |
| 3.7.F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature? | | | X | |
| SECTION 3.8 GREENHOUSE GAS EMISSIONS | | | | |
| 3.8.A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| 3.8.B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? | | | X | |
| SECTION 3.9 HAZARDS & HAZARDOUS MATERIALS | | | | |
| 3.9.A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | |
| 3.9.B. Would the project create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | | X | |
| 3.9.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? | | | | X |
| 3.9.D. Would the project be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code §65962.5, and as a result, would it create a significant hazard to the public or the environment? | | | | X |
| 3.9.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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | | | | X |
| 3.9.F. Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | | X |
| 3.9.G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? | | | | X |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| SECTION 3.10 HYDROLOGY & WATER QUALITY | | | | |
| 3.10.A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | | | X | |
| 3.10.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? | | | X | |
| 3.10.C. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows? | | | X | |
| 3.10.D. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | X | |
| 3.10.E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | | X |
| SECTION 3.11 LAND USE & PLANNING | | | | |
| 3.11.A. Would the project physically divide an established community? | | | | X |
| 3.11.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? | | | | X |
| SECTION 3.12 MINERAL RESOURCES | | | | |
| 3.12.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? | | | | X |
| 3.12.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? | | | | X |
| SECTION 3.13 NOISE | | | | |
| 3.13.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? | | | X | |
| 3.13.B. Would the project result in generation of excessive ground-borne vibration or ground borne noise levels? | | | X | |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| SECTION 3.14 POPULATION & HOUSING | | | | |
| 3.14.A. Would the project induce substantial unplanned population growth in an area, either directly or indirectly? | | | | X |
| 3.14.B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X |
| SECTION 3.15 PUBLIC SERVICES | | | | |
| 3.15.A. Would the project result in substantial adverse physical impacts associated with the provision of 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 in <i>fire protection services</i> ? | | | X | |
| 3.15.B. Would the project result in substantial adverse physical impacts associated with the provision of 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 in <i>police protection services</i> ? | | | | X |
| 3.15.C. Would the project result in substantial adverse physical impacts associated with the provision of 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 in <i>school services</i> ? | | | | X |
| 3.15.D. Would the project result in substantial adverse physical impacts associated with the provision of 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 in <i>other public facilities</i> ? | | | X | |
| SECTION 3.16 RECREATION | | | | |
| 3.16.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? | | | | X |
| 3.16.B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | | X |
| SECTION 3.17 TRANSPORTATION | | | | |
| 3.17.A. Would the project conflict with a plan, ordinance, or policy establishing measures addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths? | | | X | |
| 3.17.B. For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? | | | X | |
| 3.17.C. For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(2)? | | | X | |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| 3.17.D. 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)? | | | X | |
| 3.17.E. Would the project result in inadequate emergency access? | | | | X |
| SECTION 3.18 TRIBAL CULTURAL RESOURCES | | | | |
| 3.18.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)? | | | X | |
| 3.18.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.? | | | X | |
| SECTION 3.19 UTILITIES & SERVICE SYSTEMS | | | | |
| 3.19.A. Would the project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental impacts? | | | X | |
| 3.19.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? | | | X | |
| 3.19.C. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | X | |
| 3.19.D. Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure? | | | X | |
| 3.19.E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? | | | | X |
| 3.19.F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? | | | | X |

**Table 1-1
 Initial Study Checklist**

| Description of Issue | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| SECTION 3.20 WILDFIRE | | | | |
| 3.20.A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project impair an adopted emergency response plan or emergency evacuation plan? | | | | X |
| 3.20.B. Would the project, 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? | | | X | |
| 3.20.C. Would the project require the installation of 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? | | | | X |
| 3.20.D. Would the project expose people or structure to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | | | | X |
| SECTION 3.21 MANDATORY FINDINGS OF SIGNIFICANCE | | | | |
| 3.21.A. The approval and subsequent implementation of the proposed project <i>will not</i> 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? | | | | X |
| 3.21.B. The approval and subsequent implementation of the proposed project <i>will not</i> 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 other effects or probable future projects)? | | | | X |
| 3.21.C. The approval and subsequent implementation of the proposed project <i>will not</i> have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly. | | | | X |



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SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this IS/ND will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. The warehouse will be constructed within a 128,118 square-foot (2.94-acre) site that has frontage on both Marianna Avenue and Worth Street. This building will contain three components, a larger warehouse, separate office space for LAPD evidence employees, and a separate office space for CATS (Commercial Auto Theft). A total of 237 parking spaces will be provided for the project. Access will be provided by two driveway connections along the north side of Worth Street and a ramp connection along the west side of Marianna Avenue. The project is described in greater detail in Section 2.4.

2.2 PROJECT LOCATION

The proposed project site is located within the corporate boundaries of the City of Los Angeles in the El Sereno Community. El Sereno is located approximately three miles northeast of Downtown Los Angeles. The community of El Sereno is bound on the north by the City of South Pasadena; on the east by the City of Alhambra; on the south by the City of Los Angeles communities of East Los Angeles and Boyle Heights, and the City of Monterey Park; and on the west by the communities of Montecito Heights and Lincoln Heights.³ Major physiographic features within the surrounding area include the San Gabriel Mountains, located approximately ten miles to the north; the San Rafael Hills, located six miles to the northeast; and the Los Angeles River, located 2.60 miles to the west.⁴ A regional location map is provided in Exhibit 2-1 and a map of the City is provided in Exhibit 2-2.

The project site is located at the northwest corner of the Worth Street and Marianna Avenue intersection. The site's legal address is 4671 Worth Street. The corresponding Assessor Parcel Numbers (APNs) include 5223-002-007 and 5223-002-015. Major roadways in the vicinity of the project site include Valley Boulevard, located 0.22 miles to the north; Soto Street, located 0.96 miles to the west; and Eastern Avenue, located 308 feet to the southeast.⁵ Regional access to the project site is provided ramp connections to the San Bernardino Freeway (I-10), located 1.32 miles to the southwest along Soto Street. A local map is provided in Exhibit 2-3.

³ Quantum GIS. Shapefile layers for Los Angeles County and the City of Los Angeles.

⁴ Ibid.

⁵ Google Maps. Website accessed May 24, 2018.

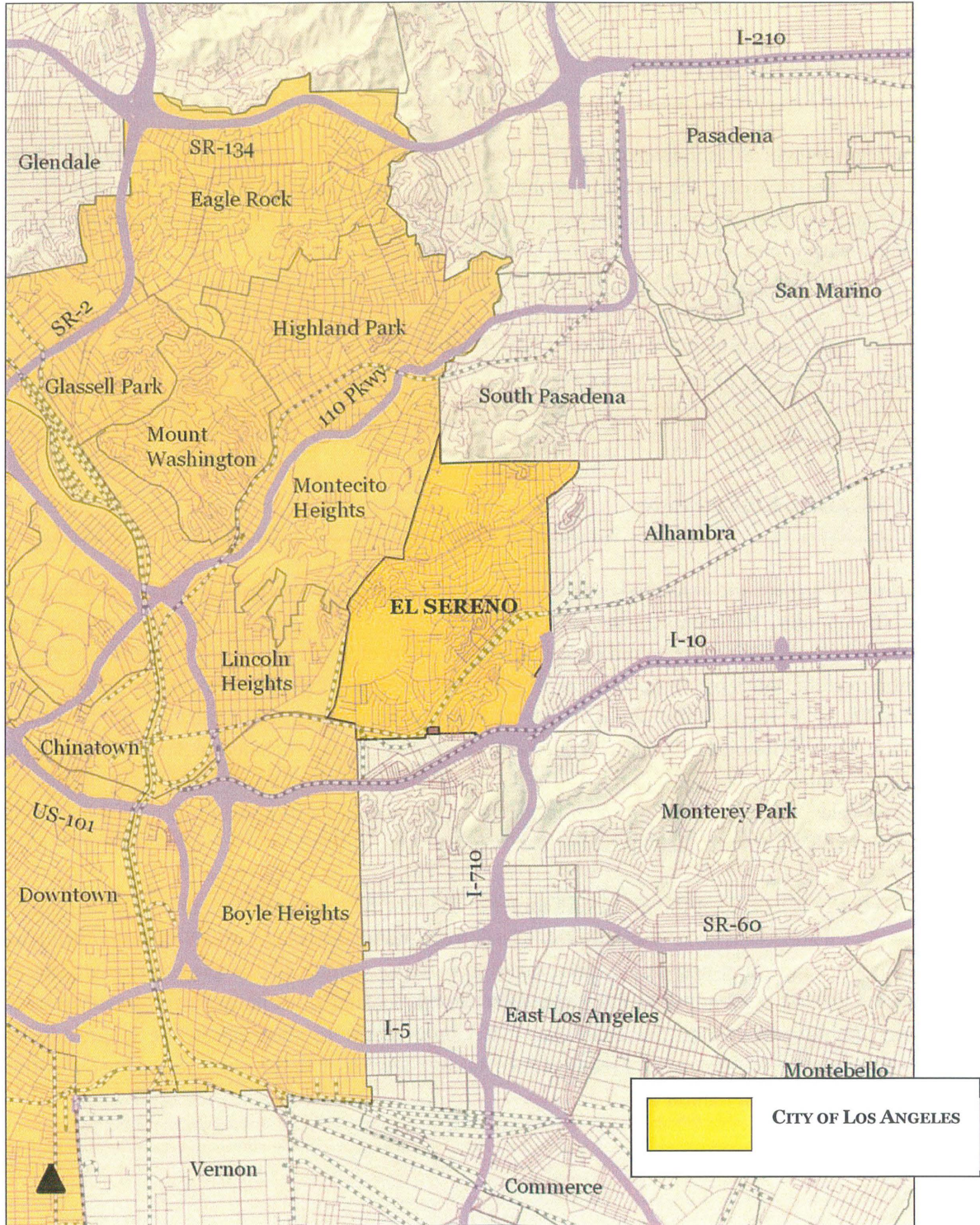


EXHIBIT 2-1
REGIONAL MAP
SOURCE: QUANTUM GIS

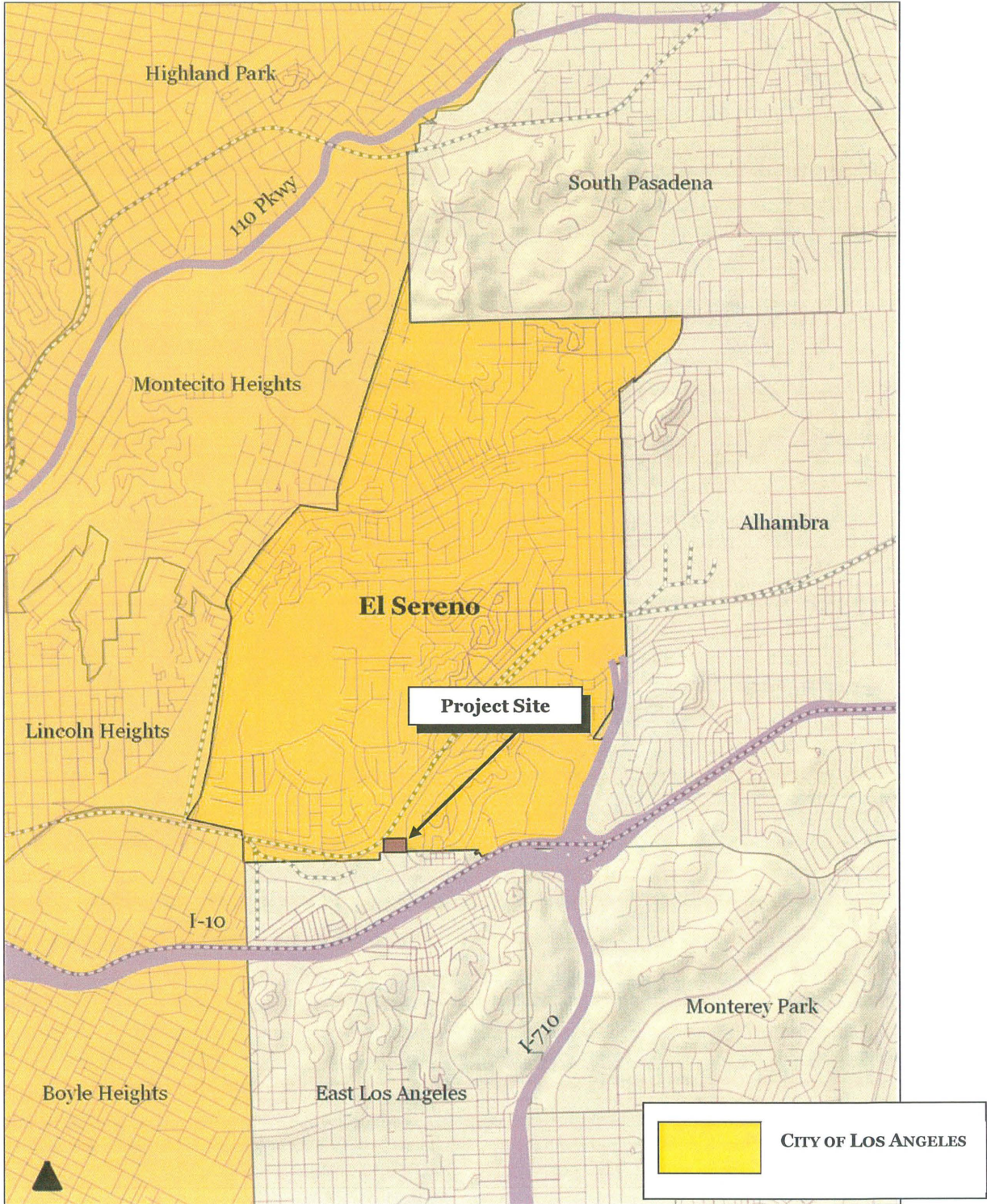


EXHIBIT 2-2
VICINITY MAP
SOURCE: QUANTUM GIS

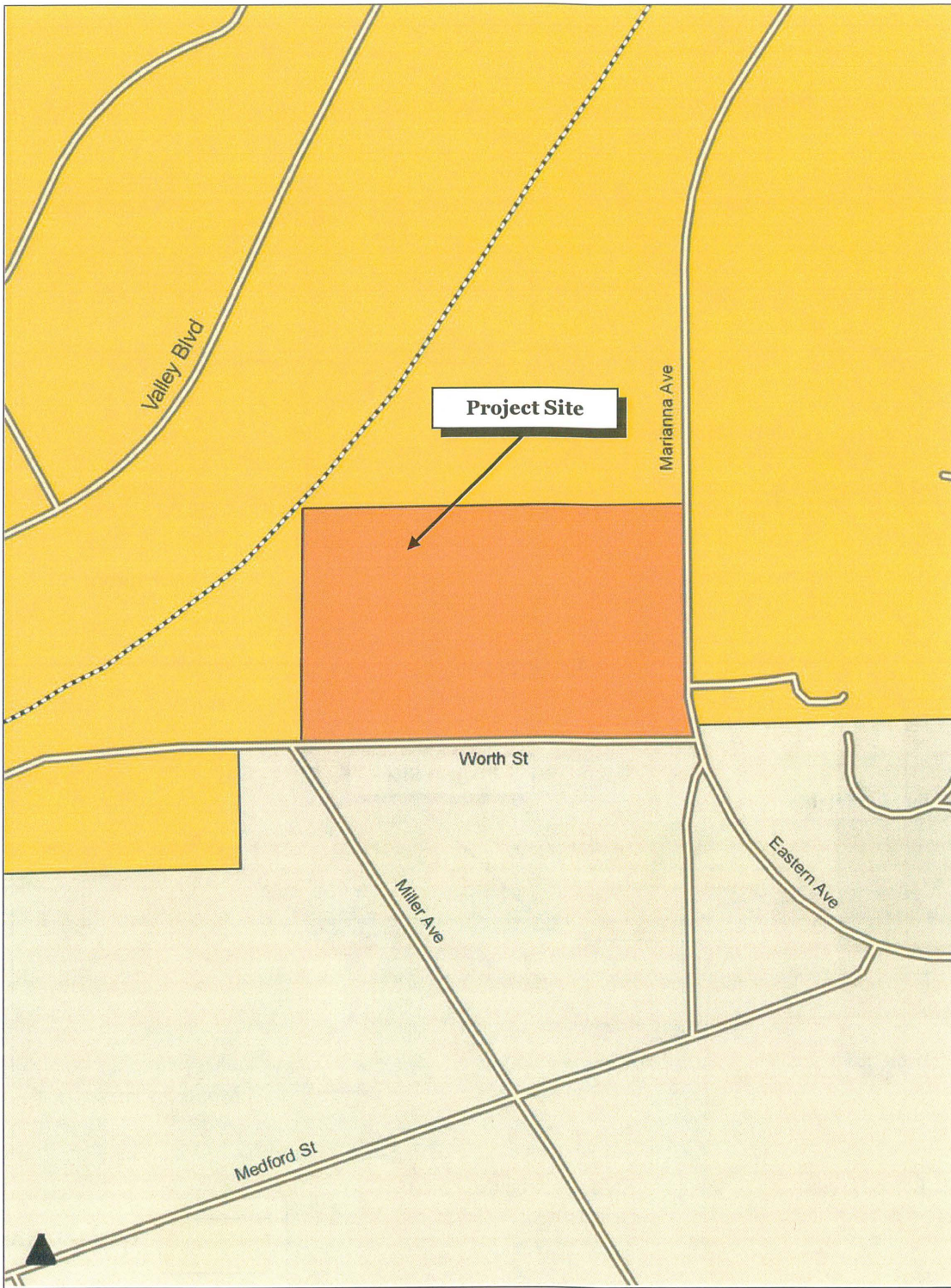


EXHIBIT 2-3
LOCAL MAP
SOURCE: QUANTUM GIS

2.3 ENVIRONMENTAL SETTING

The project site is located in an urban setting and is surrounded on all sides by development. An aerial photograph is presented in Exhibit 2-4. Surrounding land uses and development in the vicinity of the project site include the following:⁶

- *North of site.* Industrial uses abut the project site to the north. A Southern Pacific Railroad right-of-way (ROW) extends in a northeast to southwest orientation along the northwest corner of the project site. Valley Boulevard is located further north.⁷
- *South of site.* Worth Street extends along the south side of the project site in an east to west orientation. Industrial uses occupy frontage along the south side of Worth Street.⁸
- *East of site.* Marianna Avenue is located adjacent to the project site. An apartment complex is located along the east side of Marianna Avenue.⁹
- *West of site.* An industrial building and the Southern Pacific Railroad ROW abut the site to the west.¹⁰

The project site is presently undeveloped and is covered over in dirt, rocks, grass, garbage, a mound of dirt and concrete, and sparse ruderal vegetation. The site is fenced off on all sides by a chain link fence.¹¹

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project involves the subdivision of an existing 6.6-acre site and the subsequent construction and operation of a warehouse that will be used by the Los Angeles Police Department (LAPD). The proposed project will consist of the following elements:

- *Project Site.* The project site consists of a 128,118 square-foot (2.94-acre) parcel located along the north side of Worth Street and the west side of Marianna Avenue. The project Applicant is proposing to construct an approximately 80,000 square-foot warehouse. This building will contain three components, a larger warehouse, separate office space for LAPD evidence employees, and separate office space for CATS (Commercial Auto Theft).

⁶ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

⁷ Ibid.

⁸ Google Maps. Site accessed May 24, 2018.

⁹ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

¹⁰ Ibid.

¹¹ Ibid.



EXHIBIT 2-4
AERIAL PHOTOGRAPH
Source: Google Earth

- *LAPD Evidence Warehouse and Office.* The new warehouse will have a total floor area of approximately 80,000 square feet, a width (east-west) of 416 feet and a depth (north-south) of 203 feet. The building will also have a total height of 44 feet, a lot coverage of 54 percent, and a Floor Area Ratio (FAR) of 0.56 to 1.0. The warehouse will include multiple rooms each with a dedicated purpose. A 10,030 square-foot portion of the warehouse will be reserved for commercial auto theft (CATS). Other various amenities include a 2,500 square-foot break down room; a 4,300 square-foot sorting room; a 1,206 square-foot freezer that will be used to store organic evidence; a 5,025 square feet climate controlled room; a 2,600 square-foot auction staging room; and a 744 square-foot lobby, among others. Additionally, the Applicant will provide 46 bicycle racks with capacity for a total of 414 bicycles. These 46 bicycle racks will be located within the northern portion of the warehouse building. Furthermore, 10,086 square feet of office mezzanine will be included.¹²
- *Parking and Access.* A total of 237 parking spaces will be striped. Of the total number of spaces that will be provided, 16 will be located south of the warehouse building, 20 spaces will be located within the warehouse, and 201 spaces will be located on the roof. A ramp leading up to the rooftop parking area will be installed along the northeast corner of the building along the west side of Marianna Avenue. The Applicant will also provide three dock high doors along the building's south facing elevation. Access to the proposed project will be provided by two driveway connections located along the north side of Worth Street. The driveways will provide access to the visitor parking area, the LAPD employee parking area, and main warehouse. There will be a third driveway which will function as a fire access lane. This fire access lane will extend along the building's northern and western sides and will be located within the adjacent parcel. The fire access lane will provide reciprocal access between the project and the future building that will be erected north of the evidence warehouse.¹³
- *Infrastructure.* The proposed project will include various infrastructure improvements that will better accommodate the construction and operation of the new warehouse. The Applicant will provide a two-foot street dedication along the west side of Marianna Avenue and a ten-foot street dedication along the north side of Worth Street. In addition, the Applicant will install new utility lines within the project site. These new utility lines will be installed during the trenching phase prior to the erection of the warehouse. The project will also require the extension of an off-site water line to the project site. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. An existing sewer line extends along Worth Street in an east-west orientation. The project will continue to utilize this existing sewer line. Lastly, a total of two

¹² Carlile Coatsworth Architects, Inc. *Site Plan*. Plan dated May 25, 2018.

¹³ Ibid.

retaining walls will be installed. A nine-foot tall retaining wall will be provided along the site’s eastern boundary and an 11-foot high retaining wall will be provided along the site’s northern boundary.¹⁴

The site plan is shown in Exhibit 2-5. Conceptual elevations for the project are shown in Exhibit 2-6. A summary table is shown in Table 2-1.

**Table 2-1
 Project Summary Table**

| Project Element | Description |
|---|---|
| Total Site Area | 287,496 sq. ft. (6.6 acres) |
| Project Site Following the Subdivision | 128,118 sq. ft. (2.94 acres) |
| Total Building Floor Area | +/- 80,000 sq. ft. |
| Floor Area Ratio (FAR) and Lot Coverage | 0.56 to 1.0 and 54% |
| Total Height | 44 feet |
| Parking Provided | 237 spaces (16 ground level, 20 within the building, and 201 on the roof) |
| Truck Doors | 3 doors |

Source: Carlile Coatsworth Architects

2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

The project will be open 24 hours a day seven days a week, though limited activity will take place during the evening. Approximately 32 new jobs will be created: 10 for evidence (daytime) and 22 for CATS (likely 24/7) on rotating shifts. The facility will have minimal staffing during the evening hours. The warehouse will be occupied by the Los Angeles Police Department, who will primarily use this building for the storage of evidence and fleet vehicles. Various forms of evidence will be processed and stored on-site, including but not limited to, biological evidence and inorganic evidence such as vehicles impounded by the Department. Ancillary features such as a bio-hazard disposal bin, eyewashes, freezers, and lab tables will be provided. Biological evidence will be processed and analyzed in the break down room. From there, the evidence will either be discarded in the bio-hazard disposal bin or stored away in the freezer room. The evidence employees will be required to adhere to all Division of Occupational Safety and Health, Fire Department, Department of Public Health, and Department of Toxic Substances Control requirements. Furthermore, Material Safety Data Sheet compliant chemical lockers will be included.

The warehouse will also contain vehicles impounded by the Department. These vehicles will be stored within the CATS section of the warehouse. CATS investigators will conduct auto theft investigations involving organized theft groups, chop shops, receivers of stolen vehicles, and components parts. CATS further conduct complex theft investigations on a citywide basis. In addition, CATS is also responsible for investigating cargo hijacking. Cargo hijacking involves the theft and/or hijack of commercial vehicles where the object is cargo.

¹⁴ Carlile Coatsworth Architects, Inc. *Site Plan*. Plan dated May 25, 2018.

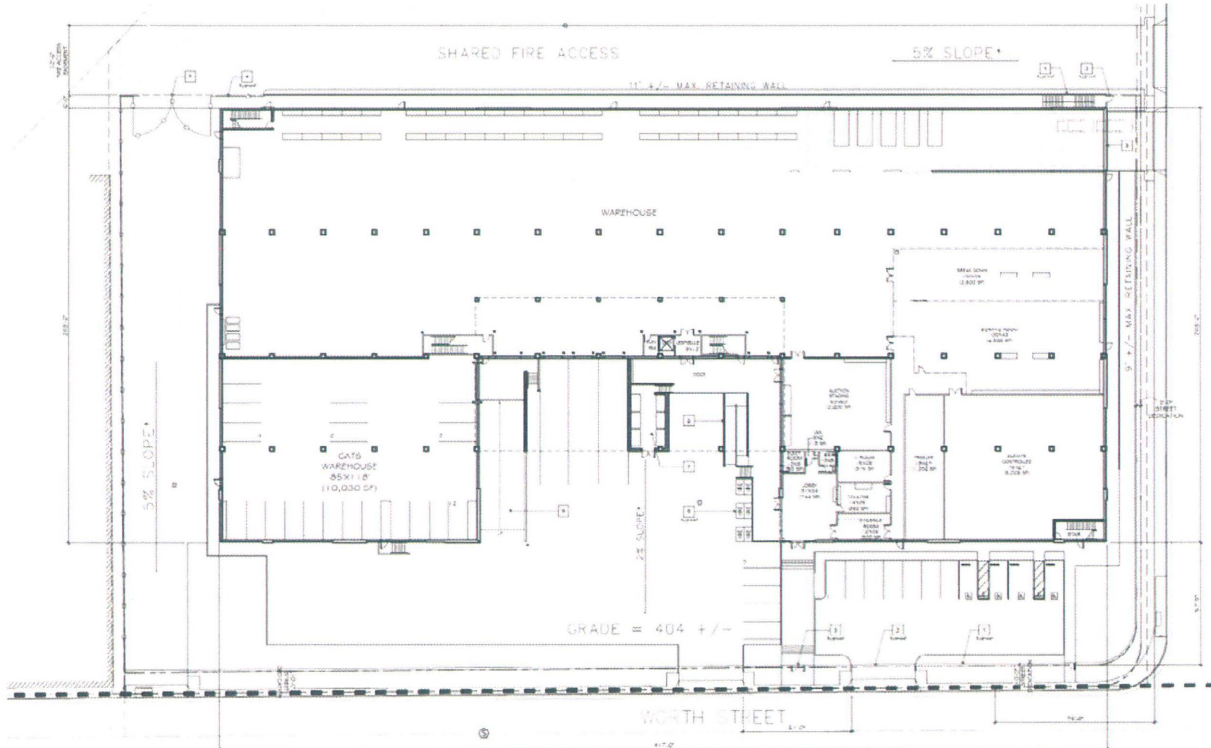


EXHIBIT 2-5
CONCEPTUAL SITE PLAN
Source: Carlile Coatsworth Architects

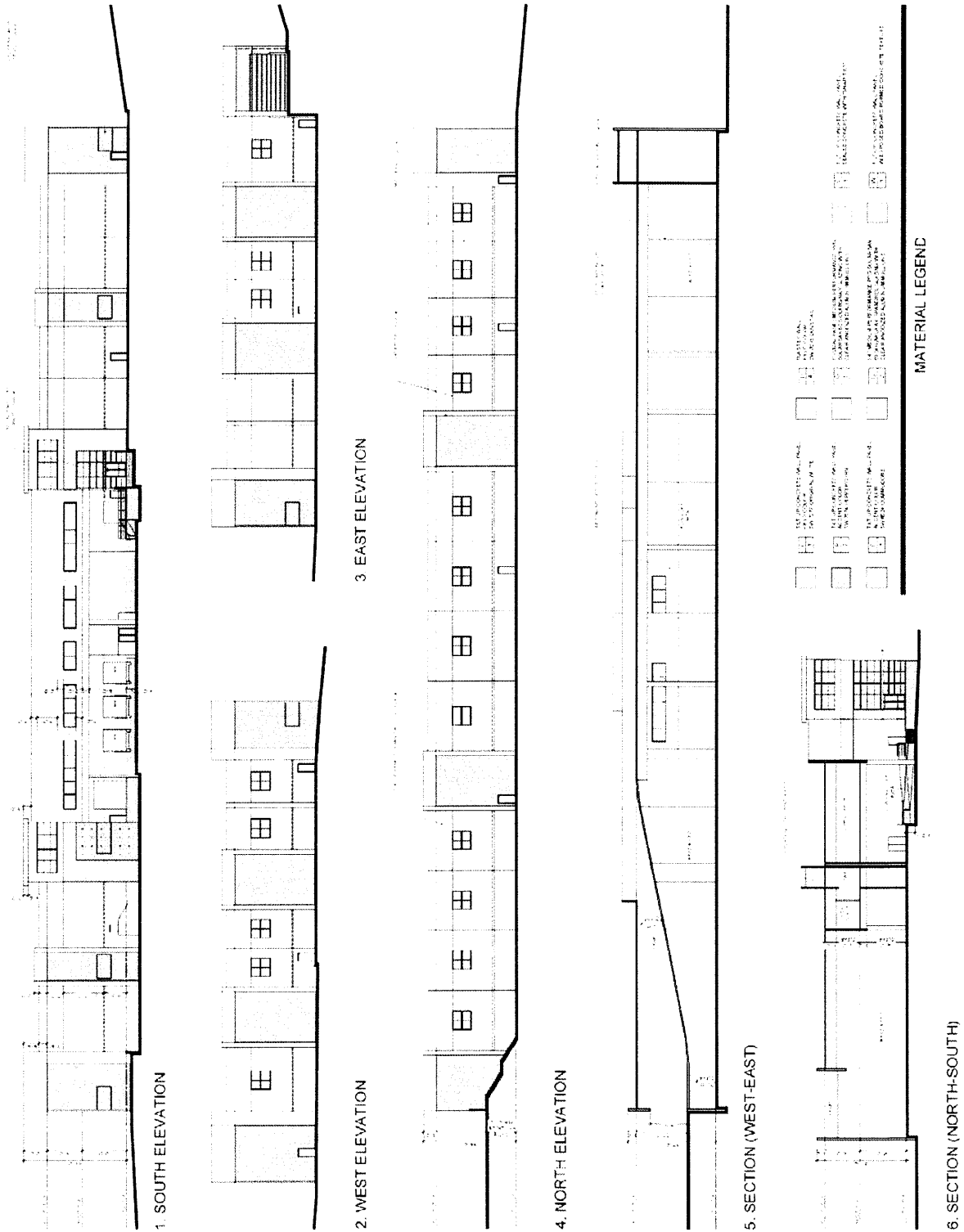


EXHIBIT 2-6
CONCEPTUAL BUILDING ELEVATIONS
Source: Carlile Coatsworth Architects

Often these thefts involve “Hijack/Kidnap” of commercial vehicles by force or fear, or by forcing the drivers to transport the property against their will. The CATS division currently has a total of 17 vehicles in their section, including three bait cars. These bait cars represent the most commonly stolen. They are electronically monitored and can be turned off remotely. Vehicles will enter the CATS area via a ramp that will be provided along the east side of the CATS area.

An auction room will be provided. This will allow the Department to auction off evidence, most notably vehicles, to the general public. An ancillary 2,600 square-foot auction staging room will be provided. Lastly, the new warehouse facility will also accommodate the long-term storage of 100 fleet vehicles. These vehicles will be stored on the roof deck. Since these vehicles will be stored long-term, a minimal number of daily trips will result. The project will result in two to three truck trips per week, and up to three small truck trips per day.

2.4.3 CONSTRUCTION CHARACTERISTICS OF THE PROPOSED PROJECT

The construction phase for the proposed project would take approximately 13 months to complete. The key construction phases are outlined below:

- *Site Preparation.* The project site will be readied for the construction of the proposed project. This phase will take approximately one month to complete.
- *Grading.* This phase will involve the grading, trenching, and excavation of the site. The building’s footings and new utility lines will be installed during this phase. This phase will take two months to complete.
- *Grading/Water Line Extension.* This phase will involve the temporary closure of a portion of Marianna Avenue. The asphalt will be removed and a portion of the street will be trenched to accommodate the extension of the City-owned water line. Once the water line right-of-way has been excavated, the project team will be able to install the new water line and ancillary lateral lines. This phase will take two months to complete.
- *Construction.* The new concrete tilt-up warehouse will be constructed during this phase. This phase will take approximately four months to complete.
- *Paving.* The parking areas and internal drive aisles will be paved during this phase. Equipment used on-site during this phase would include cement and motor mixers, pavers, rollers, and other paving equipment. This phase will take approximately one month to complete.
- *Landscaping and Finishing.* This phase will involve the planting of landscaping, painting of the warehouse, and the completion of the on-site improvements. This phase will last approximately three months.

2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Los Angeles) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project will require the approval of the following discretionary actions:

- A Tentative Parcel Map to realign the site's existing parcel boundaries (the site consists of two parcels);
- A Site Plan Review for a building larger than 50,000 square feet; and,
- The approval of the Negative Declaration (ND).

SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study prepared for the proposed project analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

- Aesthetics (Section 3.1);
- Agriculture and Forestry Resources (Section 3.2);
- Air Quality (Section 3.3);
- Biological Resources (Section 3.4);
- Cultural Resources (Section 3.5);
- Energy (Section 3.6);
- Geology and Soils (Section 3.7);
- Greenhouse Gas Emissions (Section 3.8);
- Hazards and Hazardous Materials (Section 3.9);
- Hydrology and Water Quality (Section 3.10);
- Land Use and Planning (Section 3.11);
- Mineral Resources (Section 3.12);
- Noise (Section 3.13);
- Population and Housing (Section 3.14);
- Public Services (Section 3.15);
- Recreation (Section 3.16);
- Transportation (Section 3.17);
- Tribal Cultural Resources (Section 3.18);
- Utilities and Service Systems (Section 3.19);
- Wildfire (Section 3.20); and,
- Mandatory Findings of Significance (Section 3.21).

Under each issue area, a description of the thresholds of significance is provided. These thresholds will assist in making a determination as to whether there is a potential for significant impacts on the environment. The analysis considers both the short-term (construction-related) and long-term (operational) impacts associated with the proposed project's implementation, and where appropriate, the cumulative impacts. To each question, there are four possible responses:

- *No Impact.* The proposed project will not result in any adverse environmental impacts.
- *Less than Significant Impact.* The proposed project may have the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Los Angeles or other responsible agencies consider to be significant.
- *Less than Significant Impact with Mitigation.* The proposed project may have the potential to generate a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of the recommended mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant. This finding will require the preparation of an environmental impact report (EIR).

3.1 AESTHETICS

3.1.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse aesthetic impact if it results in any of the following:

- A substantial adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantial degrading of the existing visual character or quality of public views of the site and its surroundings; if the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,
- A new source of substantial light and glare that would adversely affect day-time or night-time views in the area.

3.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista?* • *No Impact.*

Scenic vistas in the area include views of the San Gabriel Mountains (located approximately ten miles to the north) and of Downtown Los Angeles (located approximately four miles to the southwest). The implementation of the proposed project will not impact scenic views of the San Gabriel Mountains or Downtown Los Angeles because views of the aforementioned vistas are obstructed by the existing development. These conclusions are supported by the field survey that was conducted for the project.¹⁵ In addition, there are no residential uses located south or north of the project site that would be sensitive to a loss of views. As a result, no impacts will occur.

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.*

According to the California Department of Transportation (Caltrans), neither Worth Street nor Marianna Avenue are designated scenic highways.¹⁶ The closest scenic highway to the project site is Angeles Crest Highway (SR-2), located 11 miles to the north of the project site. In addition, the vegetation present on-site consists of grass and ornamental species and the project site does not contain any scenic rock outcroppings. Lastly, the project site is undeveloped and does not contain any buildings listed in the State or National registrar (refer to Section 3.5). As a result, no impacts will occur.

¹⁵ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

¹⁶ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov.

C. *Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • Less than Significant Impact.*

The project site is presently undeveloped and is covered over in unmaintained ruderal vegetation. Once constructed, the proposed project will improve the quality of the site by introducing new development characterized by modern architecture, façade treatments, and a neutral color scheme (grey and white walls and blue glazed windows). In addition, the size and mass of the proposed development will be consistent with the other warehouses located in the site's vicinity. As a result, less than significant impacts will occur.

D. *Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area? • Less than Significant Impact.*

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. The apartment complex located along the east side of Marianna Avenue is the closest sensitive receptor to the project site.¹⁷ The predominant source of light impacts will be related to the surface parking lot and building lighting. Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or a driver's vision. The exterior façade would consist of non-reflective materials, such as concrete. In addition, the windows would be comprised of blue reflective glazing, which reduces glare over other transparent surfaces. As a result, no daytime glare-related impacts are anticipated. Nighttime glare and illumination has the potential to result in potentially significant impacts to sensitive receptors. Many sources of light contribute to the ambient nighttime lighting conditions. These sources of nighttime light include street lights, security lighting, wall packs, and vehicular headlights. The outdoor lighting will be controlled by timers. In addition, all lighting must be installed according to these provisions outlined in the City's Municipal Code:

- *Chapter 9, Article 3, Sec. 93.0117.* No exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.
- *Chapter 1, Article 2, Sec. 12.21 A5(k).* All lights used to illuminate a parking area shall be designed, located, and arranged so as to reflect the light away from any streets and any adjacent premises.

¹⁷ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

- *Chapter 1, Article 7, Sec. 17.08C.* Plans for street lighting system shall be submitted to and approved by the Bureau of Street Lighting.

Adherence to the aforementioned code requirements will ensure potential impacts are kept to levels that are less than significant.

3.1.3 MITIGATION MEASURES

The preceding analysis concluded that the proposed project will not result in potentially significant impacts that would require mitigation.

3.2 AGRICULTURE & FORESTRY RESOURCES

3.2.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on agriculture and forestry resources if it results in any of the following:

- The conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance;
- A conflict with existing zoning for agricultural use or a Williamson Act Contract;
- A 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)*);
- The loss of forest land or the conversion of forest land to a non-forest use; or,
- Changes to the existing environment that due to their location or nature may result in the conversion of farmland to non-agricultural use or the conversion of forestland to a non-forest use.

3.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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.*

According to the California Department of Conservation, the Community of El Sereno does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.¹⁸ The project site is currently undeveloped. Since the implementation of the proposed project will not involve the

¹⁸ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur.

- B. *Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract?*
• *No Impact.*

The project site is currently zoned MR1-1 (*Restricted Industrial*).¹⁹ No zone change is required to accommodate the project. Therefore, the project's implementation will not result in a loss of land zoned for agricultural uses. In addition, according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.²⁰ As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

- 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.*

The project site is located in the midst of a larger urban area and no forest lands are located within the El Sereno area. According to the City's municipal code, forest land has a zoning designation of OS (*Open Space*). As previously mentioned, the project site has a zoning designation of MR1-1 (*Restricted Industrial*), and does not contain any forest uses. As a result, no impacts on forest land or timber resources will result from the proposed project's implementation.

- D. *Would the project result in the loss of forest land or the conversion of forest land to a non-forest use?* • *No Impact.*

No forest lands are located within or in the vicinity of the project site. As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation and no impacts will occur.

- E. *Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of Farmland to non-agricultural use or the conversion of forest land to a non-forest use?* • *No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use because the project site is not located in close proximity to farm land or forest land. As a result, no impacts will result from the implementation of the proposed project.

¹⁹ ZIMAS.

²⁰ California Department of Conservation. *State of California Williamson Act Contract Land*.
[ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf](http://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf).

3.2.3 MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impacts on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.3 AIR QUALITY

3.3.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on air quality, if it results in any of the following:

- A conflict with the obstruction of the implementation of the applicable air quality plan;
- A violation of an air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation;
- The exposure of sensitive receptors to substantial pollutant concentrations; or,
- The result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people.

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.
- *Nitrogen dioxide (NO₂)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO₂ is formed when nitric oxide (a pollutant from burning processes) combines with oxygen.
- *Sulfur dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *PM₁₀ and PM_{2.5}* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Projects in the South Coast Air Basin (Basin) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day or 2.50 tons per quarter of reactive organic compounds;
- 100 pounds per day or 2.50 tons per quarter of nitrogen dioxide;
- 550 pounds per day or 24.75 tons per quarter of carbon monoxide;
- 150 pounds per day or 6.75 tons per quarter of PM₁₀;
- 55 pounds per day or 2.43 tons per quarter of PM_{2.5}; or,
- 150 pounds per day or 6.75 tons per quarter of sulfur oxides.

A project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

3.3.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project conflict with or obstruct the implementation of the applicable air quality plan?*
- *No Impact.*

The project area is located within the South Coast Air Basin (Basin), which covers a 6,600 square-mile area within Los Angeles, the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Measures to improve regional air quality are outlined in the SCAQMD's Air Quality Management Plan (AQMP). The most recent AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).²¹ The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Key elements of the 2016 AQMP include enhancements to existing programs to meet the 24-hour PM_{2.5} Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM_{2.5} and ozone. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:²²

- *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.

²¹ South Coast Air Quality Management District. *Final 2016 Air Quality Plan*. Adopted March 2017.

²² South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

- *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2). The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of Los Angeles. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP.

In terms of Criteria 2, the proposed project will not conflict with the regional population forecast and distribution in the 2016 AQMP. According to the 2016 AQMP, the Basin had a population of 16.4 million in 2012 and is projected to have a population of 17.6 million by the year 2023 (these numbers are derived from the 2016-2040 RTP/SCS prepared by SCAG). City-specific growth forecasts are listed within the RTP/SCS. According to the RTP/SCS Demographics and Growth Forecast Appendix, the City of Los Angeles is expected to add approximately 472,700 new jobs through the year 2040.²³ The proposed project will result in 32 new jobs.²⁴ The projected number of new jobs is well within SCAG's employment projections for the City of Los Angeles and the proposed project will not violate Consistency Criteria 2. As a result, no impacts related to the implementation of the AQMP are anticipated.

B. Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation? • Less than Significant Impact.

The entire construction period for the proposed project is expected to last for approximately 13 months (refer to Section 2.4.2) and would include the grading of the site, site preparation, construction of the warehouse and installation of the new water line, and the finishing of the project (pavement areas, painting, and planting of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4.2. As shown in Table 3-1, daily construction emissions are not anticipated to exceed the SCAQMD's significance thresholds.

²³ Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

²⁴ Email communication with Mr. Ken Jackson. Email dated May 29, 2018.

**Table 3-1
 Estimated Daily Construction Emissions**

| Construction Phase | ROG | NO _x | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
|-------------------------------------|--------------|-----------------|--------------|-----------------|------------------|-------------------|
| Site Preparation (on-site) | 1.71 | 19.48 | 7.88 | 0.01 | 2.95 | 1.94 |
| Site Preparation (off-site) | 0.03 | 0.02 | 0.35 | -- | 0.09 | 0.02 |
| Total Site Preparation | 1.74 | 19.50 | 8.23 | 0.01 | 3.04 | 1.96 |
| Grading (on-site) | 1.41 | 16.03 | 6.60 | 0.01 | 2.50 | 1.64 |
| Grading (off-site) | 0.03 | 0.02 | 0.35 | -- | 0.09 | 0.02 |
| Total Grading | 1.44 | 16.05 | 6.95 | 0.01 | 2.59 | 1.66 |
| Building Construction (on-site) | 2.27 | 15.98 | 13.48 | 0.02 | 0.91 | 0.88 |
| Building Construction (off-site) | 0.19 | 1.47 | 1.67 | -- | 0.42 | 0.12 |
| Total Building Construction | 2.46 | 17.45 | 15.15 | 0.02 | 1.33 | 1.00 |
| Paving | 0.90 | 9.17 | 8.90 | 0.01 | 0.52 | 0.48 |
| Paving | 0.06 | 0.04 | 0.58 | -- | 0.14 | 0.03 |
| Total Paving | 0.96 | 9.21 | 9.48 | 0.01 | 0.66 | 0.51 |
| Architectural Coatings (on-site) | 15.84 | 1.83 | 1.84 | -- | 0.12 | 0.12 |
| Architectural Coatings (off-site) | 0.02 | 0.02 | 0.26 | -- | 0.06 | 0.01 |
| Total Architectural Coatings | 15.86 | 1.85 | 2.10 | -- | 0.18 | 0.13 |
| Maximum Daily Emissions | 15.87 | 19.50 | 15.16 | 0.02 | 3.04 | 1.96 |
| Daily Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |

Source: CalEEMod 2016.3.2.

As indicated previously, the project area is located in a non-attainment area for ozone and particulates, therefore, the proposed project will be required to comply with the requirements of SCAQMD *Rule 403, Fugitive Dust*, which requires the implementation of Best Available Control Measures (BACM) for all fugitive dust sources, and the *2016 Air Quality Management Plan (AQMP)*, which identifies BACMs and Best Available Control Technologies (BACT) for area sources and point sources, respectively. According to SCAQMD *Rule 403, Fugitive Dust*, all unpaved demolition and construction areas shall be regularly watered up to three times per day during excavation, grading, and construction as required (depending on temperature, soil moisture, wind, etc.). Watering could reduce fugitive dust by as much as 55 percent. Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls. The aforementioned SCAQMD regulations are standard conditions required for every construction project undertaken in the City as well as in the cities and counties governed by the SCAQMD. The extension of the water line will result in minimal construction emissions. The installation will require the removal of asphalt, trenching, and the use of a crane to lower the pipe into the trench.

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions

related to cleaning products and landscaping equipment. Table 3-2 (shown on the following page) depicts the estimated project operational emissions related to the project's operation.

Table 3-2
Estimated Operational Emissions in lbs/day – Unmitigated

| Emission Source | ROG | NO_x | CO | SO₂ | PM₁₀ | PM_{2.5} |
|----------------------------|-------------|-----------------------|-------------|-----------------------|------------------------|-------------------------|
| Area-wide (lbs/day) | 1.61 | -- | -- | -- | -- | -- |
| Energy (lbs/day) | -- | 0.02 | 0.01 | -- | -- | -- |
| Mobile (lbs/day) | 0.25 | 1.31 | 3.71 | 0.01 | 1.11 | 0.30 |
| Total (lbs/day) | 1.86 | 1.33 | 3.74 | 0.01 | 1.11 | 0.30 |
| Daily Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |

Source: CalEEMod 2016.3.2.

As indicated in Table 3-2, the projected long-term emissions are below thresholds considered to represent a significant impact.

C. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact.

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as *hot-spots*. Three variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. Typically, a CO hot-spot may occur near a street intersection that is experiencing severe congestion (a LOS E or LOS F) where idling vehicles result in ground level concentrations of carbon monoxide. However, within the last decade, decreasing background levels of pollutant concentrations and more effective vehicle emission controls have significantly reduced the potential for the creation of hot-spots. The SCAQMD stated in its CEQA Handbook that a CO hot-spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions.

It is estimated that the project will generate approximately 67 daily trips, seven trips of which will occur during the morning peak hour and seven trips of which will occur during the evening peak hour. As indicated in Section 3.17.2.A, the project generated less than 50 peak hour trips at the study intersections and project trips did not result in a significant impact at the study intersections. Since the project will not result in a degradation of any other study intersection's level of service, the likelihood of a CO hot-spot developing at this intersection is considered remote. Therefore, the project's impacts would be less than significant with respect to CO hot-spots.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.²⁵ These population groups are generally more sensitive to poor air quality. The closest sensitive receptors to the project site include the apartment complex located along the east side of Marianna Avenue, opposite the project site. The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of *localized emissions thresholds* or LSTs. LSTs apply to long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO₂; carbon monoxide (CO) emissions from construction; PM₁₀ emissions from construction; and PM_{2.5} emissions from construction. For purposes of the LST analysis, the receptor distance used was 25 meters.

**Table 3-3
 Local Significance Thresholds Exceedance SRA 2 for 5 Acres of Disturbance**

| Emissions | Emissions (lbs/day) | Type | Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters) | | | | |
|-------------------|---------------------|--------------|--|-------|-------|-------|--------|
| | | | 25 | 50 | 100 | 200 | 500 |
| NO _x | 19.50 | Construction | 221 | 212 | 226 | 250 | 312 |
| CO | 15.16 | Construction | 1,531 | 1,985 | 2,762 | 4,383 | 10,467 |
| PM ₁₀ | 3.04* | Construction | 13 | 40 | 55 | 84 | 174 |
| PM _{2.5} | 1.96* | Construction | 6 | 8 | 14 | 29 | 95 |

Source: CalEEMod Version 2016.3.2.

*= Note: These figures take into account the water of the site up to three times per day, which is a standard condition required by the SCAQMD.

The emissions generated by the construction of the proposed project will not exceed the LSTs identified above. Further analysis of the CalEEMod worksheets indicated that the primary source of construction PM emissions is fugitive dust. Adherence to additional mandatory Rule 403 regulations will reduce fugitive dust emissions to levels that are less than significant.

D. Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people? • Less than Significant Impact.

The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.²⁶ The project is a proposal to construct and operate an evidence collection warehouse. Various forms of evidence will be collected, stored, and processed on-site including biological evidence. The biological evidence will not produce odors that would affect the nearby sensitive receptors.

²⁵ South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.

²⁶ Ibid.

Biological evidence will be processed and analyzed in the break down room. From there, the evidence will either be discarded in the bio-hazard disposal bin or stored away in the freezer room. The evidence employees will be required to adhere to all Division of Occupational Safety and Health, Fire Department, Department of Public Health, and Department of Toxic Substances Control requirements. Furthermore, Material Safety Data Sheet compliant chemical lockers will be included. Since all of the biological evidence will be properly stored and disposed of, the operational impacts are considered to be less than significant.

Truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes.²⁷ Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. In addition, the project's contractors must adhere to SCAQMD Rule 403 regulations, which significantly reduce the generation of fugitive dust. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

3.3.4 MITIGATION MEASURES

The analysis of air quality impacts indicated that less than significant impacts on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.4 BIOLOGICAL RESOURCES

3.4.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- 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 the U.S. Fish and Wildlife Service;
- A substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- A substantial adverse effect on State or federally protected wetlands as defined (including, but not limited to, marsh, vernal, pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- A substantial interference with the movement of any native resident or migratory fish, or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;

²⁷ California, State of. *California Code of Regulations, Title 13, Section 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.*

- A conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans.

3.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project either directly or through habitat modifications, have a substantial adverse effect 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? • No Impact.*

A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer indicated that out of a total of 34 native plant and animal species, there are five threatened or endangered species located within the Los Angeles Quadrangle (which includes El Sereno). These species include:

- *California red-legged frog*: The California red-legged frog is federally listed as a threatened species. This species is found primarily in coastal drainages of central California, from Marin County, California, south to northern Baja California, Mexico. As of 2011, the only known population in Los Angeles County is in San Francisquito Canyon on the Angeles National Forest. The California red-legged frog requires a variety of habitat elements with aquatic breeding areas embedded within a matrix of riparian and upland dispersal habitats (dense forest vegetation). Breeding sites of the California red-legged frog are in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, and other small bodies of water.²⁸ Due to the project site's location and lack of suitable habitat, the California red-legged frog is not likely to be found on-site.
- *Coastal California gnatcatcher*: The coastal California gnatcatcher is federally listed as a threatened bird species. The coastal California gnatcatcher is a small blue-gray songbird which measures approximately 4.5 inches. This species is known or believed to occur along southern California coast area and Baja California. The coastal California gnatcatcher can be found in areas with coastal sage scrub and in habitats of low shrubs (three to six feet tall), generally dominated by California sagebrush, buckwheat, salvia, and prickly-pear cactus.²⁹ Due to the project site's location and lack of suitable habitat, the coastal California gnatcatcher is not likely to be found on-site.

²⁸ United States Fish & Wildlife Service. Environmental Conservation Online System (ECOS). *California red-legged frog (Rana draytonii)*. <https://ecos.fws.gov/ecpo/profile/speciesProfile?spcode=Do2D>. Secondary source: United States Fish & Wildlife Service, Arcata Fish & Wildlife Office. *California red-legged frog (Rana draytonii)*. <https://www.fws.gov/arcata/es/amphibians/crlf/crlf.html>. April 11, 2011.

²⁹ United States Fish & Wildlife Service. Environmental Conservation Online System (ECOS). *Coastal California gnatcatcher (Poliophtila californica californica)*. <https://ecos.fws.gov/ecpo/profile/speciesProfile?spcode=Bo8X>. Secondary source: National Audubon Society. *Coastal California gnatcatcher (Poliophtila californica)*. <http://www.audubon.org/field-guide/bird/california-gnatcatcher>.

- *Southwestern willow flycatcher*: The southwestern willow flycatcher is federally listed and State-listed as an endangered bird species. This bird species is small; usually a little less than six inches in length, and has conspicuous light-colored wingbars. This species is known or believed to occur in Southwestern US. Southwestern willow flycatchers require moist microclimatic and vegetative conditions, and breed only in dense riparian vegetation near surface water or saturated soil.³⁰ Due to the project site's location and lack of suitable habitat, the southwestern willow flycatcher is not likely to be found on-site.
- *Least Bell's vireo*: The least Bell's vireo is federally listed and State-listed as an endangered bird species. Least Bell's vireos are small birds, approximately 4.5 to 5.0 inches long. They have short rounded wings and short, straight bills. Feathers are mostly gray above and pale below. This species is known or believed to occur along California coast. Highly territorial, least Bell's vireos establish breeding territories, ranging in size from one to four acres. Nesting habitat typically consists of well-developed overstories and understories and low densities of aquatic and herbaceous cover.³¹ Due to the project site's location and lack of suitable habitat, the least Bell's vireo is not likely to be found on-site.
- *Bank Swallow*: the bank swallow populations located in Southern California are extinct.³²

The proposed project will not have an impact on the aforementioned species since there is no suitable riparian or native habitat located within, or in the vicinity of, the project site. These species typically require wetland or riparian habitat with native vegetation and access to bodies of water.

An additional search was conducted using the California Native Plant Society's Inventory of Rare and Endangered Plants to ascertain any rare or endangered plant species which may occur in the Los Angeles Quadrangle. The search yielded five results. The following five plants have been identified in the Los Angeles Quadrangle: Davidson's saltscale; Los Angeles sunflower; mesa horkelia; prostrate vernal pool navarretia; and Greata's aster.³³ None of these plants were encountered during the site survey. As indicated previously, the only vegetation that is present on-site consists of ruderal species typically found in an urban environment. As a result, no impacts on any candidate, sensitive, or special status species will result.

³⁰ United States Fish & Wildlife Service. Environmental Conservation Online System (ECOS). *Southwestern willow flycatcher (Empidonax traillii extimus)*. <https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=B094>. Secondary source: United States Department of the Interior, National Park Service. *Southwestern Willow Flycatcher*. <https://www.nps.gov/articles/southwestern-willow-flycatcher.htm>. 2013.

³¹ United States Fish & Wildlife Service. Environmental Conservation Online System (ECOS). *Least Bell's vireo (Vireo bellii pusillus)*. <https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=B067>. Secondary source: The National Wildlife Federation. *Showcase Species: California/Nevada, Least Bell's Vireo*. <https://www.nwf.org/~media/PDFs/Wildlife/LeastBellsVireo.ashx>.

³² California Partners in Flight Riparian Bird Conservation Plan. *BANK SWALLOW (Riparia riparia)*. http://www.prbo.org/calpif/htmldocs/species/riparian/bank_swallow_act2.html

³³ California Native Plant Society, Rare Plant Program. 2018. *Inventory of Rare and Endangered Plants of California (online edition, v8-03 o.39)*. Website <http://www.rareplants.cnps.org> [accessed 11 May 2018]

B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities 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 field survey that was conducted for this project indicated that there are no wetlands or riparian habitats present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.³⁴ In addition, there are no designated “blue line streams” located within the project site. As a result, no impacts on natural or riparian habitats will result from the proposed project.

C. Would the project have a substantial adverse effect on State or federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.

As indicated in the previous subsection, the project site and adjacent developed properties do not contain any natural wetland and/or riparian habitat.³⁵ As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and no impacts will occur.

D. Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? • No Impact.

The site is surrounded by development and lacks suitable habitat for wildlife habitat.³⁶ Furthermore, the site contains no natural hydrological features. Constant disturbance (noise and vibration) from vehicles travelling on the adjacent roadways limit the site’s utility as a migration corridor. Since the site is surrounded by development on all sides and lacks suitable habitat, the site’s utility as a migration corridor is restricted. Therefore, no impacts will result from the implementation of the proposed project.

E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact.

Chapter IV (Public Welfare), Article 6 (Preservation of Protected Trees) of the City of Los Angeles municipal code serves to protect Southern California native tree species.³⁷ The City’s municipal code states:

“Protected tree’ means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree:

³⁴ United States Fish and Wildlife Service. *National Wetlands Inventory*. <https://www.fws.gov/Wetlands/data/Mapper.html>.

³⁵ Ibid.

³⁶ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

³⁷ City of Los Angeles Municipal Code. *Chapter 4 (Public Welfare), Article 6 Preservation of Protected Trees*. Site accessed May 29, 2018.

- Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*).
 - Southern California Black Walnut (*Juglans californica* var. *californica*).
 - Western Sycamore (*Platanus racemosa*).
 - California Bay (*Umbellularia californica*).

This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.”

There are multiple mature trees located along the Marianna Avenue right-of-way. All of the trees are of the same species and appear to be eucalyptus trees, which are not a protected species. As a result, the potential impacts are considered to be less than significant.

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 plans? • No Impact.

The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The closest Significant Ecological Area (SEA) to the project site is the Verdugo Mountains Significant Ecological Area (SEA #40), located approximately nine miles northwest from the project site. The construction and operation of the proposed project will not affect the Verdugo Mountains SEA. Therefore, no impacts will occur.

3.4.3 MITIGATION MEASURES

The analysis of biological resources impacts indicated that no impacts on these resources would occur as part of the proposed project’s implementation. As a result, no mitigation is required.

3.5 CULTURAL RESOURCES

3.5.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may have a significant adverse impact on cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines;
- A substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines;

- The disturbance of any human remains, including those interred outside of dedicated cemeteries.

3.5.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines?* • *No Impact.*

The implementation of the proposed project will not affect a historic structure. As indicated previously, the site is currently undeveloped, though it was previously occupied by Castrol, Inc., a manufacturer of lubricants. Operations ceased in 1995 and since then, all of the structures located on-site were razed.³⁸ Therefore, the project will not affect any historic structure since the site is barren and undeveloped. A search through the California Office of Historic Preservation, California Historical Resources database indicated that the project site does not contain any historic structures listed in the National or California Registrar.³⁹ In addition, the City of Los Angeles maintains a Historic-Cultural Monument List, which includes 1,104 City designated historic resources. The project site is not identified on the list of City designated historic resources.⁴⁰ Since the project will not affect any local, state, or federally designated historic structure, no impacts will occur.

- B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines?* • *Less than Significant Impact.*

The greater Los Angeles Basin was previously inhabited by the Gabrieleño-people, named after the San Gabriel Mission. The Gabrieleño tribe has lived in this region for around 7,000 years.⁴¹ Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin.⁴² The project site is currently undeveloped, though the site has been extensively disturbed as a result of past remediation efforts. In the unlikely event that remains are uncovered by construction crews, all excavation/grading activities shall be halted and the Los Angeles Police Department will be contacted (the Department will then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA will apply in terms of the identification of significant archaeological resources and their salvage. Adherence to the abovementioned standard condition will reduce potential impacts to levels that are less than significant.

³⁸ CalEPA. *Bray Oil/Burmah Castrol, Inc.* https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19290275#sitefacdocs

³⁹ California Office of Historic Preservation. *California Historical Resources*. <http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=30>

⁴⁰ City of Los Angeles Office of Historic Resources. *Historic-Cultural Monument List*. <http://preservation.lacity.org/sites/default/files/HCMDatabase%23021916.pdf>

⁴¹ Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html. Website accessed in December 2014).

⁴² Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/tongva-village-site-1>

C. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?* • *No Impact.*

There are no cemeteries located in the immediate area of the project site. The closest cemetery to the project site is Forest Lawn Memorial Park, located approximately 5.50 miles to the northwest along Glendale Avenue in the City of Glendale.⁴³ The proposed project will be restricted to the designated project site and will not affect the aforementioned cemetery. In addition, it is highly unlikely that any human remains will be encountered during the construction of the proposed project due to the level of disturbance that has occurred in order to accommodate the previous development. However, in the unlikely event that remains are uncovered by construction crews and/or the Native American Monitors, all excavation/grading activities shall be halted and the Los Angeles Police Department will be contacted (the Department will then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b). As a result, the proposed construction activities are not anticipated to impact any interred human remains.

3.5.4 MITIGATION MEASURES

The analysis of potential cultural resources impacts indicated that no significant impacts would result from the proposed project's implementation. As a result, no mitigation is required.

3.6 ENERGY

3.6.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it results in the following:

- A potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; and,
- A conflict with or obstruction of a State or local plan for renewable energy or energy efficiency.

3.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?* • *Less than Significant Impact.*

Table 3-4 below provides an estimate of electrical and natural gas consumption for the proposed project. As indicated in the table, the project is estimated to consume approximately 356,000 kWh of electricity and 2,400 therms of natural gas.

⁴³ Google Earth. Website accessed May 29, 2018.

**Table 3-4
 Estimated Annual Energy Consumption**

| Project | Consumption Rate | Total Project Consumption |
|--|--------------------------|---------------------------|
| Proposed Project (assumes 80,000 sq. ft.) | | |
| Electrical Consumption | 4.45 kWh/sq. ft./year | 356,000 kWh/year total |
| Natural Gas Consumption | 0.03 therms/sq. ft./year | 2,400 therms/year total |

Source: CEC End-Use Survey.

According to the California Commercial End-Use Survey that was prepared for the California Energy Commission, the biggest single end use with warehouse uses is interior lighting, followed by cooling and ventilation.⁴⁴ The report also indicates that heating accounts for most of the gas consumption. It is important to note that the project will include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2016 California Building and Green Building Code requirements. The proposed project will be in accordance with the City’s Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. In addition, the project will be LEED BD+C: New Construction certified. The project will include new light standards and fixtures that will be used as operational and security lighting. Furthermore, the project will provide four Level II electric vehicle chargers and roof mounts for future solar panels. Since the project will be equipped with energy efficient lighting and fixtures, the potential impacts in regard to energy consumption are projected to be less than significant.

B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency? • Less than Significant Impact.

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version address additional items such as clean air vehicles, increased requirements for electric vehicles charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements. The proposed project will include energy efficient lighting and appliances. Furthermore, the building will be LEED certified. Therefore, the project’s potential impacts are considered to be less than significant.

3.6.3 MITIGATION MEASURES

The analysis of potential energy impacts indicated that no significant impacts would result from the proposed project’s implementation. As a result, no mitigation is required.

⁴⁴ Intron. *California Commercial End-Use Survey*. Report dated March 2006.

3.7 GEOLOGY & SOILS

3.7.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it results in the following:

- Direct or indirect cause of potential substantial adverse effects, including the risk of loss, injury, or death involving 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), strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides;
- Substantial soil erosion resulting in the loss of topsoil;
- The exposure of people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Locating a project on an expansive soil, as defined in the California Building Code, creating substantial direct or indirect risks to life or property;
- Locating a project in, or exposing people to potential impacts, including 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; or,
- Direct or indirect destruction of a unique paleontological resource or site or unique geological feature.

3.7.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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), strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides? • Less than Significant Impact.*

The City of Los Angeles is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.⁴⁵ The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to

⁴⁵ California Department of Conservation. *What is the Alquist-Priolo Act* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>

prevent the construction of buildings used for human occupancy on the surface trace of active faults.⁴⁶ A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. According to the State Department of Conservation, the City of Los Angeles is on the list.⁴⁷ The Raymond Fault is the closest Alquist Priolo fault trace to the site.⁴⁸ This fault trace is located 3.5 miles north of the project site.⁴⁹

The potential impacts from fault rupture are considered no greater for the project site than for the surrounding areas. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The proposed warehouse will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from fault rupture. Therefore, the potential impacts resulting from fault rupture are anticipated to be less than significant. The potential impacts in regards to ground shaking would also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The proposed warehouse will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from ground shaking.

Other potential seismic issues include ground failure, liquefaction, and lateral spreading. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in an area that is subject to liquefaction. According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. The potential impacts in regards to liquefaction are considered to be less than significant since the warehouse building will be constructed according to the 2016 Building Code.

Lastly, the project site is not subject to the risk of landslides.⁵⁰ Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project since the project will be constructed according to the most recent building code. Furthermore, the Applicant will import new fill soils capable of supporting the development. Therefore, lateral spreading caused by liquefaction would not affect the project. The underlying soils may be prone to shrinking and swelling (refer to Section 3.6.2.D); however, these soils will be removed and replaced. As a result, the potential impacts in regards to liquefaction and landslides are less than significant.

⁴⁶ California Department of Conservation. *What is the Alquist-Priolo Act* <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>

⁴⁷ California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010*. <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx>

⁴⁸ GIS Shapefile layer provided by the California State Department of Conservation.

⁴⁹ Ibid.

⁵⁰ ZIMAS. The City's ZIMAS program indicates that the site is not located within a landslide zone.

B. Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.

The United States Department of Agriculture's (USDA) Web Soil Survey was consulted to determine the nature of the soils that underlie the project site. According to the USDA Web Soil Survey, the site is underlain by Urban Land-Ballona-Typic Xerorthents soils.⁵¹ The Ballona soils are well drained with medium to high runoff characteristics; however, construction activities and the placement of "permanent vegetative cover" will reduce the soil's erosion risk.⁵² These soils are the only native soils that are present within Urban Land-Ballona-Typic Xerorthents soils complex. The Applicant will remove all soils that are unsuitable for development and will replace the underlying soils with clean fill. In addition, the Applicant will install an 11-foot tall retaining wall along the site's northern boundary and a nine-foot retaining wall along the site's eastern boundary. Once operational, the project site would be paved over and landscaped, which would minimize soil erosion.

The project's construction will not result in soil erosion. The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to Federal NPDES regulations since the project would connect to the City's MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project's contractors must adhere to any construction BMPs identified by the City. As a result, the impacts will be less than significant.

C. Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? • Less than Significant Impact.

The project site is underlain by Urban Land-Ballona-Typic Xerorthents soils. Urban Land-Ballona-Typic Xerorthents soils consist of up to 65 percent of non-native human fabricated fill. The Ballona soils component of the Urban Land-Ballona-Typic Xerorthents complex are well drained with medium to high runoff characteristics.⁵³ The surrounding area is relatively level and is at no risk for landslides. In addition, the Applicant will install retaining walls along the project site's northern and eastern boundary, respectively. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project because the underlying soils will be replaced with new clean fill. Moreover, the proposed warehouse will be constructed according to the most recent California Building Code standards. Therefore, lateral spreading caused by liquefaction will not affect the project.

⁵¹ United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

⁵² United States Department of Agriculture, Soil Conservation Service. *Report and General Soil Map, Los Angeles County, California*. Revised 1969. And United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

⁵³ United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

The soils that underlie the project site may be prone to subsidence due to their shrink swell characteristics. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink.⁵⁴ The Applicant is proposing to remove and replace the underlying fill soils. The fill soils that are susceptible to subsidence and shrinking/swelling (those that consist of clay) will be removed and replaced with fill that is suitable for development.

Lastly, the project will not expose future employees and patrons to collapsible soils since the Applicant is proposing to remove the underlying soils. Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading.⁵⁵ Lastly, the new warehouse will be constructed with adherence to the most recent and stringent building code requirements. As a result, the potential impacts are considered to be less than significant.

D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property? • Less than Significant Impact.

As indicated previously, the site is underlain by Urban Land-Ballona-Typic Xerorthents soils.⁵⁶ Approximately 65 percent of these soils consist of non-native human fabricated fill. In addition, Ballona soils comprise approximately 20 percent of the Urban Land-Ballona-Typic Xerorthents soils. Up to 40 percent of Ballona soils consist of clay. If soils consist of expansive clay, damage to foundations and structures may occur.⁵⁷ The project's implementation will require the removal the underlying fill. Therefore, all soils not suitable for development will be excavated and new fill capable of supporting the project will be imported. As a result, the potential impacts are considered to be less than significant.

E. Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? • No Impact.

No septic tanks will be used as part of proposed project. The project will continue to be connected to the existing sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

⁵⁴ Subsidence Support. *What Causes House Subsidence?* <http://www.subsidencesupport.co.uk/what-causes-subsidence.htm>

⁵⁵ Association of Environmental & Engineering Geologists. *Expansive and Collapsible Soils.* <http://www.aegweb.org/?page=ExpansiveSoil>. Website accessed May 11, 2018.

⁵⁶ United States Department of Agriculture. *Web Soil Survey.* <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

⁵⁷ Natural Resources Conservation Service Arizona. *Soil Properties Shrink/Swell Potential.* http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2_065083

F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature? • Less than Significant Impact.

The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Rocks are classified into three principal types: igneous, metamorphic, and sedimentary. Sedimentary rocks contain the bulk of fossils in the City, although metamorphic rocks may also contain fossils. Igneous rocks do not contain fossils. In addition to igneous and most metamorphic rocks, areas of artificial landfill, streambeds, and beach sand do not contain fossils. The older sedimentary rocks are exposed in the hills and mountains, while younger rock units are present in low-lying and flat valley and basin floors. The majority of igneous rocks in the region are found in the Santa Monica Mountains and the northern San Fernando Valley. Within the City of Los Angeles, metamorphic rocks are found mostly in the Santa Monica Mountains and within scattered exposures around the region.

Direct destruction of fossils within fossil-bearing rock units may result from grading or excavation associated with a project, particularly during the construction phase. Indirect destruction or loss of fossils exposed at the surface may result from increased erosion, human access, or other activity in a project area. Increased access could result from the opening of private or otherwise closed lands, new access routes through sensitive areas, or through excavation or the removal of vegetation.

Although the construction of the proposed project will result in the disturbance of surface and subsurface soils, the surrounding project area is fully developed and has undergone disturbance as part of previous development. For this reason, the likelihood of discovering near surface paleontological resources is considered remote. In addition, grading activities will not extend into native soils. As a result, the potential impacts are considered to be less than significant.

3.7.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impacts related to geology and soils. As a result, no mitigation measures are required.

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 THRESHOLDS OF SIGNIFICANCE

A project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- The potential for conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases.

3.8.2 ENVIRONMENTAL ANALYSIS

A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The SCAQMD has established a draft threshold of significance of 10,000 metric tons of CO₂E (MTCO₂E) per year for new development. Table 3-5 summarizes annual greenhouse gas (CO₂E) emissions from the proposed project. Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit. As indicated in Table 3-5, the CO₂E total for the project is 1,418.61 pounds per day or 0.64 MTCO₂E per day. This translates into a generation of approximately 233.60 MTCO₂E per year, which is below the aforementioned threshold. The project’s construction would result in a generation of 2,714.30 pounds of CO₂E per day or 1.23 MTCO₂E per day. This translates into an annual generation of 448.95 MTCO₂E per year. When amortized over a 30-year period, these emissions decrease to 14.96 MTCO₂E per year. These amortized construction emissions were added to the project’s operational emissions to calculate the project’s true GHG emissions. As shown in the table, the project’s total operational emissions would be 248.56 MTCO₂E per year, which is still below the threshold of 10,000 MTCO₂E per year.

**Table 3-5
Greenhouse Gas Emissions Inventory**

| Source | GHG Emissions (Lbs/Day) | | | |
|---|-------------------------|-----------------|------------------|--|
| | CO ₂ | CH ₄ | N ₂ O | CO ₂ E |
| Long-term Area Emissions | 0.01 | -- | -- | 0.01 |
| Long-term Energy Emissions | 23.99 | -- | -- | 24.13 |
| Long-term Mobile Emissions | 1,392.84 | 0.06 | -- | 1,394.45 |
| Total Long-term Emissions | 1,416.85 | 0.06 | -- | 1,418.61 |
| Total Construction Emissions | 2,703.78 | 0.54 | -- | 2,714.30 |
| Total Long-term Emissions (MTCO ₂ E) with Amortized Construction Emissions | | | | 248.56 MTCO₂E per year |
| Thresholds of Significance | | | | 10,000 MTCO₂E per year |

Source: CalEEMod V.2016.3.2

As indicated in the table, the great majority of the GHG emissions will be generated from mobile sources. The project’s operational GHG emissions were calculated using the CalEEMod version 2016.3.2. The type of activities that may be undertaken once the project is operational have been predicted and accounted for in the model for the selected land use type. It is important to note that the project is an “infill” development, which is seen as an important strategy in combating the release

of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC).⁵⁸ Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. Since the project's operational emissions will be below the quantified threshold of significance, the potential impacts are considered to be less than significant.

B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28 percent reduction in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40 percent reduction in greenhouse gas emissions below 1990 levels by 2030.⁵⁹ The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The emissions generated by the proposed project will be less than the thresholds of significance established for CO₂ (refer to Table 3-5). As a result, no impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are anticipated.

The proposed project will be in accordance with the City's Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. In addition, the project will be LEED BD+C: New Construction certified. The proposed project will include the installation and use of energy efficient lighting. This new lighting will also be controlled by timers to limit wasteful energy consumption. Furthermore, the project will provide four Level II electric vehicle chargers and roof mounts for future solar panels. Lastly, the project is an "infill development" and is seen as an important strategy in reducing regional GHG emissions. As a result, the impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are considered to be less than significant.

3.8.3 MITIGATION MEASURES

The analysis of potential impacts related to GHG emissions indicated that the proposed project would not result in any adverse impacts. As a result, no mitigation measures are required.

⁵⁸ California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council's member agencies. Focusing growth toward infill areas takes development pressure off conservation lands and working lands; it increases transit rider-ship and reduces vehicle trips; it requires less per capita energy and water use than less space-efficient development; it improves public health by promoting active transportation and active lifestyles; and it provides a more equitable mix of housing choices, among other benefits.

⁵⁹ Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030*. <http://gov.ca.gov/news.php?id=18938>

3.9 HAZARDS & HAZARDOUS MATERIALS

3.9.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact regarding hazards or hazardous materials if it results in any of the following:

- The creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- The creation of 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;
- The generation of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Locating the project on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section §65962.5 resulting in a significant hazard to the public or the environment;
- Locating the project within an area governed by an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport that would result in a safety hazard or excessive noise for people residing or working in the project area;
- The impairment of the implementation of, or physical interference with, an adopted emergency response plan or emergency evacuation plan; or,
- The exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire.

3.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants.

The proposed project will involve the construction of an evidence warehouse for the LAPD. The evidence brought into the project may include hazardous and/or medical waste such as bloody weapons and articles of clothing, or other items containing organic matter. Therefore, the LAPD will

be required to comply with Federal and State regulations regarding hazardous materials. The LAPD would also be required to comply with the EPA's Hazardous Materials Transportation Act, Title 42, Section 11022 of the United States Code and Chapter 6.95 of the California Health and Safety Code which requires the reporting of hazardous materials when used or stored in certain quantities. In addition, evidence brought into the facility may also consist of medical waste. As a result, the proposed facility will be required to comply with all pertinent standards that govern the handling and disposal of medical waste. According to the State's Medical Waste Management Act:

“Medical waste” means any biohazardous, pathology, pharmaceutical, or trace chemotherapy waste not regulated by the federal Resource Conservation and Recovery Act of 1976 (Public Law 94-580), as amended; sharps and trace chemotherapy wastes generated in a health care setting in the diagnosis, treatment, immunization, or care of humans or animals; waste generated in autopsy or necropsy; waste generated during preparation of a body for final disposition such as cremation or interment; waste generated in research pertaining to the production or testing of microbiologicals; waste generated in research using human or animal pathogens; sharps and laboratory waste that poses a potential risk of infection to humans generated in the inoculation of animals in commercial farming operations; waste generated from the consolidation of home-generated sharps; and waste generated in the cleanup of trauma scenes. Biohazardous, pathology, pharmaceutical, sharps, and trace chemotherapy wastes that meet the conditions of this section are not subject to any of the hazardous waste requirements found in Chapter 6.5 (commencing with Section 25100) of Division 20.”⁶⁰

The medical waste will be stored in the freezer and cooler, which will protect the integrity of the organic evidence. Soiled waste, medical packaging, bed sheets, and other clothing will be disposed of into properly designated waste storage areas. In addition, biological evidence will be disposed of in specially designated bio-hazard disposal bins. The proposed facility, once operational, will be required to prepare a Medical Waste Management Plan pursuant to Sections 117935 or 117960 of the California Health and Safety Code. Adherence to the pertinent regulations, such as the required preparation of the Medical Waste Management Plan, will reduce potential impacts to levels that are less than significant.

B. Would the project create a significant hazard to the public or the environment, or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact.

The project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).⁶¹ In addition, the project site is not identified on any Leaking Underground Storage Tank database (LUST).⁶² A search through the California Department of Toxic Substances Control's (DTSC) Envirostor database indicated that the

⁶⁰ California Department of Public Health Medical Waste Management Program. Medical Waste Management Act, Chapter 2-Definitions, Section 117690 Medical Waste.

⁶¹ CalEPA. DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

⁶² California State Water Resources Control Board. GeoTracker. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=losangeles.ca>

project site was subject to voluntary cleanup under the oversight of the DTSC. According to the DTSC, more than half of the property area was used for storage of raw materials and finished products. The primary function of the facility was the blending of special lubricants and hydraulic fluids from 1961 until 1995, when operations reportedly ceased at the facility.⁶³ The facility included oil storage tank farms, oil blending processing equipment, chemical storage units, warehouses, a laboratory, and an administrative building. The site was restricted to industrial use due to the presence of inaccessible contaminants. Contaminants that have been identified include chloroform, benzene, Freon 113 and carbon tetrachloride, as well as low levels of metals.⁶⁴ Polychlorinated Biphenyls (PCBs) were detected in soils in one area associated with a heat exchanger. All of the concentrations of PCBs were below the regulatory screening levels.

On-site remediation was undertaken under the oversight of the DTSC in 2005 and approximately 688 cubic yards of contaminated soil was removed from the property. The remediation effort concluded in 2005 and the DTSC approved of the closure of six ground water monitoring wells in September of 2017. A No Further Action Letter was also issued by the DTSC in September of 2017.⁶⁵ As a result, the likelihood of encountering contaminated soil is considered to be remote. Nevertheless, should any remnant contaminants be found, sample borings into native soil will be required by the DTSC.

As stated above, the LAPD will be required to comply with the regulations identified by the California Health and Safety Code and the United States Code regarding the handling and transport of hazardous and medical waste. There are no structures located on-site. Therefore, the risk of encountering lead based paint or asbestos containing materials is minimal. The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. As a result, the potential impacts are considered to be less than significant.

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? • No Impact.

There are no schools located within one-quarter of a mile from the project site. The closest school is Murchison Elementary School, located 0.86 miles to the southwest of the site.⁶⁶ As a result, no impacts will occur.

⁶³ CalEPA. *Bray Oil/Burmah Castrol, Inc.*
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19290275#sitefacdocs

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Google Earth. Site accessed May 29, 2018.

D. Would the project be located on a site, which is included on a list of hazardous material sites compiled pursuant to Government Code Section §65962.5, and, as a result, would it create a significant hazard to the public or the environment? • No Impact.

The *Cortese List*, also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC's Brownfields and Environmental Restoration Program referred to as EnviroStor. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.⁶⁷ Therefore, no impacts will occur.

As indicated previously, the project site was listed as a Voluntary Cleanup Site under the DTSC's Envirostor database. However, a No Further Action Letter was issued by the DTSC in September of 2017.⁶⁸ As a result, no impacts will occur.

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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? • No Impact.

The project site is not located within two miles of an operational *public* airport. The nearest airport is San Gabriel Valley Airport, located approximately nine miles to the northeast. The site is not located within the designated Runway Protection Zone and the proposed project will not penetrate the airport's 20:1 slope. Essentially, the proposed project will not introduce a building that will interfere with the approach and take off of airplanes utilizing the aforementioned airport. The runway protection zones for approaches and takeoffs are 1,000 feet. This protection zone does not extend to the project site. As a result, the proposed project's implementation would not present a safety hazard to aircraft and/or airport operations at a public use airport, and no impacts will occur.

Furthermore, the project site is not located within any 60 Community Noise Equivalent Level (CNEL) boundaries. The proposed project will be 77 feet in height and will be exempt from Federal Aviation Administration (FAA) lighting requirements per FAA AC 70/7460-1L – Obstruction Marking and Lighting with Change. According to Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) tower lighting requirements, all structures exceeding 200 feet above ground level (AGL) must be appropriately marked with tower lights or tower paint. In addition, the Federal Communications Commission governs monitoring requirements. As a result, the proposed project will not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people residing or working in the project area and no impacts will occur.

⁶⁷ CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.
http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm

⁶⁸ CalEPA. *Bray Oil/Burmah Castrol, Inc.*
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19290275#sitefacdocs

F. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? • No Impact.

At no time will Marianna Avenue or any of the surrounding streets be completely closed to traffic. All construction staging areas will be located within the project site. As a result, the project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and no impacts are associated with the proposed project's implementation.

G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands? • No Impact.

According to the City's ZIMAS database, the project site is not located within a very high fire hazard severity zone.⁶⁹ As a result, there are no impacts associated with potential wildfires from off-site locations.

3.9.3 MITIGATION MEASURES

The analysis of hazards and hazardous materials indicated that no mitigation measures would be required.

3.10 HYDROLOGY & WATER QUALITY

3.10.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on hydrology and water quality if it results in any of the following:

- A violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- A substantial decrease of groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- A substantial alteration of the existing drainage pattern of the site or area through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner that would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows;

⁶⁹ ZIMAS. The City's ZIMAS program indicates that the site is not located within a very high fire hazard severity zone.

- Flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation; or,
- Conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

3.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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.

Sections 64.70.01 and 64.72 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code were expanded in 2012 by imposing rainwater Low Impact Development (LID) strategies on projects that require building permits. These LID requirements are required in addition to the preparation of the mandatory Standard Urban Stormwater Mitigation Plan (SUSMP). The LID report identifies set *Low Impact Development* standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal National Pollutant Discharge Elimination System (NPDES) permit on the plans and permit application submitted to the City. The mandatory LID plan would identify operational Best Management Practices (BMPs) that would both reduce the volume of water discharged into the local storm drains and filter out any contaminants present in the stormwater runoff. The implementation of the proposed project would not result in a violation in water quality standards or discharge requirements because the project Applicant would be required to implement the operational Best Management Practices (BMPs) identified in the LID plan. The mandatory LID plan may recommend the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. Adherence to the aforementioned City mandated requirements would ensure that all potential impacts remain at a level that is less than significant.

In addition, the project's construction will not result in a violation of water quality standards or waste discharge requirements. The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to federal NPDES regulations since the project would connect to the City's MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project's contractors must adhere to any construction BMPs identified by the City. As a result, the impacts will be less than significant.

B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge in such a way that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.

The grading that will be done will not extend to depths required to encounter groundwater. Grading and excavation will not extend into native soils. Therefore no direct construction related impacts to groundwater supplies, or groundwater recharge activities will occur.

As indicated in Section 2.4, the project will require the extension of an off-site water line to the project site. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. The extension of the water line will not result in a direct decrease in groundwater supplies since the line will convey water sourced by the LA DWP and not from an existing groundwater well.

Furthermore, the project's contractors will be required to adhere to the applicable Best Management Practices (BMPs) for the construction site. Adherence to the required BMPs will restrict the discharge of contaminated runoff into the local storm drain system. In addition, the BMPs identified in the mandatory LID report may promote groundwater recharge through the filtration and percolation of excess runoff. As a result, the impacts are anticipated to be less than significant.

C. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows? • Less than Significant Impact.

The implementation of the proposed project will reduce the amount of pervious surfaces on-site, though the site's drainage characteristics will remain intact. Stormwater runoff will either be discharged into storm drains located along Marianna Avenue and Worth Street, or will percolate into the ground. No streams or rivers are located within or adjacent to the project site. The project site is located 1.22 miles to the northwest of the Laguna Channel.⁷⁰ The proposed project would be restricted to the designated site and would not alter the course of the Laguna Channel (the channel is noted on the U.S. Fish and Wildlife's National Wetlands Inventory and is a concrete-lined flood control channel).

As indicated previously, the project will increase the amount of impervious surfaces on-site. The increase in the amount of impervious surfaces may lead to an increase in the quantity of stormwater runoff. Additionally, the future impervious surfaces (the new building foot-print, parking areas, etc.) that will be constructed as part of the site's development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas. These pollutants may enter the storm drain system during periods of rainfall. For this reason, the project Applicant will be required to install various stormwater controls identified in the LID. These BMPs will either promote the percolation of excess runoff into the ground, or will facilitate the control discharge of excess runoff into the local storm drains. Therefore, the risk of off-site erosion and/or siltation will be minimal

⁷⁰ Google Earth. Website accessed May 29, 2018.

given the reduced water runoff and the lack of pervious surfaces outside of the project site. Thus, the project's implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; or provide additional sources of polluted runoff. As a result, the potential impacts are considered to be less than significant.

D. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? • Less than Significant Impact.

According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the proposed project site is located in Zone X.⁷¹ This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.⁷² The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. A seiche in the Laguna Channel is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is located inland approximately 17 miles from the Pacific Ocean and the project area would not be exposed to the effects of a tsunami.⁷³ As a result, less than significant impacts are anticipated.

E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? • No Impact.

As stated previously, the project's construction and operation will not interfere with any groundwater management or recharge plan. As a result, no impacts are anticipated.

3.10.3 MITIGATION MEASURES

The analysis indicated that the proposed project would not result in any hydrological, stormwater runoff, or water quality impacts. As a result, no mitigation is required.

3.11 LAND USE & PLANNING

3.11.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on land use and planning if it results in any of the following:

- The physical division and disruption of an established community; or,

⁷¹ Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>

⁷² FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>

⁷³ City of Los Angeles General Plan. *Safety Element Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles*. 1996.

- Causing 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.

3.11.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community?* • *No Impact.*

The project site is located in an urban setting and is surrounded on all sides by development. Surrounding land uses and development in the vicinity of the project site include the following:⁷⁴

- *North of site.* Industrial uses abut the project site to the north. A Southern Pacific Railroad right-of-way (ROW) extends in a northeast to southwest orientation along the northwest corner of the project site. Valley Boulevard is located further north.
- *South of site.* Worth Street extends along the south side of the project site in an east to west orientation. Industrial uses occupy frontage along the south side of Worth Street.
- *East of site.* Marianna Avenue is located adjacent to the project site. An apartment complex is located along the east side of Marianna Avenue.
- *West of site.* An industrial building and the Southern Pacific Railroad ROW abut the site to the west.

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of the adjacent neighborhood and no impacts will occur.

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?* • *No Impact.*

As noted previously, the project site is presently zoned MR1-1 (*Restricted Industrial*). The site's land use designation in the Northeast Los Angeles Community Plan is Limited Industrial. The activities that will be undertaken within the proposed building including vehicle storage and the use of coolers and freezers are permitted within this underlying zoning district. In addition, no Zone Change, General Plan Amendment, Variance, or Conditional Use Permit is required to implement this project. The project is required to undergo a site plan review. Thus, no conflicts to existing land use regulations will occur.

3.11.3 MITIGATION MEASURES

The analysis determined that no significant impacts on land use and planning would result from the implementation of the proposed project. As a result, no mitigation measures are required.

⁷⁴ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

3.12 MINERAL RESOURCES

3.12.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or,
- 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.

3.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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.*

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located on-site.⁷⁵ The nearest well is located 0.31 miles to the northeast of the site along Jade Street.⁷⁶ In addition, according to the Significant Mineral Aggregate Resource Area (SMARA) study area maps prepared by the California Geological Survey, the Community of El Sereno is located within the larger San Fernando Valley P-C Region. However, as indicated in the Generalized Aggregate Resource Classification Map for the San Fernando Valley, the project site is not located in an area where there are significant aggregate resources present.⁷⁷ In addition, the project site is not located in an area with active mineral extraction activities. Thus no impacts will result with the implementation of the proposed project.

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.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

⁷⁵ California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <http://maps.conservation.ca.gov/doggr/index.html#close>

⁷⁶ Ibid.

⁷⁷ California Department of Conservation. *Generalized Aggregate Resource Classification Map for the San Fernando Valley*. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/Plate_2-1.pdf

3.12.3 MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.13 NOISE

3.13.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it results in any of the following:

- The generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; or,
- The generation of excessive vibration or ground-borne noise levels.

3.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact.*

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.⁷⁸ Noise may be generated from a point source, such as a piece of construction equipment, or from a line source, such as a road containing moving vehicles. Because the area of the sound wave increases as the sound gets further and further from the source, less energy strikes any given point over the surface area of the wave. This phenomenon is known as *spreading loss*. Due to spreading loss, noise decreases with distance.

The noise levels are those that would be expected at a distance of 50 feet from the noise source. Composite construction noise is best characterized in a study prepared by Bolt, Beranek, and Newman. In the aforementioned study, the noisiest phases of construction are anticipated to be 89 dBA as measured at a distance of 50 feet from the construction activity. This value takes into account both the number of pieces and spacing of the heavy equipment typically used in a construction effort. In later phases during building erection, noise levels are typically reduced from these values and the physical

⁷⁸ Bugliarello, et. al., *The Impact of Noise Pollution*, Chapter 127, 1975.

structures further break up line-of-sight noise. However, as a worst-case scenario, the 83 dBA value as measured at a distance of 77 feet from the construction activity was used as an average noise level for the construction activities. This value takes into account the extension of the new water line along Marianna Avenue.

The project site is located within an urbanized setting and the ambient noise characteristics reflect the surrounding urban environment. The predominant source of noise in the area is related to traffic on Marianna Avenue and Worth Street. Noise sensitive receptors in the immediate area include the apartments located to the east of the site. There are a number of noise control regulations that are relevant to this project:

- *State of California Building Code.* The State of California has adopted noise standards in areas of regulation not preempted by the Federal government. The State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. Title 24 of the California Code of Regulations, also known as the California Building Code, establishes building standards applicable to all occupancies throughout the State.
- *State of California General Plan Guidelines.* The California Governor's Office of Planning and Research (OPR) provide guidance for the compatibility of projects within areas of specific noise exposure. The OPR Guidelines include a Noise and Land Use Compatibility Matrix that identifies acceptable and unacceptable community noise exposure limits for various land use categories.
- *California Environmental Quality Act.* The California Environmental Quality Act Guidelines establishes significance criteria related to noise. Roadway noise impacts would be considered significant if the project increases noise levels at a noise sensitive land use by 3.0 dBA CNEL and if: (1) the existing noise levels already exceed the residential land use compatibility standard for "normally acceptable" or (2) the project increases noise levels from below the 65 dBA CNEL standard to above 65 dBA CNEL. A substantial increase in noise levels due to stationary noise sources shall be considered 5.0 dBA L_{eq} .

In addition to the aforementioned requirements, the City of Los Angeles established additional noise control requirements identified in Chapter 11 of the City's municipal code. Furthermore, the City establishes permitted hours for construction/demolition. Construction is permitted from 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM on Saturdays and National Holidays. No work is permitted on Sundays. The City also indicates that:

"Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75 dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- (b) 75 dB(A) for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;
- (c) 65 dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors;”

Finally, in order to reduce construction noise levels, the project contractors will be required to adhere to the construction noise regulations described in Section 41.40 (Chapter 4 - Public Welfare) of the City’s municipal code. Adherence to the regulations identified in the aforementioned section will reduce potential impacts to levels that are less than significant.

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, roll-up doors, forklifts, and other equipment. Noise generated within the parking lot would include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA; car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning.

The operation of the proposed project will not expose future employees to excessive noise levels because the project is not considered to be a noise sensitive land use. In addition, the project will not expose the nearby sensitive receptors along the east side of Marianna Avenue to excessive noise since the loading docks will be provided along the building’s south facing elevation, oriented away from the aforementioned residential. Operational noise generated from the truck loading areas will also be reduced by the warehouse building since objects located within the line-of-sight between the source and a point will lead to the attenuation of noise. The southeast portion of the building will extend 87 feet beyond the dock doors, thereby screening the loading areas from the public right-of-way. The building itself may reduce noise levels generated within the loading areas by up to 13 dBA.⁷⁹ It is also important to note that a limited number of trucks will be travelling to the site. Up to three small trucks will visit the site per day, while up to two to three large trucks will visit the site on a weekly basis. As a result, the proposed project will not expose sensitive receptors and employees to excessive noise levels due to the two factors described above and the impacts are anticipated to be less than significant.

⁷⁹ Based on our experiences collecting noise measurements from areas that are located within the line-of site of a noise source and from areas whose line-of-sight with a noise source is obstructed by an existing building. The difference between the readings from the two different locations (taken within the same site or area) is calculated.

B. Would the project result in the generation of excessive ground-borne vibration or ground-borne noise levels? • Less than Significant Impact.

The nearest land uses that may potentially be impacted from ground borne vibration and noise (primarily from the use of heavy construction equipment) are the residential units located along the east side of Marianna Avenue, opposite the project site. As noted in the previous subsection, the noisiest phases of construction are anticipated to be 83 dBA as measured at a distance of 77 feet from the construction activity. The underlying fill soils will be removed and replaced to accommodate the new warehouse. This process will involve the use of excavators to remove the underlying fill; loaders to load asphalt, rocks, demolition debris, and dirt onto haul trucks; and haul trucks to transport construction and demolition waste. The project's implementation will not require deep foundations since the underlying fill soils will be removed and the proposed warehouse will have a maximum height of 44 feet. The warehouse will be constructed over a shallow foundation that will extend no more than three to four feet bgs. The use of shallow foundations precludes the use of pile drivers or any auger type equipment. In order to reduce construction noise levels, the project contractors will be required to adhere to the construction noise regulations described in Section 41.40 (Chapter 4 - Public Welfare) of the City's municipal code.

Furthermore, the cumulative traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). As a result, the traffic noise impacts resulting from the proposed project's occupancy are deemed to be less than significant.

3.13.3 MITIGATION MEASURES

The analysis of potential impacts related to noise indicated that no impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.14 POPULATION & HOUSING

3.14.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant impact on housing and population if it results in any of the following:

- A substantial growth in the unplanned population within an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of new homes or infrastructure) related to a project; or,
- The displacement of a substantial number of existing people or housing units, necessitating the construction of replacement housing.

3.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of new homes or infrastructure related to a project)?* • *No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:⁸⁰

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently undeveloped; however, the site was occupied by a previous industrial use until 1995. In addition, the site is located in the midst of an urban area.
- *Extension of roadways and other transportation facilities.* The project will utilize the existing roadways, driveways, and sidewalks.
- *Extension of infrastructure and other improvements.* The project will utilize the existing infrastructure, though new utility lines (water line) will be installed. The installation of these new utility lines will not lead to subsequent development.
- *Major off-site public projects (treatment plants, etc.).* The project is a proposal to construct a warehouse. The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere.* The site is undeveloped and there are no housing units located on-site.
- *Additional population growth leading to increased demand for goods and services.* The project will not lead to any direct increase in the City's population since no housing will be provided.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize existing roadways and infrastructure. The new utility lines that will be provided will not extend into undeveloped areas and will not result in unplanned growth. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Los Angeles is projected to add a total of 472,700 jobs through the year 2040.⁸¹ The employment increase of 32 persons that will result from the completion of the proposed project is well within SCAG's growth forecast for the City of 472,700 jobs. As a result, no growth-inducing impacts will result from the proposed project's implementation.

⁸⁰ § 15126.2(d) – Consideration and Discussion of Significant Environmental Impacts of the CEQA Guidelines

⁸¹ Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040*. Adopted on April 7, 2016.

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.*

No housing units will be displaced as a result of the proposed project's implementation and no impacts will occur.

3.14.3 MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.15 PUBLIC SERVICES

3.15.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- A substantial adverse physical impact associated with the provision of 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 relative to *fire protection services*;
- A substantial adverse physical impact associated with the provision of 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 relative to *police protection services*;
- A substantial adverse physical impact associated with the provision of 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 relative to *school services*; or,
- A substantial adverse physical impact associated with the provision of 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 relative to other *public facilities*.

3.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in substantial adverse physical impacts associated with the provision of 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 relative to fire protection services? • Less than Significant Impact.*

The Los Angeles Fire Department (LAFD) provides fire protection service for the community of El Sereno. The LAFD's 3,246 uniformed fire personnel are directly involved in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service throughout the City. The Department also has 353 non-sworn professional support personnel that provide technical and administrative support. A total of 1,018 uniformed firefighters (including 270 serving as firefighters/paramedics), are always on duty at fire department facilities citywide, including 106 neighborhood fire stations strategically located across the Department's 471 square-mile jurisdiction.⁸² LAFD Station 16 is the nearest first response station to the project site. This fire station is located 0.21 miles to the north of the project site on Eastern Avenue.⁸³ The proposed project will undergo review by the City of Los Angeles Fire Department to ensure that the site and building design meet all applicable requirements of the Department. The proposed project would not place additional demands on fire services since the project will involve the construction of modern structures that will be subject to all pertinent fire and building codes. As a result, the potential impacts will be less than significant.

- B. *Would the project result in substantial adverse physical impacts associated with the provision of 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 relative to police protection services? • No Impact.*

The City of Los Angeles Police Department provides law enforcement services throughout the City. Currently, the police department is comprised of 10,000 sworn officers and 3,000 civilian employees.⁸⁴ The closest first response station to the project site is the Hollenbeck Community Police Station located 2.24 miles to the southwest. The Hollenbeck Community Police Department serves the communities of Aliso Village, Boyle Heights, El Sereno, Estrada Court, Hermon, Hillside Village, Lincoln Heights, Montecito Heights, Monterey Hills, Pico Gardens, Ramona Gardens, Rose Hills Courts, and University Hills.⁸⁵ The proposed project will involve the construction of a warehouse designed to store evidence and police vehicles/equipment. Forms of security include a state-of-the-art network of security cameras on the exterior and interior of the structure. These cameras will deter potential illegal activity and loitering to ensure employee and neighborhood safety. Sufficient lighting will also be provided.

⁸² Los Angeles Fire Department. *Our Mission*. <https://www.lafd.org/about/about-lafd/our-mission>

⁸³ Google Earth. Site accessed May 29, 2018.

⁸⁴ Los Angeles Police Department. *Office of the Chief of Police*. http://www.lapdonline.org/inside_the_lapd/content_basic_view/834

⁸⁵ Los Angeles Police Department. *Hollenbeck Community Police Station*. http://www.lapdonline.org/hollenbeck_community_police_station

Access to the project site will be controlled by gates at every ingress/egress point. The inclusion of the aforementioned features will deter criminal activity. In addition, the facility will be occupied by the LAPD. The construction of additional space for the LAPD may be beneficial in that it could alleviate stress on police resources. As a result, no impacts will result.

C. Would the project result in substantial adverse physical impacts associated with the provision of 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 relative to school services? • No Impact.

The proposed project will not involve any development and/or uses that could potentially affect school enrollments. Moreover, the project Applicant will be required to pay mandatory development fees to the local school districts. As a result, no impacts on schools will result.

D. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in other governmental services? • Less than Significant Impact.

No new governmental services will be needed, and the proposed project is not expected to have any impact on existing governmental services. The proposed project will not directly increase demand for governmental services. As a result, less than significant impacts are anticipated.

3.15.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impact on public services. As a result, no mitigation is required.

3.16 RECREATION

3.16.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on the environment if it results in any of the following:

- 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; or,
- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

3.16.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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?* • No Impact.

The City of Los Angeles Parks and Recreation Department operates multiple parks and recreation facilities throughout the City. The nearest park is City Terrace Park, which is located 0.79 miles to the southeast of the project site.⁸⁶ Due to the nature of the proposed project (LAPD evidence warehouse), no increase in the usage of parks and recreational facilities is anticipated to occur. As a result, no impacts will occur.

B. *Would 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 proposed project will not result in a direct demand for park facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated and no impacts are anticipated. In addition, no recreational facilities are included with this project. Therefore, no impacts will result.

3.16.3 MITIGATION MEASURES

The analysis determined that the proposed project would not result in any significant impact on recreational facilities and services. As a result, no mitigation is required.

3.17 TRANSPORTATION & CIRCULATION

3.17.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may have a significant adverse impact on traffic and circulation if it results in any of the following:

- A conflict with a plan, ordinance, or policy establishing measures for addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths;
- A conflict or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(1) for a land use project;
- A conflict with or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(2) for a transportation project;
- Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or,

⁸⁶ Google Earth. Site accessed May 29, 2018.

- Results in inadequate emergency access.

3.17.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a conflict with a plan, ordinance, or policy establishing measures of effectiveness addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths? • Less than Significant Impact.*

As indicated previously, the project will employ a total of 32 people. In addition, up to three small trucks will visit the site on a daily basis and large semi-trucks will travel to the site two to three times per week. The project will permit the long-term storage of LAPD fleet vehicles. These vehicles will remain on-site and will not travel to and from the site on a daily basis, which reduces the overall number of daily trips. It is estimated that the project will generate approximately 67 daily trips (two trips per employee plus three daily small truck trips), seven trips of which will occur during the morning peak hour and seven trips of which will occur during the evening peak hour (this assumes that 10 percent of the project's daily trips occur during the morning and evening peak hours). According to the Los Angeles Department of Transportation, a technical memorandum is required when the Development Project is likely to add 25 to 42 a.m. or p.m. peak hour vehicle trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F.⁸⁷ The proposed project will result in approximately seven morning and evening peak hour trips. In addition, the intersection of Marianna Avenue and Worth Street is not operating at a LOS E or F.⁸⁸ The additional seven morning and evening peak hour trips will not degrade the level of service for the intersection of Marianna Avenue and Worth Street. As a result, the potential impacts are considered to be less than significant.

- B. *For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • Less than Significant Impact.*

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

The proposed project is a request to construct an approximately 80,000 square feet evidence warehouse. It is important to note that the project is an "infill" development. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC).⁸⁹ Infill development reduces VMT by recycling existing undeveloped or

⁸⁷ LADOT. *Transportation Impact Study Guidelines*. December 2016.

⁸⁸ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on May 17, 2018.

⁸⁹ California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council's member agencies.

underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant.

C. For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • Less than Significant Impact.

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

The proposed project is a request to construct an approximately 80,000 square feet evidence warehouse. It is important to note that the project is an “infill” development. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).⁹⁰ Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant.

D. 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)? • Less than Significant Impact.

A total of 237 parking spaces will be provided. Of the total number of spaces that will be provided, 16 will be located south of the warehouse building, 20 spaces will be located within the warehouse, and 201 spaces will be located on the roof. A ramp leading up to the rooftop parking area will be installed along the northeast corner of the building. The Applicant will also provide three dock high doors. Access to the proposed project will be provided by two driveway connections located along the north side of Worth Street. The driveways will provide access to the visitor parking area, the LAPD employee parking area, and main warehouse. A third driveway will function as a fire access lane. This fire access lane will extend along the building’s northern and western sides. The fire access lane will provide reciprocal access between the project and the future buildings that will be erected north of the evidence

⁹⁰ California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies.

warehouse. As a result, less than significant impacts are expected to occur.

E. Would the project result in inadequate emergency access? • No Impact.

The project would not affect emergency access to any adjacent parcels. At no time will any local streets or parcels be closed to traffic. As a result, the proposed project's implementation will not result in any impacts.

3.17.3 MITIGATION MEASURES

The analysis determined that no significant traffic and circulation impacts would result from the proposed project's implementation. As a result, no mitigation is required.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- A substantial adverse change in the significance of a tribal cultural resources, 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); or,
- A substantial adverse change in the significance of a tribal cultural resources, 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.

3.18.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

The project site is located within the cultural area that was formerly occupied by the Gabrieleño-Kizh. The project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts will be encountered. The grading and excavation will involve the installation of the new building footings and utility connections. In addition, the project area is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials. Nevertheless, the project Applicant will be required to adhere to the standard condition outlined in subsection 3.5.2.B. Therefore, the impacts to tribal cultural resources are considered to be less than significant.

B. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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? • Less than Significant Impact.

As previously mentioned, the project site is located within the cultural area that was formally occupied by the Gabrielino-Kizh and it was determined that the site may be situated in an area of high archaeological significance. The project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts will be encountered. Nevertheless, the project Applicant will be required to adhere to the standard condition outlined in subsection 3.5.2.B. Therefore, the impacts to tribal cultural resources are considered to be less than significant.

3.18.3 MITIGATION MEASURES

The analysis of tribal cultural resources indicated that no significant impacts would result with the implementation of the proposed project. As a result, no mitigation is required.

3.19 UTILITIES & SERVICE SYSTEMS

3.19.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts;
- Insufficient water supplies to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years;
- A determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand;
- The generation of solid waste in excess of State or local standards or in excess of the capacity of local infrastructure;
- A negative impact on the provision of solid waste services or impair the attainment of solid waste reduction goals; or,
- Compliance with Federal, State, and local management and reduction statutes and regulations related to solid waste.

3.19.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts? • Less than Significant Impact.

The project site is presently undeveloped. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for waste disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). As a result, the potential impacts are considered to be less than significant.

B. *Would the project have sufficient water supplies available to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years? • Less than Significant Impact.*

The City of Los Angeles is served by the Los Angeles Department of Water and Power, which covers a 469 square mile area and provides over 3.9 million residents with water. Water distributed by the Los Angeles Department of Water and Power (LADWP) is sourced by the Los Angeles Aqueduct, local groundwater, recycled water, and water purchased from the Metropolitan Water District.⁹¹ The project is expected to consume approximately 1,920 gallons of water per day (refer to Table 3-6).

**Table 3-6
 Water Consumption (gals/day)**

| Use | Unit | Factor | Generation |
|---------------------------|----------------|------------------------------|----------------|
| Warehousing and mezzanine | 80,000 sq. ft. | 24 gallons/1,000 sq. ft./day | 1,920 gals/day |
| Total | 80,000 sq. ft. | | 1,920 gals/day |

Source: City of Los Angeles CEQA Thresholds Guide

According to the 2015 Urban Water Management Plan, the total amount of available water is projected to be 642,400 acre-feet. Demand is projected to equal supplies by 2020.⁹² However, the Mayor introduced a plan to reduce demand to 485,600 acre-feet by 2020. The Mayor’s plan to reduce citywide demand for water was created in response to the prolonged drought that affected the State over the past six years. The LAPD evidence warehouse will be equipped with water efficient fixtures and drought tolerant landscaping will be planted throughout the project site.

The project will also require the extension of an off-site water line to the project site. The extension of the line will serve the entire 6.6-acre site (recall that this larger 6.6-acre site will be subdivided and the LAPD evidence warehouse project will be located on a 2.94-acre parcel. The site is not currently served by the Los Angeles Department of Water and Power and no City-owned water line connections exist in the immediate area. The project cannot connect to the water lines located to the south of the site since these lines serve the unincorporated portions of Los Angeles County. Therefore, a water line from the north will be extended to the project site. The extension of a City water line will necessitate the closure of a lane along Marianna Avenue to accommodate the trenching. The extension of the water line will also include the installation of two lateral lines (one for each parcel). The lateral line that will serve the project may connect to the northeast corner of the building, just south of the driveway that provides access to the roof. The existing water supply facilities and infrastructure will be able accommodate this additional demand. As a result, the impacts are considered to be less than significant.

⁹¹ Los Angeles Department of Water and Power. *2015 Urban Water Management Plan*.
<https://www.ladwp.com/ladwp/faces/ladwp/aboutus>

⁹² Ibid.

C. *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? • Less than Significant Impact.*

The City operates more than 6,700 miles of public sewers that convey about 400 million gallons per day (MGD) of flow from residences and businesses to the City's four wastewater treatment and water reclamation plants. The community of El Sereno is located within the service boundaries of the Hyperion Treatment Plant. The Hyperion Water Reclamation Plant is the City's oldest and largest wastewater treatment facility. The plant has been operating since 1894. The plant has been expanded and improved numerous times over the last 100 plus years. On average 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day.⁹³

Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (MGD) and peak wet weather flow of 800 MGD. The Hyperion Water Reclamation Plant provides primary and secondary treatment.⁹⁴ Table 3-7 indicates the future wastewater generation in gallons per day. According to Table 3-7, the proposed project is expected to generate approximately 1,600 gallons of sewage per day, which is well within the daily average totals for the Hyperion Water Reclamation Plant.

**Table 3-7
 Wastewater (Effluent) Generation (gals/day)**

| Use | Unit | Factor | Generation |
|---------------------------|----------------|------------------------------|----------------|
| Warehousing and mezzanine | 80,000 sq. ft. | 20 gallons/1,000 sq. ft./day | 1,600 gals/day |
| Total | 80,000 sq. ft. | | 1,600 gals/day |

Source: City of Los Angeles CEQA Thresholds Guide

The proposed project will connect to an existing eight inch sewer line located within Worth Street. Adequate sewage collection and treatment are currently available. In addition, the new plumbing fixtures that will be installed will consist of water conserving fixtures as is required by the current City Code requirements, no new or expanded sewage and/or water treatment facilities will be required to accommodate the proposed project; as a result, the impacts are expected to be less than significant.

D. *Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure? • Less than Significant Impact.*

Waste hauling services are provided by the Los Angeles Bureau of Sanitation. Waste collected by the Los Angeles Bureau of Sanitation is taken to the Central Los Angeles Recycling and Transfer Station (CLARTS). The CLARTS has a present capacity of 2,500 tons per day and a permitted capacity 4,025

⁹³ City of Los Angeles, Sanitation Department. *Hyperion Water Reclamation Plant*. <https://www.lacitysan.org/san/faces/home/portal>

⁹⁴ Ibid.

tons per day. The CLARTS has a remaining capacity of 1,525 tons per day.⁹⁵ According to screening criteria used by the City of Los Angeles Planning Department, a project will potentially have a significant impact on solid waste generation if it generates in excess of five tons of solid waste per day. The project is anticipated to generate approximately 438 pounds of solid waste per day. This increase of 438 pounds per day is within the remaining capacity of the CLARTS. As a result, the potential impacts are considered to be less than significant.

E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? • No Impact.

The proposed project, like all other development in Los Angeles, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.

The proposed project, like all other development in Los Angeles, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

3.19.3 MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRES

3.20.1 THRESHOLDS OF SIGNIFICANCE

According to the City of Los Angeles, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following located in or near State responsibility areas or lands classified as very high fire hazard severity zones:

- Impairment of an adopted emergency response plan or emergency evacuation plan;
 - Due to slope, prevailing winds, and other factors, exacerbation of wildfire risks, and thereby exposure to project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
 - The requirement of 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;
- or,

⁹⁵ City of Los Angeles, Sanitation Department. *CLARTS Facts & Services* <https://www.lacitsan.org/san/faces/home/portal>.

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

3.20.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

The area surrounding the project site is urban and there are no areas containing natural vegetation that could lead to a wildfire.⁹⁶ Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. As a result, no impacts will occur.

- 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? • Less than Significant Impact.*

The project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project area. The project site is located outside of the City's fire hazard severity zone, or any areas where there is natural vegetation that may represent a significant wildfire risk.⁹⁷ The proposed project may be exposed to criteria pollutant emissions generated by wildland fires due to the project site's proximity to the San Gabriel Mountains. However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, the potential impacts are considered to be less than significant.

- 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.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. As indicated previously, the project site is located outside of a fire hazard severity zone. As a result, no impacts will occur.

- D. *Would the project expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the project site and surrounding areas are developed and are covered over in pavement and concrete. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no will occur. The project will include the installation of an 11 foot high

⁹⁶ CalFire. *SRA Map for Los Angeles County*. http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf

⁹⁷ ZIMAS and CalFire. *SRA Map for Los Angeles County*. http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf

retaining wall along the site's northern boundary and a nine foot high retaining wall along the site's eastern boundary. As a result, no impacts will occur.

3.20.3 MITIGATION MEASURES

The analysis of wildfires impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- *The approval and subsequent implementation of the proposed project will not have the potential to degrade the quality of the environment.* The proposed project will not have the potential to degrade the quality of the environment since the project's air quality emissions will be below the thresholds of significance outlined by the SCAQMD. No impacts to protected species or habitat will result with the implementation of the proposed project. Furthermore, the best management practices identified in the preliminary LID will filter out contaminants of concern present in stormwater runoff. The addition of project trips will not negatively impact any local intersection.
- *The approval and subsequent implementation of the proposed project will not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.* The proposed project is an infill development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC). Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas.
- *The approval and subsequent implementation of the proposed project will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.* There are no cumulative projects located within one-mile of the project site. In addition, the project's traffic and air emissions will not be significant enough to exacerbate an existing citywide problem.
- *The approval and subsequent implementation of the proposed project will not have environmental effects that will adversely affect humans, either directly or indirectly.* Due to the nature of the proposed project (an evidence warehouse for the LAPD), biological waste maybe generated as part of the daily operations. This waste will be properly secured and disposed of into bio-hazard disposal bins. In addition, the project will include emergency eyewash stations and specialized lockers for securing hazardous and biological materials.

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts, with the implementation of the mitigation measure. The following findings can be made regarding the mandatory findings of significance set forth in Section 15065 of the CEQA Guidelines based on the results of this initial study:

- The proposed project *will not* have the potential to degrade the quality of the environment.
- The proposed project *will not* have the potential to achieve short term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration, which relates to the Mitigation Monitoring Program. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB 3180 and in compliance with the requirements of the Public Resources Code. A Mitigation Reporting and Monitoring Program will not be required.

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SECTION 5 REFERENCES

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