

# I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Prologis Vermont and Redondo Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section are the following: an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

## 1. Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effect, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be, significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines, which discusses determining the significance of the environmental effects caused by a project.

## 2. Draft EIR Focus and Effects Found Not to be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project, and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on February 7, 2020 for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendices A and B of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (paleontological resources)
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation
- Tribal Cultural Resources

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic vistas, scenic highways, agricultural and forestry resources, biological resources, historical resources, fault rupture, seismic ground shaking, seismic ground failure, landslides, soil erosion and loss of topsoil, unstable soils, expansive soil, the ability of soils to support the use of septic tanks, airport or airstrip-related hazards, implementation of an adopted emergency response plan or emergency evacuation plan, wildland fires, groundwater recharge, flood hazards, land use, mineral resources, airport or airstrip-related noise, population and housing, public services, recreation, utilities and service systems, and wildfire. Therefore, these areas were not further analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR. However, some topics that were determined to be less than significant in the Initial Study were further addressed in this Draft EIR to provide additional Project information such as light and glare, analysis from the Hydrology and Low Impact Development technical reports (see Appendices G1 and G2), and to address recent Caltrans guidance related to geometric design features in transportation.

### 3. Draft EIR Organization

The Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. **Project Description.** This section provides a description of the Project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section provides a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.

- IV. Environmental Impact Analysis.** This section contains the environmental setting, project design features (where applicable), Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; noise; transportation; and tribal cultural resources.
- V. Alternatives to the Project.** This section provides an analysis of a reasonable range of alternatives to the Project, including the No Project/No Build Alternative, Existing Zoning Alternative, and Reduced Project Alternative.
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the reference and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A-Initial Study
- Appendix B-NOP and NOP Comments
- Appendix C-Air Quality and Greenhouse Gas Emissions Technical Modeling
- Appendix D-Cultural and Paleontological Resources Assessment Report
- Appendix E-Geotechnical Investigation
- Appendix F-Technical Appendix for Hazards and Hazardous Materials
  - Appendix F1-Phase I Environmental Site Assessment
  - Appendix F2-Phase II Soil and Soil Vapor Investigation Report,

- Appendix F3-Soil Management Plan
- Appendix F4-Response to SWAPE Letter Comments
- Appendix F5-LARWQCB approved Workplan
- Appendix G-Technical Appendix for Hydrology and Water Quality
  - Appendix G1-Preliminary Hydrology Calculations
  - Appendix G2-Low Impact Development
- Appendix H-Noise Appendices
- Appendix J-Consistency Analysis with Citywide Urban Design Guidelines
- Appendix I-Transportation Assessment Report
  - Appendix I1-Transportation Assessment Report (TAR)
  - Appendix I2-Trip Generation and VMT Forecast-Existing Zoning Alternative
  - Appendix I3-Final Assessment Letter on TAR

## 4. Existing Project Site Conditions

The Project Site is currently unoccupied (see Figure II-2, Aerial Photograph), surrounded by a chain link fence with three large concrete slab foundations, which are the remains of former manufacturing facilities: Virco Manufacturing, Inc. (Virco) on the western half and Pacific Electriccord Company (Electriccord) and Leviton on the eastern half of the property. Most of the areas surrounding the slabs are paved with asphalt and concrete in poor condition. Additionally, a former gas station was located at the southwestern corner of the property until it was demolished in approximately 1994. The previously mentioned manufacturing facilities, which comprised approximately 505,000 square feet, were demolished in 2010 and 2011.

According to the current General Plan land use designation, the Project Site is located within planning boundaries of the Harbor Gateway Community Plan area, which designated the property for Light Manufacturing land uses with corresponding zones of M2 (Light Industrial Zone), MR2 (Restricted Light Industrial Zone), and P (Parking Zone). The Project Site is zoned M2-1VL-O (Light Industrial Zone – Height District 1 Very Limited – Oil Drilling District).

## 5. Description of the Proposed Project

The Project involves the construction and operation of 340,298 square feet (including a 25,000square foot mezzanine) of industrial uses, consisting of a warehouse/manufacturing/high-cube warehouse/distribution center with up to 40,000 square feet of office, within a one-story, 53-foot tall building in lieu of the otherwise permitted 45 feet. The Project incorporates all conditions of approval and design recommendations that were imposed by the City of Los Angeles City Planning Commission approval of a previously proposed project on March 16, 2018. The Project requires approval of two conditional use permits (CUP), including a Major Development CUP and a Corner Development CUP; site plan review; and zoning administrator's adjustment.

The Project includes a total of 194 automobile surface parking spaces, 32 bicycle parking spaces, 36 dock high truck loading positions, and up to 71 parking stalls for truck trailers. All loading and unloading would be located within a fully-screened yard at the rear (north side) of the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks. Additionally, landscaping at the northern end of both Vermont Avenue and Orchard Avenue would provide additional screening. For Vermont Avenue, the landscaping would occur along the property line, extending approximately 235 feet east to the screened yard, and, for Orchard Avenue, it would occur adjacent to the proposed water basin (shown on the northeastern corner of Figure II-4, Site Plan). The railroad would separate the proposed building from existing uses to the north of the Project Site, including the baseball fields and residential units. The loading docks would be oriented on the north side of the building where the nearest sensitive receptors to the north would be shielded by a proposed 14-foot high concrete sound wall. Additional 14-foot high concrete walls are proposed immediately north, east and west of the loading area.

All unimproved sidewalk areas adjacent to the Project Site would be improved by meeting the City of Los Angeles Bureau of Engineering's (LABOE) requirements for street widening and sidewalk requirements. The Project would be required to provide dedications and improvements along all three street frontages, including reconstructing damaged sidewalks.

Demolition of the numerous existing structures, which are remnants of previous buildings, would be required in order to facilitate construction of the new building. Demolition of these structures and associated improvements would include all foundations, floor slabs, utilities, and any other subsurface improvements that would not remain in place for use with the new development. The building would be located in the south-central area of the Project Site with loading docks along the northern building wall. The building would be surrounded by concrete pavements for the parking, drive aisles, and loading dock area. Several landscape planters and concrete flatwork would be included throughout the Project Site.

The Project is consistent with the existing general plan and zoning designations for Light Manufacturing land uses. While the Project Site is located within the South Los Angeles Alcohol Sales Specific Plan, the policies contained therein are not relevant to the development of the proposed Project since it would not be used for the sale of alcoholic beverages. Permitted uses include warehousing, manufacturing, high-cube warehouse distribution, or transload/short-term storage. Fulfillment center and cold storage warehouse would not be allowed with the requested Project approval as it is a restricted use under the conditions of approval adopted for the previous project that is currently being reconsidered on appeal.

The Project includes 71 tractor trailer parking stalls and would provide conduit infrastructure for future electric vehicle (EV) charging stations for 6 of these tractor trailer stalls. The Project would also provide a rooftop solar installation or other renewable energy power system to offset the expected electrical consumption of the tenant. Additionally, the proposed Project would provide 73,583 square feet of native landscaping, including approximately 165 trees.

Refer to Section II, Project Description, of this Draft EIR for a detailed description of the Project and the requested permits and approvals.

## 6. Areas of Controversy

Based on the NOP comment letters provided in Appendix B of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with aesthetics, air quality, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, and transportation. Refer to Appendix B for copies of the NOP comment letters.

## 7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on February 7, 2020, for a 30-day review period. In addition, a public scoping meeting for the Project was held on February 19, 2020. The Initial Study, NOP, and NOP comment letters are included in Appendices A and B of this Draft EIR.

The Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

## 8. Summary of the Environmental Impacts

Table I-1 of page I-6 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts relative to: air quality (regional operational emissions). Cumulative impacts associated with regional air quality impacts during operation would also be significant and unavoidable.

**Table I-1  
Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>A. Aesthetics</b>	
Scenic Vistas	No Impact
Scenic Highway	No Impact
Scenic Quality	Less than Significant
Light or Glare	Less than Significant
<b>B. Air Quality</b>	
Construction	
Regional Emissions	Less than Significant with Mitigation
Localized Emissions	Less than Significant
Toxic Air Contaminants	Less than Significant
Operation	

**Table I-1  
Summary of Impacts Under the Project**

<b>Environmental Issue</b>	<b>Proposed Project Impact</b>
Regional Emissions <sup>1</sup>	<b>Significant and Unavoidable</b>
Localized Emissions	Less than Significant
Toxic Air Contaminants	Less than Significant
Odor	
Construction	Less than Significant
Operation	Less than Significant with Mitigation
<b>C. Cultural Resources</b>	
Historical Resources	No Impact
Archeological Resources	Less than Significant
Human Remains	Less than Significant
<b>D. Energy</b>	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less than Significant
Operation	Less than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less than Significant
<b>E. Geology and Soils</b>	
Geology and Soils	Less than Significant
Paleontological Resources	Less than Significant
<b>F. Greenhouse Gas Emissions</b>	
	Less than Significant
<b>G. Hazards and Hazardous Materials</b>	
Construction	Less than Significant
Operation	Less than Significant
<b>H. Hydrology and Water Quality</b>	
Surface Water Quality	
Construction	Less than Significant
Operation	Less than Significant
Groundwater Quality	
Construction	Less than Significant
Operation	Less than Significant
Surface Water Hydrology	
Construction	Less than Significant
Operation	Less than Significant
Groundwater Hydrology	
Construction	Less than Significant

<sup>1</sup> As discussed in Section IV.B, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during operation would be significant and unavoidable.

**Table I-1  
Summary of Impacts Under the Project**

<b>Environmental Issue</b>	<b>Proposed Project Impact</b>
Operation	Less than Significant
<b>I. Noise</b>	
Construction	
On-site Noise	Less than Significant
Off-Site Noise	Less than Significant
Vibration	Less than Significant
Operation	
On-site Noise	Less than Significant
Off-Site Traffic Noise	Less than Significant
Vibration	Less than Significant
<b>J. Transportation</b>	
Conflict with Plans	Less than Significant
Vehicle Miles Traveled	Less than Significant
Hazardous Design Features	Less than Significant
Emergency Access	Less than Significant
<b>K. Tribal Cultural Resources</b>	
	Less than Significant

## 9. Project Design Features

The following project design features would be implemented as part of the Project:

### a. Aesthetics

**AES-PDF-1:** Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity from view at the street level.

**AES-PDF-2:** Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from the above. However, construction lighting will not be so limited as to compromise the safety of construction workers.

**AES-PDF-3:** Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning (HVAC) systems), as well as building appurtenances, and trash enclosures, will be integrated into the Project's architectural design.

**AES-PDF-4:** All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project Site such that the light source does not Project directly upon any adjacent property.

**AES-PDF-5:** Glass used in building facades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare by minimizing the use of glass with



mirror coating. Consistent with applicable energy and building code requirements, glass with coatings required to meet the 2019 Building Energy Efficiency Standards will be permitted.

## **b. Air Quality**

- AQ-PDF-1:** The Project will install a minimum of 20 electric vehicle charging stations for electric passenger vehicles with an additional 38 stalls capable of supporting future electric vehicle chargers will be installed on-site.
- AQ-PDF-2:** The Project will include at least six tractor trailer parking stalls capable of supporting future electric vehicle supply equipment.
- AQ-PDF-3:** The Project will install a solar photovoltaic (PV) system that will generate a minimum of 460,000 kilowatt-hours per year (kWh/yr) of renewable electricity.
- AQ-PDF-4:** The proposed building will be designed and built to meet the standard for LEED Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program.
- AQ-PDF-5:** All forklifts used on-site will be electric-powered.
- AQ-PDF-6:** The Project will install a roof with a Solar Reflectance Index (SRI) of 25 or better to reduce surface temperature, heat island effect, and heat transfer to the interior of the structure.

## **c. Hazards and Hazardous Materials**

- HAZ-PDF-1:** The Project will implement the requirements of a Soil Management Plan (SMP) (see Appendix F3) during soil moving activities, which includes explicit instructions for the appropriate handling, storage and disposal of any known or potentially impacted soil. The general contractor will be required to follow the requirements of the SMP and stop work to make notification to the environmental team if any potential impacts are observed at any time the environmental team is not already on-site. The SMP also requires air monitoring activities to monitor the air downwind of the Project Site and appropriate Health and Safety Plans that will be employed by site workers. The SMP identifies requirements intended to protect human health when soil in certain areas of known or suspected impacts are disturbed for any reason, including, but not limited to, those resulting from demolition, utility installation/repair, soil excavation, drilling, grading/filling activities, stockpile generation, soil management, loading, and transportation. Requirements of the SMP include:

- **Health and Safety Plan (HASP):** A HASP will be prepared and in effect for all activities associated with the SMP and other activities

at the Project Site. Contractors working on site are expected to be operating under their own health and safety plans.

- **Environmental Monitoring:** In accordance with South Coast Air Quality Management District (SCAQMD) Rules, air monitoring will be necessary in areas where potential volatile organic compounds (VOC) contaminated soil are to be disturbed. Air monitoring for dust may also be required in other areas. An air monitoring/health and safety professional will be present during relevant activities and responsibilities will include recording monitoring data on field sheets, which will be kept as part of Project documentation.
- **Soil Monitoring:** Soils impacted by VOC or total petroleum hydrocarbons (TPH) that are encountered during site redevelopment will be characterized and documented. The monitoring and sampling activities to be performed include:
  - Visual observation performed to detect areas of soil that may be impacted by TPH or other non-VOC hazardous materials, if encountered.
  - Screening for VOCs using field instruments to document new or previously undetected sources of VOCs.
  - Soil sampling and chemical testing performed to evaluate concentrations of VOCs and TPH.
- **Proper Soil Handling:** If impacted soil is encountered, the area will be delineated as necessary with cones, caution tape, stakes, chalk, or flagging and the area will not be disturbed further until an environmental professional is on-site for observation and determination of whether testing and/or excavation work is required. Stockpile staging areas will be delineated prior to the start of excavation. All excavations will conform to applicable regulations, including the California Division of Occupational Safety and Health (better known as Cal/OSHA) Construction Safety Orders. The specific equipment, means, and methods to be utilized for soil removal, handling, and disposition will be selected based on the nature of the work to be conducted and its location on the site. If excavation is conducted during the rainy season (October through April), provisions will need to be made to prevent off-site migration of sediment in runoff.

- **Fugitive Dust and Vapor Control:** Appropriate procedures will be implemented to control the generation of airborne dust by soil removal activities, including, but not limited to, the use of water as a dust suppressant or stopping activities that have the potential to generate fugitive dust in the event wind conditions change creating an uncontrollable condition.
- **Excavation and Stockpiling:** Impacted soil that is excavated and not immediately removed from the site will be stockpiled on site and covered with plastic sheeting to control dust and minimize exposure to precipitation and wind. If a stockpile remains on site during the rainy season, a perimeter sediment barrier, constructed of material such as straw bales or fiber roll, will also be installed. The stockpiles will be inspected biweekly at a minimum. During stockpile removal, only the working face of the stockpile will be uncovered. If the stockpiled impacted soil is to be transported off-site for disposal or recycling, the soil will be profiled for waste characteristics. Soil samples will be analyzed for parameters required by the disposal/recycling facility.
- **Responding to Unknown Conditions:** If previously unknown impacted soil is suspected (based on visual staining, odors, photo ionization detector readings, or other observations), the area will be delineated and construction activity will cease in this area and sampling of the unknown material will occur using USEPA methodology. Analysis will be conducted for TPH, metals, and/or VOCs, as appropriate. Analytical results will be compared to applicable regulatory screening levels. Based on this comparison, a determination will be made regarding soil disposition (reuse on site, off-site transport, and disposal/recycling, etc.). Additionally, if any underground storage tanks (UST) or other subsurface features are encountered, a similar approach will be taken, and appropriate permitting, as necessary, will be obtained for the removal of the feature(s). Any permitted removals will be conducted with appropriate regulatory oversight, documentation, and reporting.
- **Imported fill:** As appropriate, off-site soils brought to the site for use as backfill (import fill), if necessary, will be tested in general conformance with the California Department of Toxic Substances Control (DTSC) Information Advisory Clean Imported Fill Material document.

- **Post-construction Requirements:** If contaminated soil is left in place, the location of this soil will be surveyed or recorded by use of geographic positioning system equipment. Following the completion of construction, excavation, and disposition activities, a summary report will be prepared. The report will include a summary of activities, locations of soil sources and final disposition of contaminated soil, and estimated quantities of materials. Additionally, removal of any USTs or other subsurface features, if encountered, will be conducted under appropriate permits (if any) and documented in applicable reports for submittal to the Los Angeles Fire Department (LAFD), or other regulatory agency, as appropriate.

**HAZ-PDF-2:** The proposed Project will include installation of a vapor intrusion mitigation system (VIMS). The VIMS will be installed beneath the proposed building during construction to protect it from any potential for vapor intrusion. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. The passive venting system will allow potential vapors beneath the structure to be conveyed through piping to various points outside of the building. The passive venting system will have the potential to be turned into an active system, should it ever be deemed necessary during the lifetime of the structure.

#### d. Noise

- N-PDF-1:** **Docks.** The Project will be limited to no more than 36 dock high truck loading positions.
- N-PDF-2 :** **Construction-source noise.** All construction equipment that is required to be equipped with a backup alarm will utilize a broadband-style backup alarm.
- N-PDF-3:** **Operational-source noise.** Back-up beepers will not be allowed; alternate safety means for exterior operated vehicles will be utilized between the hours of 10:00 p.m. and 7:00 a.m.
- N-PDF-4:** **Operational-source noise.** Loading and unloading will be prohibited within 300 feet of any existing residential building between the hours of 10:00 p.m. and 7:00 a.m. the following day.
- N-PDF-5:** **Operational-source noise:** The Project will include a minimum 14-foot tall concrete masonry unit (CMU) or concrete wall along the northern property line to shield surrounding uses from noise relating to loading dock activities.

**N-PDF-6: Increased Noise Levels (Demolition, Grading, and Construction Activities).**

- a. Construction and demolition will be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday.
- b. Demolition and construction activities will be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- c. The contractor will use power construction equipment with muffling devices.
- d. The contractor will use on-site electrical sources or solar generators to power equipment rather than diesel generators where feasible.
- e. The contractor will erect a temporary construction noise barrier 10-feet in height along the entire northern property line of the Project Site for the duration of construction activities. The barrier may be constructed with 1-inch plywood but will be solid, without holes or cracks, and will extend to the ground surface.
- f. During all excavation and grading on-site, construction contractors will equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
- g. The contractor will place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project Site.
- h. Equipment will be shut off and not left to idle when not in use.
- i. The contractor will locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project Site during all project construction.
- j. Jackhammers, pneumatic equipment and all other portable stationary noise sources will be shielded and noise will be directed away from sensitive receptors.
- k. A construction monitoring program will be prepared in order to document the decrease in noise levels obtained by the above listed construction measures.

## e. Transportation

**T-PDF-1: Loading.** All loading and unloading at the Project Site would occur at the rear of the building, along the north side of the Project Site adjacent to the Union Pacific right-of-way and out of sight from public sidewalks. A 14-foot sound wall will be constructed along the northerly property boundary to further screen the on-site loading activities from the existing uses north of the site. Truck access to the loading area will be accommodated by the Vermont Avenue driveway and the northerly driveway on Orchard Avenue only. The Project will be designed such that the loading activities will occur more than 300 feet from the nearest residential unit and out of view from the public right-of-way, which exceeds the requirements for vehicle loading and unloading set forth in LAMC Section 114.03

**T-PDF-2: Construction Staging and Traffic Management Plan.** Should any such pedestrian detours or temporary travel lane closures be proposed, traffic control/management plans will be prepared for the required review and approval by Los Angeles Department of Transportation (LADOT). Accordingly, the Construction Site Traffic Management Plan (CSTMP) will include, but not be limited to the following features, as appropriate:

- Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on-and-off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses;
- Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure/s to off-peak travel periods;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;
- Store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;

- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles would utilize for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations;
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods. No hauling or transport will be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets will at all times yield to public traffic;
- Construction-related parking and staging of vehicles will occur on-site to the extent possible but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The CSTMP will meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD), as well as City of Los Angeles requirements.

**T-PDF-3: Transportation Demand Management Program.** Transportation demand management (TDM) measures are aimed at reducing vehicular traffic generated at project sites and the associated need for parking. TDM measures decrease the number of vehicular trips generated by persons traveling to/from the site by offering

specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, walking, and bicycling) and ridesharing.

In order to comply with the City's Transportation Demand Management (TDM) <sup>2</sup>, a formal Preliminary TDM Plan will be developed in conjunction with LADOT prior to issuance of a building permit for the Project. This preliminary plan will include, at a minimum, measures consistent with the City's TDM Ordinance. A Final TDM Plan will be prepared prior to issuance of any building permit. The Project TDM plan could include some of the following measures:

- *TDM Information/Promotional Materials.* Provide transportation information in a highly visible and accessible location within the building, including information on local transit providers, area walking routes, bicycling maps, etc., to inform employees and visitors of available alternative transportation modes to access the Project, other amenities in the area and travel opportunities in the area. Highlight the environmental benefits of utilization of alternative transportation modes. In addition, make available transit fare media and day/month passes for purchase by employees and visitors during typical business hours.
- *Transit Welcome Package.* Provide all new employees with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. At a minimum include information regarding the employer/s' arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project.
- *Carpool Program for Employees.* Provide preferential parking within the on-site parking areas for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision.
- *Public Transit Stop Enhancements.* Work in cooperation with LADOT and other transit agencies to improve the existing bus stop

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<sup>2</sup> *City of Los Angeles Ordinance 168,700 (Transportation Demand Management and Trip Reduction Measures, effective March 31, 1993) added Section 12.26 J to the Los Angeles Municipal Code to provide transportation demand management features within new buildings which would facilitate the use of alternative transportation modes to decrease dependency on vehicles carrying only one person.*



on Vermont Avenue with a shelter and transit information. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements are intended to make riding the bus a safer and more attractive alternative.

- *Convenient Parking/Amenities for Bicycle Riders.* Consistent with LAMC requirements, provide locations at the Project Site for convenient bicycle parking for employees and visitors. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle.
- *Local Hiring Program.* When hiring conduct outreach to residents who live in the study area based on satisfaction of other requirements of the available positions.
- *Flexible/Alternative Work Schedules.* Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible.
- *Parking Cash-Out Program.* Require in any lease it executes as landlord for space within the Project that a parking cash-out program be provided if employees are charged for parking. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.

## 10. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

### a. Air Quality

**AQ-MM-1** During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 25 grams per liter or less for all interior and exterior building coatings. This mitigation measure shall be noted on all construction management plans verified by the City of Los Angeles prior to issuance of any construction permits and during coating activities.

**AQ-MM-2** During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 50 grams per liter or less for all surface parking lot striping. This mitigation measure shall be noted on all

construction management plans verified by the City of Los Angeles prior to issuance of any construction permits and during parking lot coating activities.

**AQ-MM-3** Only electric-powered off-road equipment (e.g., yard trucks/hostlers) shall be utilized on-site for daily warehouse and business operations. The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation to use only electric-powered off-road equipment shall be included all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the Project developer/facility owner and tenant/business entity shall provide to the City of Los Angeles Department of City Planning and Office of Finance a signed document (verification document) noting that the Project development/facility owner has disclosed to the tenant/business entity the requirement to use only electric-powered equipment for daily operations. This verification document shall be signed by authorized agents for the Project developer/facility owner and tenant/business entities. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the City of Los Angeles Department of City Planning and Office of Finance to verify, to the City's satisfaction, that any off-road equipment utilized will be electric-powered.

**AQ-MM-4** To reduce idling emissions from transport trucks, signage shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict non-essential idling to no more than two consecutive minutes; and (3) telephone numbers of the building facilities manager and CARB to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the City of Los Angeles Department of City Planning shall note the locations of these signs. Prior to issuance of the Certificate of Occupancy, the final construction monitoring report shall include verification that signage has been installed.

**AQ-MM-5** All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City of Los Angeles Department of City Planning to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric-powered.

**AQ-MM-6** All transport trucks utilized for daily operations shall have engines that meet the California Air Resources Board's 2010 engine emissions standards specified in California Code of Regulations, Title 13, Article 4.5, Chapter 1, Section 2025 (i.e., 0.01 gram per brake horsepower-hour (g/bhp-hr) of particulate matter and 0.20

g/bhp-hr of NO<sub>x</sub> emissions). The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the aforementioned truck/engine requirement shall be included all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the Project developer/facility owner and tenant/business entity shall provide to the City of Los Angeles Department of City Planning and Office of Finance a signed document (verification document) noting that the Project developer/facility owner has disclosed to the tenant/business entity the truck requirement for daily operations and tenant/business entity shall comply with the provisions of this mitigation measure. This verification document shall be signed by authorized agents for the Project developer/facility owner and tenant/business entities.

**AQ-MM-7** Prior to issuance of a Business License for a use that has potential to generate nuisance odors beyond the property line (see list below or as determined by the City of Los Angeles Department of City Planning), an odor management plan shall be prepared by the Project developer/facility owner and tenant/business entity and submitted to City of Los Angeles Department of City Planning and Office of Finance for review and verification. Uses that have the potential to generate nuisance odors include, but are not limited to:

- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Chemical-processing facilities
- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The odor management plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the site plan and submitted to the City of Los Angeles Department of City Planning and Office of Finance for verification.

## 11. Summary of Alternatives

This Draft EIR examined three alternatives to the Project in detail, which include the No Project/No Build Alternative, Existing Zoning Alternative, and Reduced Project Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts

of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

### **a. No Project/No Build Alternative**

In accordance with CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstances under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative A: No Project/No Build Alternative, assumes that the Project would not be approved, and no new development would occur within the Project Site. The physical conditions of the Project Site would generally remain as they are today, consisting of vacant, disturbed land. The Project Site would remain unoccupied, surrounded by a chain link fence with three large concrete slab foundations, and paved with asphalt and concrete in poor condition. No new construction would occur.

The No Project/No Build Alternative would avoid the Project's significant and unavoidable impact with respect to operational-related air quality. This alternative would also eliminate the Project's significant cumulative impact with respect to air quality. Impacts associated with aesthetics; construction-related hazards and hazardous materials; and hydrology and water quality would be greater than the Project because it would not redevelop a vacant, unattractive site, result in hazardous materials clean-up of the Project Site, or result in improvements to surface water runoff quality. Impacts associated with the remaining environmental issues would be less than those of the Project. Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to redevelop a blighted and underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy.

### **b. Existing Zoning Alternative**

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative, analyzed above, may discuss “predictable actions by others, such as some other project if disapproval of the project under consideration were to occur.” CEQA Guidelines Section 15126.6(e)(3)(B) state that “If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this “no project” consequence should be discussed . . . and the analysis should identify the practical result of the project's non-approval...” CEQA Guidelines Section 15126(e)(3)(C) further states that the No Project Alternative should project “what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services.” Based on this guidance, the Existing Zoning Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning on the Project Site.

The existing M2 zoning allows for industrial and commercial uses, which include retail uses. This alternative analyzes the construction of up to 150,000 square feet of retail uses under the M2

zoning requirements. Square footage for retail usage was determined based on a building coverage of approximately 25 percent of the net acreage of the site to allow for adequate parking.

The Existing Zoning Alternative would eliminate the Project's significant and unavoidable operational air quality impact related to the exceedance of the regional significance threshold for NO<sub>x</sub>. Air quality, GHG emissions, energy, and construction on-site noise and operational noise impacts would be less than the Project due to a shorter construction duration and a reduction the size of the building proposed under this alternative. Impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction-related off-site noise, and tribal cultural resources, would be similar to the Project, while transportation impacts would be greater under the Existing Zoning Alternative due to additional VMTs generated by the retail use.

### **c. Reduced Project Alternative**

The Reduced Project Alternative would develop the same warehouse/manufacturing/ high-cube warehouse/distribution center, but the development would be reduced by approximately 25 percent. Specifically, under this alternative, the proposed building would be reduced from 340,298 square feet to 255,224 square feet with similar improved area for parking spaces and landscaped area. Vehicular access to the Project Site would remain the same with one right-in/right-out driveway on Vermont Avenue, one right-in/right-out driveway at Redondo Beach Boulevard, and two full access driveways at Orchard Avenue. Truck access would continue to occur at Vermont Avenue and the northerly Project driveway at Orchard Avenue.

This alternative would implement a similar building design and height and implement similar lighting, signage, vehicular and pedestrian access, and sustainability features as those proposed for the Project. This alternative would require the same discretionary approvals as the Project. Due to the reduced amount of construction, the duration of construction would be less than the Project.

The Reduced Project Alternative would lessen the Project's significant and unavoidable impacts with respect to operational-related air quality but would not eliminate the Project's significant and unavoidable impact related to the exceedance of the regional significance threshold for NO<sub>x</sub>. This alternative would also lessen impacts associated with construction-related regional and localized and operational localized air quality, energy, GHG emissions, and construction related on-site and operational off-site traffic noise due to a shorter construction duration and a reduction the size of the building proposed under this alternative. Impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction related off-site and operational on-site stationary noise, transportation, and tribal cultural resources, would be similar to the Project. The Reduced Project Alternative would only partially meet the Project's underlying objectives to: Promote goods movement in a location with superior access to freeways proximate to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region; provide for the development of warehouse uses that are

responsive to local, national, and international trade demands; and create new employment opportunities within the City of Los Angeles and Harbor Gateway.

#### **d. Environmentally Superior Alternative**

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

Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the alternatives indicates that the Existing Zoning Alternative is environmentally superior. However, since the Existing Zoning Alternative is another "no project" alternative under 15126.6(e)(3)(A). As stated above, should the No Project Alternative be the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining Alternatives. Therefore, in accordance with the CEQA Guidelines, the Reduced Project Alternative is the Environmentally Superior Alternative. This alternative represents a reduced density development that is in accordance with existing zoning and land use designations allowed within the Project Site. However, the Reduced Project Alternative would reduce, but not eliminate, the Project's significant and unavoidable operational air quality impact. All other impacts would be less than or similar to those of the Project

Although the Reduced Project Alternative would reduce the Project's significant environmental impacts, it would not eliminate the Project's significant and unavoidable impact. In addition, Reduced Project Alternative would only partially meet the Project's objectives to provide the entitlements and framework for the development of warehouse uses that are responsive to local, national, and international trade demands; provide employment opportunities for community residents; and facilitate a Project that provides goods to the regional economy but not to the same extent as the Project.