

# VI. Other CEQA Considerations

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## 1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impact with respect to regional air quality during operation due to the exceedance of the significance threshold for nitrogen oxides (NO<sub>x</sub>). Furthermore, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, cumulative impacts with respect to regional air quality during operation due to the exceedance of the significance threshold for NO<sub>x</sub> would also be significant and unavoidable.

### a. Air Quality

As discussed in Section IV.B, Air Quality, the Project would exceed the South Coast Air Quality Management District (SCAQMD) regional significance threshold for NO<sub>x</sub> during operation. Implementation of all feasible mitigation measures would reduce, but not eliminate, Project impacts. As such, Project operation would result in significant and unavoidable impact with regard to regional NO<sub>x</sub> emissions.

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by SCAQMD to be a substantial source of air pollution and does not add significantly to a cumulative impact. Operation of the Project after incorporation of mitigation measures would still result in emissions in excess of the SCAQMD regional emissions thresholds for NO<sub>x</sub>. Therefore, the air pollutant emissions associated with the Project would be cumulatively considerable and, therefore, significant and unavoidable.

## 2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reason why the Project has been proposed are grounded in a comprehensive list of project objectives included in Section II, Project Description, of this Draft EIR.

As provided in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to create a professional, well-maintained, and attractive environment for the development of a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Harbor Gateway Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land uses plans, including SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The 2020-2045 RTP/SCS retains the same purpose as the previous RTP/SCS plans in focusing and providing an integrated approach for accommodating project population, household, and employment growth, and transportation needs in the SCAG region by year 2045. The Project would be consistent with the 2020-2045 RTP/SCS strategy of increasing employment within High Quality Transit Areas (HQTAs) as the Project Site is within an identified HQTA and is anticipated to provide up to 250 jobs. The Project would also provide improvements to the pedestrian network by installing new or upgraded paved sidewalks along the three roadways that front the Project Site. Furthermore, the Project would also provide public transit improvements by installing a bus turnout and bus shelter for the existing bus stop adjacent to the Project Site on Vermont Avenue in addition to installing 32 bicycle parking spaces on-site. These proposed improvements could contribute to increasing bicycle and pedestrian trips and public transit use.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than the No Project/No Build Alternative, none of the alternatives would eliminate the Project's significant and unavoidable air quality impact. However, the No Project/No Build Alternative would not achieve any of the Project's objectives. In addition, the environmentally superior alternative, the Reduced Project Alternative, would not eliminate the Project's significant operational air quality impact. The Reduced Project Alternative would also only partially meet the Project's 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 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 but not to the same extent as the Project.

Based on the above, the Project reflects a development that is consistent with the City's General Plan land use designation and zoning designation. The benefits of the Project include the creation of new employment opportunities, promotion of goods movement in a location with superior access to freeways proximate to the Ports of Long Beach and Los Angeles, and opportunities for positive economic benefits to the City.

### **3. Significant Irreversible Environmental Changes**

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed

project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area), generally commit future generations to similar uses. Irreversible damage also can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

### **a. Building Materials and Solid Waste**

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

As discussed in Section VI.6, Effects Found Not to be Significant, of this Draft EIR below, during construction of the Project, a minimum of 50 percent of construction and demolition debris would be diverted from landfills. Further, the additional increase in solid waste generated during operation of the proposed Project would be within the landfill’s remaining permitted capacity and is not anticipated to exceed the existing capacity. In addition, the Project would participate in City programs that adhere to State and local solid waste policies and objectives that further goals to divert waste from landfill disposal. The Project would also comply with the California Integrated Waste Management Act of 1989 (AB 939), which was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Thus, the consumption of non-renewable building materials, such as lumber, aggregate materials, plastics, would be reduced. As discussed in Section IV.6, Effects Found Not to be Significant, of this Draft EIR and in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, Project impacts with respect to solid waste generation and compliance with federal, State, and local solid waste regulations would be less than significant.

### **b. Water**

Consumption of water during construction and operation of the Project is addressed in Section VI.6, Effects Found Not to be Significant, of this Draft EIR and in the Initial Study prepared for the

Project. As evaluated therein, the Project would generate the need for approximately 32,669 gallons per day (gpd) of water. The addition of approximately 340,298 square feet of warehouse/manufacturing/high-cube warehouse/distribution center use as a result of the Project would be consistent with Citywide growth and buildout projections assumed in the 2015 Urban Water Management Plan (UWMP). Therefore, the Project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the UWMP. Thus, it is anticipated that the Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet Project demands.

Additionally, the Project would be required to implement a water conservation strategy and demonstrate a minimum 20-percent reduction in indoor water usage when compared to baseline water demand (total expected water demand without implementation of the water conservation strategy). Therefore, impacts related to the availability of adequate water supplies to serve the Project from existing entitlements and reasonably foreseeable future development during normal, dry and multiple dry years would be less than significant.

As evaluated in Section VI.6, Effects Found Not to be Significant, of this Draft EIR and in the Initial Study, while the Project would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

### **c. Energy Consumption**

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. As discussed in Section IV.D, Energy, of this Draft EIR, construction activities for the Project would not require the consumption of natural gas but would require the use of electricity and fossil fuels. The electricity demand at any given time would vary throughout the construction period based on the construction activities performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, the construction contractors are required to minimize non-essential idling of construction equipment during construction, in accordance with CCR Section 2449, Title 13, Article 4.8, Chapter 9. Therefore, Project-related construction activities would not result in wasteful or unnecessary energy demands.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company (SoCal Gas), respectively. Specifically, the estimated net electricity use by the Project would be 2.4 GWh/year. The Project would also include a rooftop solar installation or other renewable energy power source that is anticipated to generate 460,000 kWh/year of energy on-site. Furthermore, the Project would be consistent with the requirements of the current Building Energy Efficiency Standards and the CALGreen Code. Overall, with

compliance with these two regulations and inclusion of the proposed rooftop PV system, the Project would not result in wasteful or unnecessary electricity demands.

With regard to natural gas, the estimated natural gas demand by the Project would be 7,112,230 kilo-British thermal units (kBTU) per year. Because the Project would be built to meet the Building Energy Efficiency Standards, the Project would not result in wasteful or unnecessary natural gas demands.

With regard to transportation fuel, estimates of transportation energy use associated with on-road vehicles is assessed based on the overall VMT and related transportation energy use. The annual VMT for the Project is estimated to be 15,816,147 miles.

However, since the Project would involve the development of a warehouse, its implementation would provide more opportunities for employment for residents of the City with nearby amenities and public transit options. In addition, in compliance with the CALGreen Code, the Project would include bicycle racks and storage for employee use, which would encourage employees to bicycle to work, 20 passenger vehicle stalls with electric vehicle charging equipment and parking stalls with infrastructure installed capable of supporting future electric vehicle supply equipment for at least 38 stalls. The Project would also implement TDM measures to 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. Thus, these features of the Project would contribute toward minimizing VMT and transportation-related fuel. Therefore, it is expected that operation-related fuel usage associated with the Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Based on the preceding, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

#### **d. Environmental Hazards**

The Project's potential use of hazardous materials is addressed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR. As discussed, construction activities would include the routine use of materials, such as fuels, lubricants, and greases in construction equipment and coatings used in construction. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the proposed Project's construction phase. Project construction workers would also be trained in safe handling and hazardous materials use.

Additionally, during Project operation, the use, storage, transport, and disposal of hazardous materials would be required to conform to existing laws and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible

environmental change that could result from the accidental release of hazardous materials. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

### **e. Conclusion**

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial given the small scale of the Project. In addition, none of the materials required to construct the Project would be rare or in highly limited supply. Further, such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant. Considering that the Project would consume an insubstantial amount of natural resources, and it is replacing an existing vacant urban use on an infill redevelopment site, the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

## **4. Growth Inducing Impacts**

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

With regards to population growth, the Project proposes a new industrial center and does not propose any residential uses that could generate direct population growth as a result of housing opportunities. Therefore, the Project would not result in a significant growth-inducing impact.

During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from short-term employment.

Additionally, as discussed in Section VI.6, Effects Not Found to be Significant, of this Draft EIR, the Project is anticipated to result in an increase of approximately 250 jobs. SCAG's 2040 employment projections for the City estimate that employment will increase from 1,696,400 employees in 2012 to 2,169,100 in 2040. Project-generated jobs are well within the employment projections for the cities of Los Angeles and Gardena. Therefore, the Project would not result in a significant direct growth-inducing impact.

The area surrounding the Project Site is already developed with residential, commercial, light industrial, and institutional uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. The Project would connect to existing infrastructure systems and would not require relocation or construction of new infrastructure facilities. Furthermore, the Project would upgrade existing electric power systems to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen standards (Title 24, Part 11) and would provide rooftop solar or other renewable energy system to offset the office electrical consumption. Therefore, the Project would not result in a significant direct growth-inducing impact related to utilities and infrastructure.

## **5. Potential Secondary Effects of Mitigation Measures**

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

### **a. Air Quality**

Mitigation Measures AQ-MM-1 to AQ-MM-6 are included in Section IV.B, Air Quality, of this Draft EIR, to reduce the Project's air quality regional impacts during construction and operation, particularly those impacts related to NO<sub>x</sub> emissions. Specifically, Mitigation Measure AQ-MM-1

would require 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. Mitigation Measure AQ-MM-2 would require the construction contractor shall, at minimum, use paints with a VOC content of 50 grams per liter or less for all surface parking lot striping. Mitigation Measure AQ-MM-3 would require the use of only electric-powered off-road equipment (e.g., yard trucks/hostlers) on-site for daily warehouse and business operation. Mitigation Measure AQ-MM-4 would require 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. Mitigation Measure AQ-MM-5 would require all landscaping equipment (e.g., leaf blower) used for property management to be electric-powered only. Mitigation Measure AQ-MM-6 would require all transport trucks utilized for daily operations to 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. Mitigation Measure AQ-MM-7 is included to reduce odor impacts during operation and would require an odor management plan. These mitigation measures would be beneficial in reducing air quality impacts and would not result in adverse secondary impacts.

## 6. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that 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 detailed in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides 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 of Los Angeles 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. A summary of the analysis provided in the Initial Study included in Appendix A of this Draft EIR for these issue areas is provided below.

### a. Aesthetics

The Project Site is not located near any scenic vista; therefore, no impact would occur. According to the California Scenic Highway Mapping System of the California Department of Transportation, the Project Site is not on or near a major State-designated scenic highway. Therefore, the Project would not damage scenic resources within a State scenic highway, and no impact would occur.



## **b. Agriculture and Forestry Resources**

The Project Site is currently vacant and is not mapped as important farmland in the Farmland Mapping and Monitoring Program maintained by California Department of Conservation. The Project Site is currently zoned as M2-1VL-O and not zoned for agriculture use, forest land, timberland, or timberland production or identified as a site under a Williamson Act contract. As such, the Project would not convert farmland to a non-agriculture use, conflict with any zoning for agriculture uses or a Williamson Act contract, conflict with existing zoning for, or cause rezoning of forest land or timberland, result in the loss or conversion of forest land, or result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts to agriculture and forestry resources would occur.

## **c. Biological Resources**

The Project Site is located in a completely built-out urbanized environment and is currently paved with concrete. There are no natural or native plant communities on the Project Site. As a result, no suitable habitat for candidate, sensitive, or special status species exist on the Project Site. Therefore, the proposed Project would not have any effect on any candidate, sensitive, or special status species through habitat modifications, and no impact would occur.

Additionally, there are no riparian habitats or other sensitive natural community located on the Project Site and the surrounding areas. Therefore, the Project would not have any effect on any riparian habitat or other sensitive natural community, and no impact would occur.

Similarly, no wetlands were identified on the Project Site and its surrounding areas. Therefore, the Project would not have any effect on wetlands, and no impact would occur.

Furthermore, no surface water bodies, streams or waterways occur on the Project Site. The Project Site neither provides nursery sites for wildlife nor is conducive to function as a corridor for migratory wildlife. There are a limited number of ornamental trees on-site within the adjacent public right-of-way that would be removed and replaced with a new sidewalk, trees, and landscaping. Nesting migratory birds are protected under the Migratory Bird Treaty Act of 1918 (MBTA) (United States Code, Title 16, Sections 703–712) and California Fish and Game Code Sections 3503 et seq. Compliance with federal MBTA and California Fish and Game Code would reduce the impact to a less than significant level. Therefore, the Project would not interfere with the movement of any native resident or migratory species or impede the use of native wildlife nursery sites, and no impact would occur.

The Project Site does not contain any locally protected trees. Therefore, there would be no impact related to conflicts with local policies and ordinances protecting biological resources.

Lastly, there are no adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans that govern the Project Site

or the surrounding areas. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, and no impact would occur.

#### **d. Cultural Resources**

The Project Site is currently vacant, and there are no identified historical resources on-site according to the Los Angeles Historic Resources Inventory. Therefore, the Project would result in no impact to historical resources. Additionally, in the unlikely event of discovery of human remains on-site, the Project applicant would be responsible for compliance with California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5. California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within the Project Site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. The Project would comply with existing law, and potential impacts to human remains would be less than significant.

#### **e. Energy**

The California Renewables Portfolio Standard (RPS) was established in 2002 under SB 1078 and was amended in 2006 and 2011. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Renewable energy sources include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the State's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target. The Project would be serviced by the LADWP and would provide a rooftop solar installation or other renewable energy power system to offset the expected house

meter and office electrical consumption of the tenant. Therefore, the Project would not obstruct a State or local plan for energy efficiency.

## **f. Geology and Soils**

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone; therefore, no impact would occur.

There are multiple known active faults in the Southern California region, making it susceptible to strong ground shaking from severe earthquakes. Therefore, a major earthquake along any of the region's major active faults would likely cause seismic ground shaking at the Project Site. Consequently, construction of the Project could expose people and structures to strong seismic ground shaking. Project-related structures and buildings would be required to be designed and built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]). Therefore, as structures would be designed to meet or exceed CBC standards for earthquake resistance, development of the Project would create less than significant impacts related to seismic ground shaking.

According to the City's Zone Information and Map Access System (ZIMAS), the Project Site is not located within a liquefiable area or potentially liquefiable area. The Seismic Hazards Map for the Inglewood Quadrangle, published by the California Geological Survey indicates that the Project Site is not located within a designated liquefaction hazard zone. In addition, the subsurface conditions encountered at the boring locations are not conducive to liquefaction. Specifically, the Project Site is underlain by significant amounts of stiff to very stiff silts and clays. Additionally, no groundwater was encountered within the upper 30 feet during drilling. Therefore, the Project would not cause personal injury or death or result in property damage as a result of seismic-related ground failure, including liquefaction, and no impact would occur.

Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The Project Site and surrounding area are generally flat with no significant slopes. According to ZIMAS, the Project Site is not located within a landslide area. Therefore, no impacts related to landslides are anticipated.

Although soils in the Project Site could experience erosion during construction and development, implementation of the Project would not cause substantial soil erosion. Future development within the Project Site would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP) specifying best management practices (BMPs) for minimizing pollution of stormwater with soil and sediment during Project construction. Adherence to the BMPs in the SWPPP and City's Low Impact Development (LID) Ordinance would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Therefore, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

Project-related structures and buildings would be required to be designed and built-in compliance with the CBC and the City of Los Angeles Building Code, which requires the Project to implement the recommendations of the site-specific geotechnical investigation. The recommendations require foundations to be constructed based on the expansion index and shear strength of on-site soils. Compliance with the CBC and City Building Code would ensure impacts to unstable and expansive soils would be less than significant.

The Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative wastewater disposal systems, and no impact related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would occur.

### **g. Hazards and Hazardous Materials**

The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, implementation of the Project would not result in hazards related to aircraft operation, and no impact would occur.

The Project is located approximately 0.13 mile west of I-110, the nearest designated Disaster Route. The Project would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project Site or surrounding area. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

The Project Site is in a highly urbanized, built-out portion of the City and is outside of the Very High Fire Hazard Severity Zone designated by the California Department of Forestry and Fire Protection (CAL FIRE). Future development under the Project would not pose wildfire-related hazards to people or structures. Therefore, no impact would occur.

### **h. Hydrology/Water Quality**

Water supply to the Project would be provided by LADWP and would not require the use of groundwater at the Project Site. Therefore, the Project would not require direct additions or withdrawals of groundwater. Excavation that would result in the interception of existing aquifers or penetration of the existing water table is not proposed or anticipated. In addition, since the existing Project Site is mostly impervious, the Project would not reduce any existing percolation of surface water into the groundwater table.

According to the Safety Element of the City of Los Angeles General Plan, Inundation & Tsunami Hazard Areas, the Project Site is not located within the potential inundation area. The Project Site is also not located near any water storage tanks or reservoirs that would be at risk of seiche during

seismic activity. Therefore, the possibility of the Project being affected by a tsunami, seiche, or flooding is negligible, and no impact would occur.

### **i. Land Use and Planning**

The Project is a new infill development in an urbanized area and would not divide an established community. The Project Site is also vacant and underutilized, and development of the Project Site would redevelop the Site and put it back to productive economic uses. The Project would not involve any street vacation or closure or result in development of new thoroughfares, highways, or major infrastructure, and no impact related to the division of an established community would occur.

Additionally, the Project Site is located within the Harbor Gateway Community Plan Area. The Project Site is zoned M2-1, with a General Plan land use designation of Light Manufacturing. The proposed Project would be comprised of approximately 340,298 square feet of warehouse/manufacturing/high-cube warehouse/distribution center use. A warehouse/manufacturing/high-cube warehouse/distribution center is a permitted use in M2 zoned lots with a maximum floor area of approximately 1,045,907 square feet. The Project Applicant would redevelop the Project site in accordance with the underlying land use designations and applicable zoning ordinance development standards. Accordingly, the Project would not conflict with the General Plan or Zoning Code. No change to the existing land use designation is required or proposed with the Project. Therefore, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation and no impact would occur.

### **j. Mineral Resources**

According to the City of Los Angeles General Plan Conservation Element, the Project Site is not identified in a Mineral Resource Zone-2 (MRZ-2). MRZ-2 zone is defined by the State of California Geologist as an area in which deposits are of significance to the state. Additionally, the Project Site is not identified by the City as being located in a State-designated oil field or within an oil drilling district. Therefore, the Project would not result in the loss of availability of mineral resources or locally important mineral resource recovery site, and no impact would occur.

### **k. Noise (Airport and Airstrip)**

The Project is not located within an airport land use plan area, or within two miles of any public or public use airports, or private air strips. Therefore, no impact would occur.

### **l. Population and Housing**

The Project is anticipated to result in an increase of approximately 250 jobs. SCAG's 2040 employment projections for the City estimate that employment will increase from 1,696,400 employees in 2012 to 2,169,100 in 2040. Project generated jobs are well within the employment

projections for the cities of Los Angeles and Gardena. Operation of the Project would not induce substantial population growth in the Project area, either directly or indirectly, and would not exceed regional or local growth projections. Therefore, impacts would be less than significant. The Project Site is vacant and is currently zoned for light industrial uses with no residential zoning planned or currently on site. Therefore, the Project would not result in the displacement of any people or housing, and no impact would occur.

### **m. Public Services**

#### **(1) Fire Protection**

LAFD provides fire protection and emergency medical services to the Project area. The LAFD generally considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. The Project Site and the surrounding area are currently served by Fire Station 64, located at 10811 South Main Street (approximately 3 miles south of the Project Site). There are also two Los Angeles County Fire Department (LACoFD) stations within close proximity to the Project Site. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given the location of existing fire stations, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the Project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. Also, in the event of an emergency at the Project Site that required more resources than the closest station, LAFD, if needed, would request assistance from other nearby fire departments pursuant to mutual aid agreements. The Project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, and impacts would be less than significant.

#### **(2) Police Protection**

The Project and surrounding areas are currently served by the Los Angeles Police Department's (LAPD) Southeast Community Police Station, located at 145 West 108th Street (approximately 3 miles south of the Project Site). To maintain the level of police protection and emergency services, the LAPD may require additional police personnel and equipment. However, given the location of existing police stations located at 145 West 108th Street, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the Project and maintain acceptable service ratios, response times, or other performance objectives for police protection. The Project would not create capacity/service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Impacts would be less than significant.

### (3) Schools

The Project would not result in population growth or generate additional students, which could generate a demand for school facilities that would exceed the capacity of the school district. Therefore, no impact to schools would occur.

### (4) Parks

The Project is an industrial center and does not include the construction or alteration to the existing environment or use which would exceed the capacity or capability of the local park system. Therefore, no impact to parks would occur.

### (5) Other Public Facilities

The Project does not include any construction or alteration to the existing environment or use which would generate a demand for other public facilities which exceed the capacity available to serve the Project Site. Therefore, no impact to other public facilities would occur.

## n. Recreation

### (1) Increase the Use of Existing Park and Recreational Facilities Such that the Substantial Physical Deterioration of the Facilities Would Occur or Be Accelerated

The Project does not include any construction or alteration to the existing environment or use which would exceed the capacity or capability of the local park system to serve the proposed Project. The Project is an industrial center with no necessity for the construction or expansion of recreational facilities. Therefore, no impact to recreation would occur.

### (2) Require the Construction or Expansion of Recreational Facilities Which Might Have an Adverse Physical Effect on the Environment

The Project is an industrial center with no necessity for the construction or expansion of recreation facilities. Therefore, no impact would occur.

## o. Transportation

The Project's truck traffic would be diverted away from automobile traffic via two separate access driveways off of Vermont Avenue and Orchard Avenue. In addition, the Project does not propose substantial changes to the street network surrounding and supporting the Project Site—such as the redesign or closure of major streets—or increase hazards or impact emergency access due to design features. Instead, the existing surrounding roadway circulation system would be maintained, and no substantial changes or significant congestion would occur that would affect the ability of emergency vehicles to continue to serve all areas of the Project Site. Furthermore,

where applicable, circulation and design features associated with the Project would be required to meet LAFD's design and development standards, as applicable, and would be subject to review by LAFD. Adherence to the design and development standards would ensure that safe and efficient movement of vehicles and pedestrians is provided. Finally, the Project does not propose to introduce new incompatible uses (e.g., farm equipment) into the City's circulation system. Based on the preceding, development of the Project would not result in a substantial increase in hazards due to a geometric design feature or incompatible use.

The Project Site is located approximately 0.13 mile west of I-110, the nearest designated Disaster Route. The Project would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project Site or surrounding area. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of LAFD. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

## **p. Utilities and Service Systems**

There are numerous existing water connections along Redondo Beach Boulevard that are adequate to serve the Project. Based on a water usage rate of 120 percent of the sewage generated (see below), the Project would generate the need for approximately 32,669 gallons per day (gpd) of water. The addition of approximately 340,298 square feet of warehouse/manufacturing/high-cube warehouse/distribution center use as a result of the Project would be consistent with Citywide growth and buildout projections assumed in LADWP's 2015 UWMP. Therefore, the Project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the UWMP. Thus, it is anticipated that the proposed Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet Project demands.

The Project sewer needs can be served from the existing 15-inch sewer main in east half of Vermont Avenue. This existing 15-inch sewer main connects directly to the Gardena Pump Relief Trunk Sewer located at the intersection of Redondo Beach Boulevard and Vermont Avenue. The 15-inch sewer main has adequate capacity to serve the Project. In addition, the Project Site has existing 6-inch sewer lines that connect to the existing 12-inch sewer main in Redondo Beach Boulevard. This 12-inch sewer main requires flow rate monitoring to determine the actual flow rate in the system to prove it is adequate to serve the Project. Based on a wastewater generation rate of 80 gpd per 1,000 gross square feet, the Project would generate approximately 27,224 gpd of wastewater. The Project would account for a small percentage of average daily wastewater flow compared to the total average daily flow experienced by the Hyperion Treatment Plant (HTP), which averages approximately 275 million gallons per day (mgd) with a peak capacity of 800 mgd, according to the City of Los Angeles Sanitation & Environment.



Telecommunication and electric services would be provided by local service providers in the Project area. As electricity and telecommunications infrastructure already exists in the surrounding area, services would be connected to existing systems and would, therefore, not require the construction of new or expanded facilities. Furthermore, the Project would upgrade existing electric power systems to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen standards (Title 24, Part 11) and would provide rooftop solar or other renewable energy system to offset the office electrical consumption. Therefore, the Project would not require the relocation or construction of new or expanded electric power facilities. As such, impacts related to the construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

Wastewater from the Project would be treated at the HTP, which is a part of the Hyperion Treatment System, which includes the Tillman Water Reclamation Plant and the Los Angeles-Glendale Water Reclamation Plant. The wastewater generated by the Project would be typical of an industrial use. The Hyperion Treatment System is in compliance with the State's wastewater treatment requirements. The generation of wastewater from the Project would be minimal compared to the average daily flow of HTP and would not exceed the wastewater treatment requirements of the LARWQCB. Furthermore, as a proportion of total average daily flow experienced by the HTP, the wastewater generation of the proposed Project would account for a small percentage of average daily wastewater flow. This increase in wastewater flow would not jeopardize the HTP to operate within its established wastewater treatment requirements. Therefore, impacts to wastewater treatment capacity would be less than significant.

Solid waste generated during the operation of the Project is anticipated to be collected by LASAN or private waste haulers and is anticipated to be hauled to Sunshine Canyon Landfill. Sunshine Canyon Landfill is permitted to receive 12,100 tons of solid waste per day and accepts approximately 8,300 tons of waste daily. The Project is estimated to generate approximately 1.42 pounds per 100 square feet per day, resulting in 4,832.2 pounds per day or 2.4 tons per day. The Project's increase in solid waste is well within the landfills remaining permitted capacity and is not anticipated to exceed the existing capacity. In compliance with Assembly Bill (AB) 939, the Project applicant would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Project from the Sunshine Canyon Landfill. In addition, the City of Los Angeles Solid Waste Integrated Resources Plan provide a series of policies, programs, and facilities required to reach the City's goals of 75 percent diversion by 2013 and 90 percent diversion by 2025 in the City of Los Angeles. As under current conditions, solid waste generated on site would be disposed of in accordance with all applicable federal, State, and local regulations related to solid waste. In addition, as the Project Site is located within California, it would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939) which was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Therefore, the solid waste impacts resulting from implementation of the Project would be less than significant.

## **q. Wildfire**

The Project Site is not in or near an State Responsibility Area (SRA) or Local Responsibility Area (LRA) or lands classified as Fire Hazard Severity Zones (FHSZ). The nearest FHSZ is approximately 7.5 miles to the south at Palos Verdes Estates and the four cities in the Palos Verdes Peninsula are all designated as a Very High Fire Hazard Severity Zone. Given that the Project Site is not in or near lands classified as high fire hazard severity zones, probability of burning remains low. There is no wildland vegetation in, adjacent to or in proximity of the Project Site. Landforms, such as slopes and canyons speed wildfire spread; there are no such landforms in the Project Site. Additionally, development of the Project does not add wildland vegetation to the site or change site topography (such as adding large slopes) so as to exacerbate wildfire spread. Therefore, no impact to wildfire would occur.