



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

MITIGATED NEGATIVE DECLARATION

Fallbrook Point Project

Case Number: ENV-2021-10328-MND
DIR-2021-10327-SPR

Project Location: 22815 – 22825 West Roscoe Boulevard, Los Angeles, CA 90021

Community Plan Area: Chatsworth – Porter Ranch

Council District: 12

Project Description: Staley Point Capital (the “Applicant”) proposes to redevelop an existing surface parking lot located at 22815 and 22825 West Roscoe boulevard (“Project Site” or “Site”). The Project Site consists of an approximately 6.99-acre site irregularly shaped parcel designated APN 2005-002-018 which is currently zoned for limited industrial uses ([T][Q]M1-1) and has a land use designation of Limited Industrial. The Project Site is located at the northwest corner of the intersection of Roscoe Boulevard and Fallbrook Avenue, and is situated within the larger Corporate Pointe West Hills Business Park.

The Project Site is currently developed as a paved parking area with associated landscaping. Two existing driveways provide access from Roscoe Boulevard and Fallbrook Avenue to the Project Site as well as the larger business park. Adjacent land uses include industrial and manufacturing facilities with associated parking lots to the north and west, and single-family residences to the east and south. An existing commercial retail/restaurant development is located southeast of the Project Site.

The Project would develop the site with three warehouse/manufacturing buildings with two-story heights not exceeding 37 feet. The three buildings would have floor areas of approximately 49,892 square feet, 31,169 square feet, and 17,553 square feet, for a Project total of approximately 98,614 square feet. The Project’s total floor area would include approximately 23,500 square feet for potential office use, 19,000 square feet for manufacturing, and 56,114 square feet for warehouse use. The Project would provide 262 paved parking spaces within the site for employee vehicle use, and a total of 10 truck dock doors would be provided (two at the smallest building and four at each of the other two buildings). The truck dock bays would face the interior of the site, with dock doors and ramps recessed within the footprint of the structures such that loading docks would be shielded from residential uses in the vicinity.

A preliminary landscaping plan indicates a variety of tree species would be installed in along the parking area and building perimeters, and along Fallbrook Avenue and Roscoe Boulevard. The Project would also retain a total of 32 existing trees within or adjacent to the site, including 27 existing trees that would be retained within a landscaped buffer area along Roscoe Boulevard at the southern boundary.

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

PREPARED BY:
Envicom Corporation
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April 2022

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1.0 INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to disclose and evaluate the environmental impacts of the Fallbrook Point Project (“Project”), to be located at 22815 and 22825 W. Roscoe Boulevard (“Project Site” or “Site”) in the Chatsworth-Porter Ranch Plan Area of the City of Los Angeles (City).

PROJECT SUMMARY

The Project Site consists of an approximately 6.99-acre site irregularly shaped parcel designated APN 2005-002-018 which is currently zoned for limited industrial uses ([T][Q]M1-1) and has a land use designation of Limited Industrial. The Project Site is located at the northwest corner of the intersection of Roscoe Boulevard and Fallbrook Avenue, and is situated within the larger Corporate Pointe West Hills Business Park.

The Project Site is currently developed as a paved parking area with associated landscaping. Two existing driveways provide access from Roscoe Boulevard and Fallbrook Avenue to the Project Site as well as the larger business park. Adjacent land uses include industrial and manufacturing facilities with associated parking lots to the north and west, and single-family residences to the east and south. An existing commercial retail/restaurant development is located southeast of the Project Site.

The Project would develop the site with three warehouse/manufacturing buildings with two-story heights not exceeding 37 feet. The three buildings would have floor areas of approximately 49,892 square feet, 31,169 square feet, and 17,553 square feet, for a Project total of approximately 98,614 square feet. The Project’s total floor area would include approximately 23,500 square feet for potential office use, 19,000 square feet for manufacturing, and 56,114 square feet for warehouse use. The Project would provide 262 paved parking spaces within the site for employee vehicle use, and a total of 10 truck dock doors would be provided (two at the smallest building and four at each of the other two buildings). The truck dock bays would face the interior of the site, with dock doors and ramps recessed within the footprint of the structures such that loading docks would be shielded from residential uses in the vicinity.

A preliminary landscaping plan indicates a variety of tree species would be installed in along the parking area and building perimeters, and along Fallbrook Avenue and Roscoe Boulevard. The Project would also retain a total of 32 existing trees within or adjacent to the site, including 27 existing trees that would be retained within a landscaped buffer area along Roscoe Boulevard at the southern boundary.¹

LEGAL AUTHORITY

As Lead Agency, the City of Los Angeles Department of City Planning (City Planning) has prepared this IS/MND in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000–21189) and relevant provisions of the *CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000–15387), as amended.

Initial Study. Section 15063(c) of the CEQA Guidelines defines an Initial Study (IS) as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an IS are:

- (1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND);

¹ Psomas, Tree Inventory Report for the Fallbrook Point Project Site, West Hills, California, August 16, 2021.

- (2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
- (3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 states a public agency shall prepare a Negative Declaration or MND for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
- (b) The initial study identifies potentially significant effects, but:
 - 1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - 2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

A MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

2.0 FINDINGS OF THIS INITIAL STUDY

The analysis in this IS/MND demonstrates that with the implementation of mitigation measures, the Project would have a less than significant impact on the environment with regard to all CEQA Checklist issues. For each issue addressed in Section 4.0, the impacts associated with development of the Project have been determined to be “Significant Unless Mitigation Incorporated,” “Less Than Significant,” or “No Impact.” For issues that were determined to be “Significant Unless Mitigation Incorporated,” mitigation measures have been identified that would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

PROJECT LOCATION AND EXISTING USES

The Project Site is an approximately 6.99-acre irregularly shaped parcel designated APN 2005-002-018 which is currently zoned for Limited Industrial uses ([T][Q]M1-1) and has a land use designation of Limited Industrial. The Project Site is located at the northwest corner of the intersection of Roscoe Boulevard and Fallbrook Avenue, and is situated within the larger Corporate Pointe West Hills Business park. The Project Site is currently developed as a paved parking area with associated landscaping. Adjacent land uses include industrial and manufacturing facilities with associated parking lots to the north and west, and single-family residences to the east and south. An existing commercial development is located southeast of the Project Site. A landscaped buffer area along the southern boundary between the onsite parking lot and Roscoe Boulevard includes an unpaved walking trail that features unmaintained “fit-trail” exercise equipment and signage remnants. The Project location is shown in **Figure 3-1, Regional Location Map** and **Figure 3-2, Vicinity Map**. The existing conditions of the Project Site as seen from adjacent roadways are shown in **Figure 3-3A, Photographs of the Project Site Perimeter**, and views of the existing parking lot on the Project Site is shown in **Figure 3-3B, Photographs of the Project Site Parking Lot**.

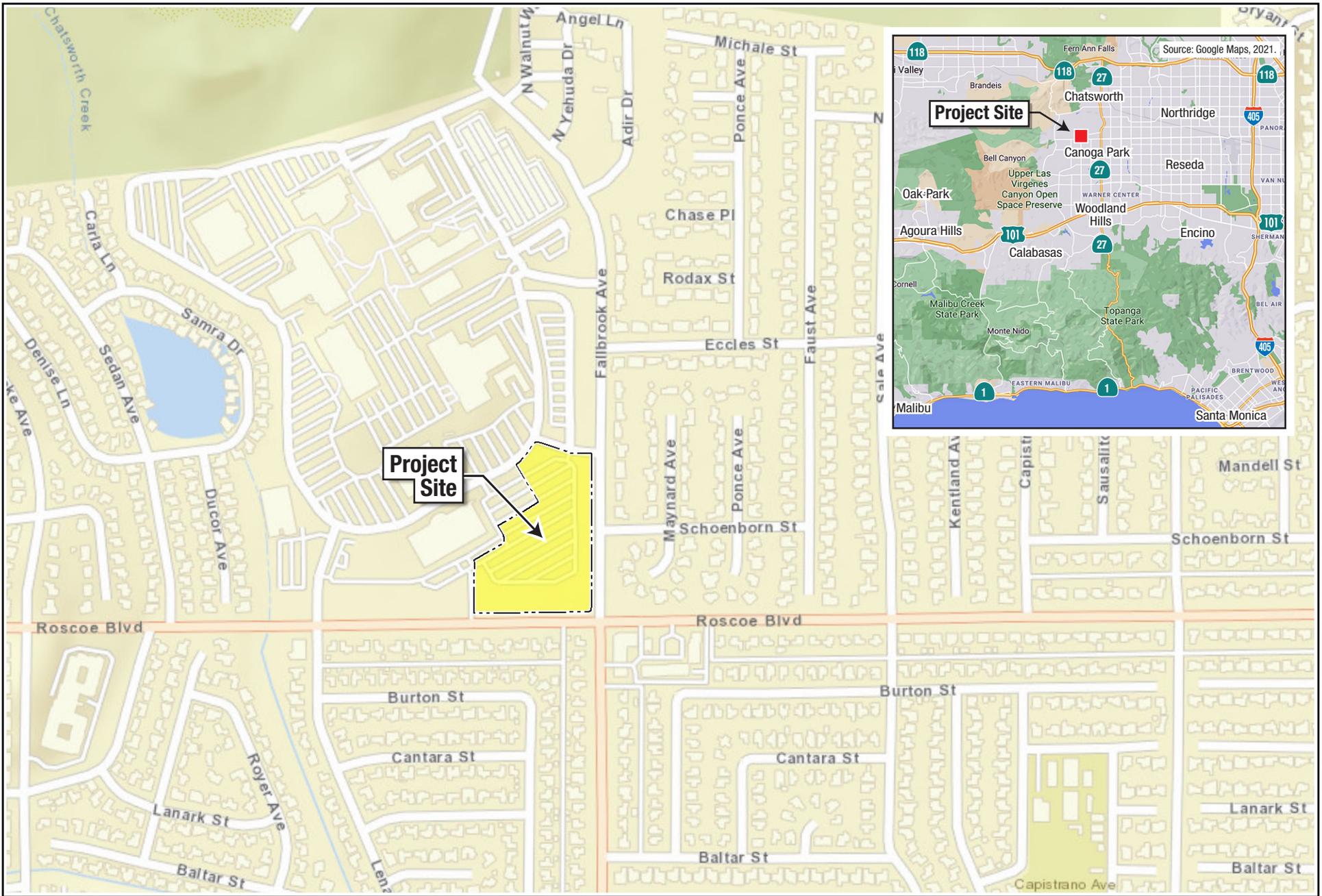
Two existing driveways at the western and northern boundaries of the Project Site provide access from Roscoe Boulevard and Fallbrook Avenue, respectively, to the Corporate Pointe West Hills Business Park’s internal circulation driveway and parking lots, including the existing parking lot that currently occupies the Project Site. The nearest transit station is the Roscoe Station of the Metro G Line (Orange) busway at the intersection of Roscoe Boulevard and Canoga Avenue, approximately 1.5 miles east of the Project Site. The nearest Metro bus stop (Route 152/353) is located at the intersection of Roscoe Boulevard and Fallbrook Avenue adjacent to the Project Site. A pedestrian/bike path is also located in the vicinity along Canoga Avenue and the Metro G Line (Orange) busway.

ZONING AND LAND USE DESIGNATIONS

The Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project Site is zoned [T][Q]M1-1. Pursuant to Ordinance 180,844 (Effective Date September 28, 2009), and Los Angeles Municipal Code (LAMC) Section 12.32 G, the [Q] “Qualified” classification imposes development, environmental, and administrative conditions of approval for development of the Subject Property. According to LAMC Section 12.32 G.2, the purpose of the [Q] classification is to provide within the zoning ordinance that the property may not be utilized for all the uses ordinarily permitted in a particular zone classification, and/or that the development of the site shall conform to certain specified standards, if the limitations are deemed necessary to:

- (1) Protect the best interests of and assure a development more compatible with the surrounding property or neighborhood.
- (2) Secure an appropriate development in harmony with the objectives of the General Plan.
- (3) Prevent or mitigate potential adverse environmental effects of the zone change.

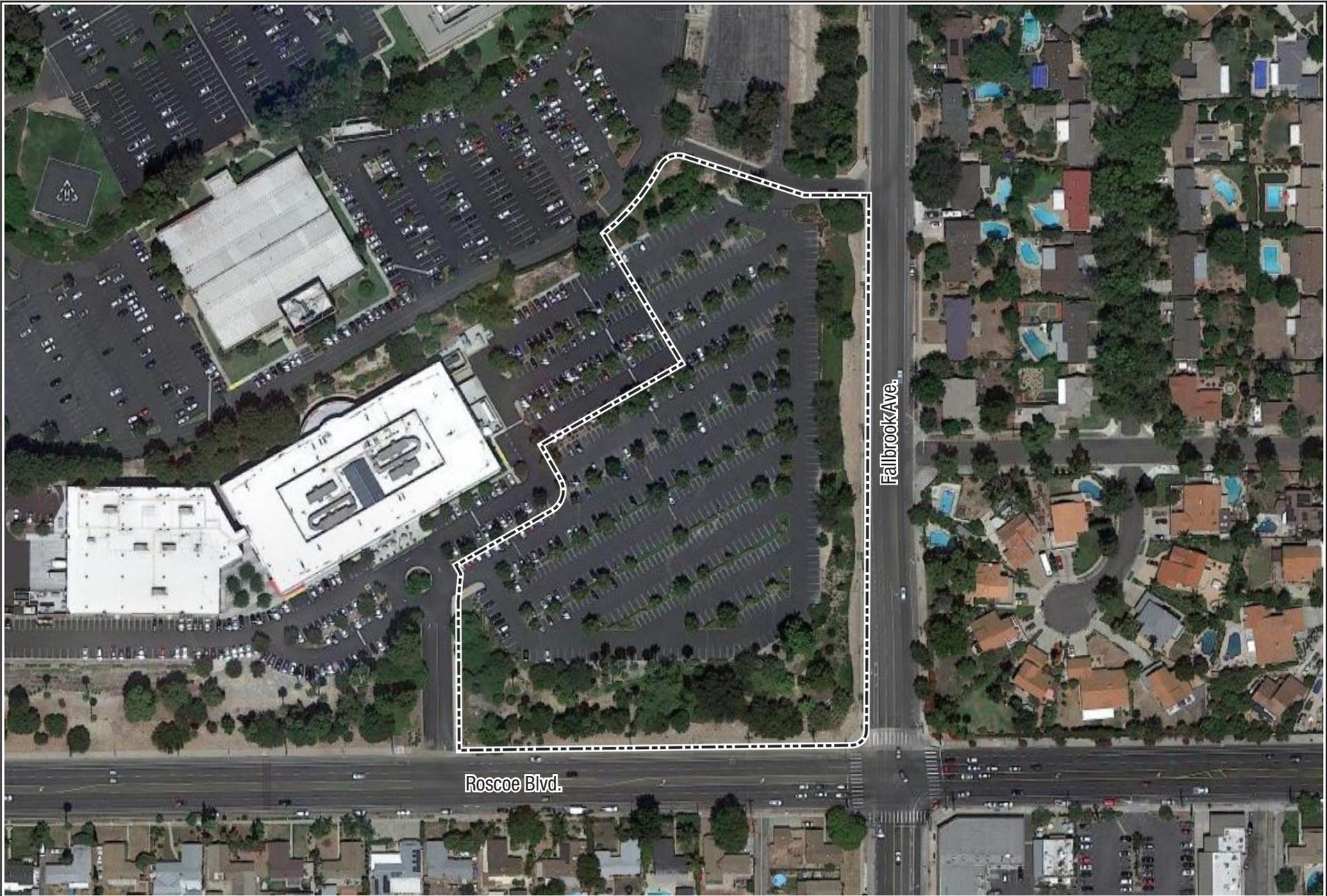
The Project would be designed, constructed, and operated in compliance with all applicable [Q] conditions of approval, including site-specific environmental conditions imposed by the [Q] conditions, as a matter of regulatory compliance. The [Q] conditions for the Project Site permit the development of a warehouse project up to 180,000 square feet of floor area and 45-feet tall; and the Project represents a considerable decrease from the above-described permitted floor area and height. Additionally, pursuant to Case File No. Case DIR-2019-7507-ACI-CLQ, any industrial and manufacturing uses on the site shall be consistent with



Source: ESRI, World Street Map, 2021.

Regional Location Map





Source: Google Satellite Imagery, Aug. 19, 2019.

Vicinity Map





Photo 1 – Northerly view of the Project Site driveway entrance from Roscoe Boulevard. Photo taken April 8, 2021.



Photo 2 – Westerly view of Project frontage along Roscoe Boulevard. Photo taken April 8, 2021.



Photo 3 – Northerly view of Project frontage along Fallbrook Avenue. Photo taken April 8, 2021.



Photo 4 – Southerly view of Project frontage along Fallbrook Avenue. Photo taken April 8, 2021.



● → Photo Locations



Photo 5 – Northeasterly view of the Project Site parking lot. Photo taken April 8, 2021.



Photo 6 – Southeasterly view of the Project Site parking lot. Photo taken April 8, 2021.



Photo 7 – Southwesterly view of the Project Site parking lot. Photo taken April 8, 2021.



Photo 8 – Northerly view of the Project Site parking lot from near the southeast corner of the site. Photo taken April 8, 2021.



Photo 9 – Westerly view of the Project Site parking lot from near the southeast corner of the site.



Photo 10 – Easterly view of the landscaped area between the parking lot and Roscoe Boulevard along the southern boundary of the Project Site. Photo taken April 8, 2021.

accepted principles of “light industrial” uses in which the processes carried on, the machinery used, and the goods and commodities carried to and from the premises will not cause any injury to, or will not adversely affect the amenity of the surrounding residential area by reason of the emission of light, noise, vibration, smell, fumes, smoke, vapor, steam, soot, ash, dust, waste water or other waste products.

PROJECT COMPONENTS

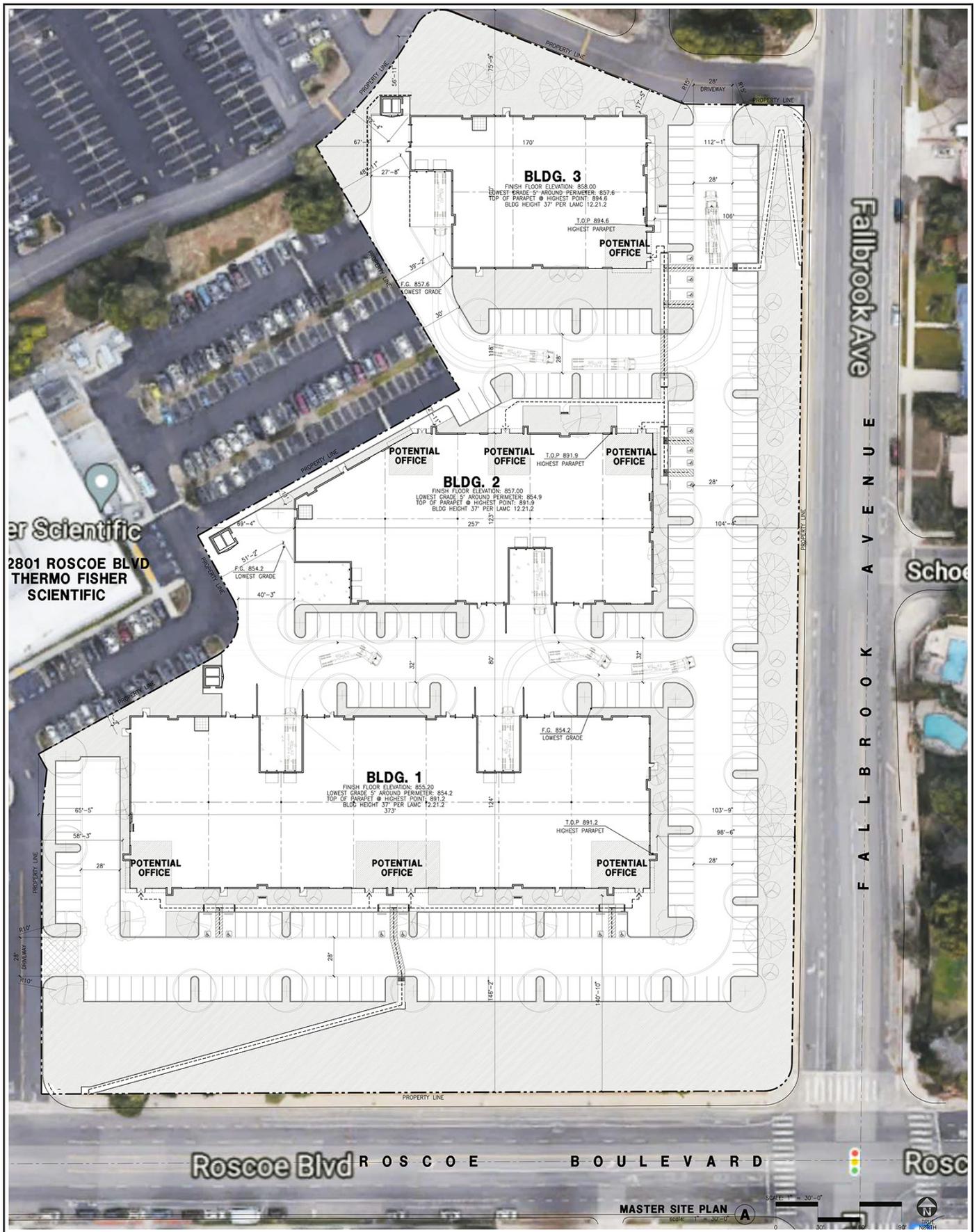
The Project proposes an infill development that would construct three concrete tilt-up warehouse/manufacturing buildings with two-story heights not exceeding 37 feet. The three buildings would have floor areas of approximately 49,892 square feet, 31,169 square feet, and 17,553 square feet, for a Project total of approximately 98,614 square feet. The Project’s total floor area would include approximately 23,500 square feet for potential office use, 19,000 square feet for manufacturing, and 56,114 square feet for warehouse use. The Project would provide a total of 262 paved vehicle parking spaces distributed throughout the property to accommodate parking for each of the three buildings, which exceeds the 150 off-street parking spaces required per Code (LAMC Section 12.21A.4). The Project would provide a total of 15 short-term and 17 long-term bicycle parking racks/lockers distributed among the three proposed buildings, pursuant to LAMC Section 12.21A.16(a)(1)(i). A total of 10 truck dock doors (two at the smallest building and four at each of the other two buildings) would be provided, with truck dock bays that face the interior of the Site, and dock doors and ramps recessed within the footprint of the structures such that loading docks would be shielded from residential uses in the vicinity. Enclosures for trash and recycling bins would be provided along the westerly interior property line of the Subject Property for each of the three buildings, thus maximizing the distance between trash collection activities and existing residences to the east of Fallbrook Avenue.

Figure 3-4, Site Plan, shows an overview of the proposed ground floor footprint, parking, and access driveways. **Figure 3-5, Architectural Elevations (Building 1)** shows elevation renderings of the southernmost proposed structure that is the largest of the proposed buildings. The other two proposed structures would have similar appearing exterior heights and finishes. As depicted in **Figure 3-6, Preliminary Landscape Plan**, the Project would install a variety of tree species in planters along the parking area and building perimeters, and along Fallbrook Avenue. The Project would also retain a total of 32 existing trees within or adjacent to the Site, including 27 existing trees that would be retained within a landscaped buffer area along Roscoe Boulevard at the southern boundary.²

ARCHITECTURAL FEATURES

All three buildings share the same architectural features which are a modern-contemporary industrial concrete tilt-up design utilizing a combination of materials (stucco, eldorado stone, blue non-reflective glazing, and anodized aluminum trims) and colors consisting of light beiges and tans. The southerly building wall of Building 1 which would be located along the Roscoe Boulevard frontage, extends for 373 feet, and is modulated (broken up) into eight segments with a combination of four glass building entrances and four building segments/exterior wall panels, each of which are separated by either an eldorado stone vertical component or the blue non-reflective glass entryways into each building section. As a result, the design of this building elevation provides a high-quality modern design that enhances the view of the Subject Property from public vantage points along Roscoe Boulevard and serves as a high-quality corner component of the immediate neighborhood. Buildings 2 and 3 are similarly designed to enhance the exposure of the Subject Property from public vantage points along Fallbrook Avenue. Exterior lighting will consist of wall-mounted LED fixtures on the buildings that are downfacing with cut off shields where necessary to prevent light spillover onto adjacent properties.

² Psomas, Tree Inventory Report for the Fallbrook Point Project Site, West Hills, California, August 16, 2021.



Source: HPA Architecture, July 16, 2021.



North Elevation



West Elevation

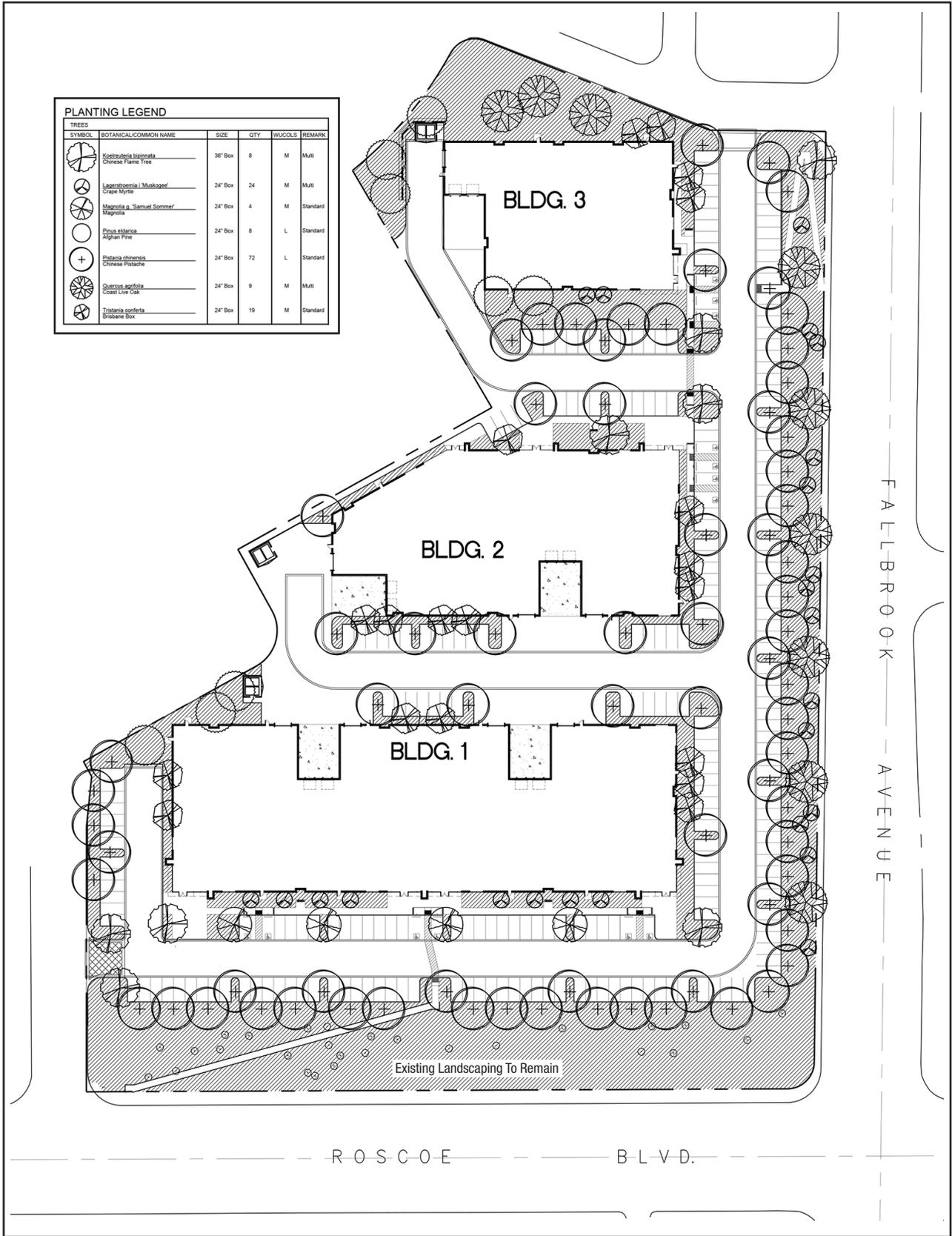


East Elevation



South Elevation

Source: HPA Architecture, April 7, 2021.



Source: Hunter Landscape, July 29, 2021.

SETBACKS AND LANDSCAPING

The proposed buildings are setback approximately 103 feet from the easterly property line along Fallbrook Avenue, and approximately 146 feet from the southerly property line along Roscoe Boulevard, which would exceed the minimum 40-foot setbacks required by Ordinance No. 180,844, with parking areas and landscape buffers between the buildings and project boundaries along the roadway frontages.

As depicted in Figure 3-6, an approximately 27-foot wide landscape buffer incorporating 47 trees complimented with shrubs and ground covers would be provided along the Fallbrook Avenue frontage, and an approximately 65-foot wide landscape buffer incorporating a total of 52 trees (20 new trees and 32 existing trees to be retained) complimented with shrubs and ground covers would be provided along the Roscoe Boulevard frontage. Additionally, pursuant to Condition No. 6 of CPC 2007-237-ZC-GPA-CU-SPR, the Project would provide shade trees within the parking area consisting of 24-inch box size trees that are a minimum of eight feet in height at the time of planting and would be expected to reach 20-30 feet in height with a minimum tree canopy diameter of 50 percent of its height at maturity. A combined total of 176 trees would be planted or retained within the property.

SUSTAINABILITY FEATURES

The Project would be required to comply with CalGreen and would be designed to meet Leadership in Energy and Environmental Design (LEED) standards or equivalent for energy efficiency. The warehouse structures would be designed to meet or exceed the most currently adopted California Code of Regulations Title 24 Part 6, as well as the Los Angeles Green Building Code by incorporating Project Design Features (PDFs) that target sustainable site development, implement energy efficient building designs, reduce indoor and outdoor water demand, incorporate green-oriented materials selection, and improve indoor environmental quality. These PDFs to be incorporated are consistent with and promote the City's Green LA Plan and the Sustainable City pLAN. Such PDFs include but are not limited to the following:

- Solar-ready for future rooftop solar installation or other renewable energy power system to offset the expected house meter and office electrical consumption of the tenant.
- A minimum of ten percent of the new parking spaces as Preferential Parking for High Occupancy Vehicle (HOV) carpool, commuter, or vanpool spaces.
- Provisions for future electric charging stalls for electric vehicles (EVs).
- All truck loading docks would be EV-ready.
- The Project would implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles.
- The Project is located in close proximity to public transit located on the southeast corner of Fallbrook and Roscoe.
- A total of 15 short-term and 17 long-term bicycle parking racks/lockers are provided, pursuant to LAMC Section 12.21A.16(a)(1)(i).
- On-site amenities such as an employee break area with a trellis in close proximity to the Project area.

SITE ACCESS

Access from public roadways to the Site would be via two existing driveways that access the Corporate Pointe West Hills Business Park from Roscoe Boulevard and Fallbrook Avenue at the western and northern boundaries of the Project Site, respectively. From the Business Park, the Project Site would continue to be accessed from the existing driveways along the western and northern boundaries, as well as existing parking lot aisles that extend into the Project Site from the adjacent use to the west (see Figure 3-4). Consistent with Case No. CPC 2007-237-ZC-GPA-CU-SPR, Condition of Approval No. B.3 for the Commercial Corner Exceptions, truck deliveries and distribution would be restricted to 6 AM to 7 PM on Monday through Friday, 7 AM to 5 PM on Saturday, and 10 AM to 4 PM on Sunday. This condition also requires that access

to and egress from the Project Site for truck deliveries/distribution (for trucks with three or more axels that are greater than 10,000 pounds in gross vehicle weight) should be taken primarily from the Roscoe Boulevard entrance.

PARKING LOT REMOVAL

The existing parking lot on the Project Site that is to be removed was previously part of a Covenant and Agreement to provide off-site parking to serve a DeVry University that occupied the two-story building located on the adjacent property to the west of the Project Site. That building was the subject of a Change of Use (Building Permit No. 16016-0000-28343) from college to medical research office, which required substantially reduced parking than that required for the college. As a result, use of the existing building on the adjacent property no longer required off-site parking spaces to meet its parking needs, and the Covenant and Agreement regarding use of the Project Site for off-site parking was terminated. As discussed above, the Project would create new parking spaces to meet its own off-street parking needs by providing a total of 262 vehicle parking spaces distributed throughout the property, which exceeds the 150 off-street parking spaces required per Code (LAMC Section 12.21A.4).

CONSTRUCTION AND EARTHWORK

Construction activities are anticipated to begin in the final quarter of 2022 and are projected to be completed in 2023. The Project would require import of approximately 6,000 cubic yards of soil materials during grading.³ A conceptual construction equipment fleet and duration of activities to accomplish construction of the Project is provided in **Table 3-1, Construction Activities and Equipment**. Although the Project would only import approximately 6,000 cubic yards of soil, the following analyses of construction-related emissions and fuel use are conservatively evaluated assuming import of approximately 10,500 cubic yards of soil materials would be needed based on a previous grading study.⁴ As such, construction emissions and fuel use are conservatively overestimated, and the Project's actual effects would be somewhat less.

REQUIRED APPROVALS

Project implementation would require City approval of the following entitlement requests:

1. Site Plan Review pursuant to LAMC Section 16.05, for the addition of greater than 50,000 SF of new commercial Floor Area.

³ Rosenheim & Associates, Inc. (Heather Waldstein), Email communication with Envicom Corporation, October 22, 2021.

⁴ Psomas, Grading and Over-Ex Study Staley Point Capital Fallbrook Point Project, April 29, 2021.

Table 3-1
Construction Activities and Equipment

Construction Phase	Duration ^(a)	Equipment Type and Quantity
Demolition	20	1 Excavator
		1 Loader
		1 Concrete Saw
		2 Dozers
Site Preparation	10	1 Dozer
		2 Tractor/Loader/Backhoe
Grading and Soil Import	20	1 Grader
		1 Dozer
		1 Excavator
		1 Loader
		3 Tractor/Loader/Backhoe
Building Construction	230	1 Crane
		3 Forklift
		1 Generator Set
		1 Welder
		3 Tractor/Loader/Backhoe
Paving	20	2 Paver
		2 Paving Equipment
		2 Roller
Architectural Coating/Painting	20	1 Air Compressor
Source: CalEEMod output sheets provided in Appendix A.		
^(a) Durations and equipment pieces are conceptually based on the size of the Site and proposed structures.		

4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: Fallbrook Point	ENVIRONMENTAL CASE NO: ENV-2021-10328-MND	RELATED CASES: ENV-2019-7508-CE ENV-2006-10437-MND CPC-2007-237-GPA-ZC-CU-SPR DIR-2016-317-ACI-CLQ DIR-2017-2024-ACI-CLQ DIR-2019-7507-ACI-CLQ
PROJECT LOCATION: 22815-22825 W. Roscoe Boulevard, Los Angeles CA, 91304		
COMMUNITY PLAN AREA: Chatsworth - Porter Ranch	COUNCIL DISTRICT: CD 12 - John Lee	AREA PLANNING COMMISSION: North Valley
EXISTING ZONING: [T][Q]M1-1	GENERAL PLAN LAND USE: Limited Industrial	
LEAD CITY AGENCY: City of Los Angeles	ADDRESS: 201 N. Figueroa Street, 4th Floor, Los Angeles, California 90012	
STAFF CONTACT: Esther Ahn, City Planner	TELEPHONE: (213) 978-1486	
APPLICANT NAME AND ADDRESS: Staley Point Capital 11150 Santa Monica Blvd, Suite 700 Los Angeles, CA 90025		
PROJECT DESCRIPTION: The Project would construct three warehouse/manufacturing buildings with a total floor area of 98,614 square feet on a 6.99-acre property currently occupied by a parking lot associated with the Corporate Pointe West Hills Business Park. Approximately 23,500 square feet of the total floor area would be for potential office use, 19,000 square feet would be for manufacturing use, and 56,114 square feet would be for warehouse use. The Project would provide 262 paved parking spaces, and a total of 10 truck docks would be provided.		
ENVIRONMENTAL SETTING: The Project Site is located within an urbanized area and surrounded by existing business park uses to the north and west, and single-family residences to the south and east.		
OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:		
CALIFORNIA NATIVE AMERICAN CONSULTATION REQUESTED: Yes. A request for consultation was received on 2/9/2022		

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology /Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, an EIR Addendum will be prepared.

Name: Esther Ahn
Title: City Planner, City of Los Angeles

Signature: _____

Date: _____

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS.

Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a-d. Less Than Significant Impact. The Project proposes to redevelop the 6.99-acre Site that is currently occupied by an existing parking lot (see Figure 3-3B) in an urbanized area of the City within the Corporate Pointe West Hills Business Park. The Project Site is currently surrounded by existing development consisting of light industrial buildings to the north and west, and single-family residences to the south and east, as seen in Figure 3-2. Most of the existing parking lot is not generally visible from Roscoe Boulevard and Fallbrook Avenue as the surface lot elevation is approximately eight to ten feet higher than the elevations of the adjacent roadways, and existing landscaping trees are provided along the frontages with those roadways (see Figure 3-3A).

The Project would construct three tilt-up concrete buildings for warehouse and manufacturing uses, with ancillary office space. As shown in Figure 3-4, the largest of the three proposed structures would be located within the southern portion of the Site and would have approximately 49,892 square feet of floor space. The other two proposed structures would include a building with approximately 31,169 square feet of floor space, and a building with approximately 17,553 square feet of floor space, with the smaller of the buildings located along the northern property boundary. All three proposed buildings would be approximately 37 feet high, and the floor space area for each building includes first and second floor levels of ancillary office space as well as the manufacturing and warehouse space. The internal circulation driveway would include parking spaces along the Site perimeter and the perimeters of the proposed structures. The proposed structures would have exterior finishes of neutral earth-tone colors as depicted in the representative architectural elevations shown in Figure 3-5.

Zoning Conditions

The Project Site is in the [T][Q]M1-1 Zone. The proposed Project would carry out the final phase of development of the Corporate Pointe at West Hills office/industrial campus, which the City originally approved in 2009 pursuant to Ordinance No. 180,844 and associated City Planning Case No. CPC-2007-237-ZC-GPA-CU-SPR. In April 2020, the City approved Case No. DIR-2019-7507-ACI-CLQ which modified the [T] and [Q] Conditions applicable to the Project Site, including allowed uses, maximum square footage and height, setback distance, and other requirements. Ordinance 180,844 also requires that development of the Site comply with the following [Q] Environmental Conditions associated with aesthetics:

1. Grading shall be kept to a minimum.
2. Natural features, such as prominent knolls or ridge lines, shall be preserved.
3. The project shall comply with the City's Hillside Development Guidelines.
4. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Urban Design Studio of the Department of City Planning. The applicant shall provide a copy of the Urban Design Studio approved plans to the West Hills Neighborhood Council.

The Project would be required to comply with zoning provisions pertaining to scenic quality such as the applicable [Q] environmental conditions, as well as allowable floor area, height, setback, and landscaping requirements.

Citywide Design Guidelines

The proposed Project provides safe pedestrian accessibility to accommodate persons of all mobility levels. Pedestrian pathways extend up through the landscape buffers along the street frontages (Roscoe Boulevard and Fallbrook Avenue) and are clearly separated from planter areas with a raised curb and clearly striped for safety when crossing driveway aisles. Vehicular access to the Site is provided by two existing driveways entrances/exits, one each to Roscoe Boulevard and Fallbrook Avenue. Loading areas for each building are clearly identified and separated from pedestrian access paths and vehicle parking to minimize interference with both. The Subject Property's frontages along Roscoe Boulevard and Fallbrook Avenue are improved with wide landscaped planters improved with existing and new trees and shrubs.

The proposed buildings are setback more than 103-feet from the street frontages and separated from nearby residential properties to the south and east with parking areas and landscape buffers. The building design includes a variety of materials and colors and incorporate vertical modulations that create smaller wall segments with a combination of four glass building entrances and four building segments/exterior wall panels, each of which are separated by either an eldorado stone vertical component or the blue non-reflective glass entryways into each building section. The proposed buildings are sited closer to the commercial buildings of the Business Park and further away from residential properties to the south and east, thus minimizing disruption to nearby residents. The color palette for the buildings is primarily earth tones to compliment the nearby residential properties; and the buildings mass and designs are consistent with the modern style architecture consistent with the commercial buildings to the north and west.

In all, the proposed Project is consistent with best practices suggested in the Citywide Design Guidelines, including Pedestrian-First Design, 360 Degree Design and Climate-Adapted Design.

Architectural Features

All three buildings share the same architectural features which are a modern-contemporary industrial concrete tilt-up design utilizing a combination of materials (stucco, eldorado stone, blue non-reflective glazing, and anodized aluminum trims) and colors consisting of light beiges and tans. The southerly building wall of Building 1 which would be located along the Roscoe Boulevard frontage, extends for 373 feet, and is modulated (broken up) into eight segments with a combination of four glass building entrances and four building segments/exterior wall panels, each of which are separated by either an eldorado stone vertical component or the blue non-reflective glass entryways into each building section. As a result, the design of this building elevation provides a high-quality modern design that enhances the view of the Subject Property from public vantage points along Roscoe Boulevard and serves as a high-quality corner component of the immediate neighborhood. Buildings 2 and 3 are similarly designed to enhance the exposure of the Subject Property from public vantage points along Fallbrook Avenue. In addition, truck bays would be located within the interior of the Site positioned to face other proposed buildings and not face the exterior of the Site, reducing visibility of truck dock bays from existing residential uses in the vicinity.

The proposed buildings are setback approximately 103 feet from the easterly property line along Fallbrook Avenue, and approximately 146 feet from the southerly property line along Roscoe Boulevard, which would exceed the minimum 40-foot setbacks required by Ordinance No. 180,844, with parking areas and landscape buffers between the buildings and project boundaries along the roadway frontages. An approximately 27-foot wide landscape buffer incorporating 47 trees complimented with shrubs and ground covers would be provided along the Fallbrook Avenue frontage, and an approximately 65-foot wide landscape buffer incorporating a total of 52 trees (20 new trees and 32 existing trees to be retained) complimented with shrubs and ground covers would be provided along the Roscoe Boulevard frontage. Additionally, pursuant to Condition No. 6 of CPC 2007-237-ZC-GPA-CU-SPR, the Project would provide shade trees within the parking area consisting of 24-inch box size trees that are a minimum of eight feet in height at the time of planting and would be expected to reach 20-30 feet in height with a minimum tree canopy diameter of 50 percent of its height at maturity. A combined total of 176 trees would be planted or retained within the property.

Lighting and Glare

Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include streetlights, vehicle headlights, and interior and exterior building illumination. The existing parking lot currently features pole-mounted lighting typical of the adjacent parking lots associated with other uses within the Corporate Pointe West Hills Business Park. The Project would remove the existing pole-mounted lights from the Project Site, and would install wall-mounted LED fixtures on the proposed buildings that are downfacing with cut off shields where necessary to prevent light spillover onto adjacent properties as required by LAMC Section 93.0117. In addition, the proposed buildings and lighting fixtures would be setback approximately 103 feet from the easterly property line along Fallbrook Avenue, and approximately 146 feet from the southerly property line along Roscoe Boulevard, which would exceed the minimum 40-foot setbacks required by [Q] Conditions of Ordinance No. 180,844. Landscape buffers with planted and retained trees along roadway frontages would provide screening of the Project's light sources from spillover

onto adjacent properties, and a 3-foot perimeter wall would be installed along the eastern and southern edges of the proposed parking area to shield offsite uses from onsite vehicle headlights.

The project would include limited commercial glass areas which would limit glare and would also use low glare and blue non-reflective glazing to provide daylight for building users. The proposed project does not include any elements or features that would create substantial new sources of glare.

Scenic Highways

The nearest officially designated Scenic Highway is a 2.5 mile segment of CA Route 27 (Topanga Canyon Boulevard) located at a distance of approximately 9.8 miles to the south of the Project Site. The nearest roadways listed as eligible Scenic Highways are the CA 118 Freeway and the US 101 Freeway, located at distances of approximately 3.5 miles from the Project Site to the north and south, respectively. A portion of CA Route 27 located approximately 4.8 miles south of the Project Site is also listed as eligible. None of the eligible or officially designated Scenic Highways are within view of the Project Site due to distance and intervening topography.

Aesthetic Effects Summary

The Project complies with applicable zoning provisions pertaining to scenic quality including allowable uses, square footage, height, setbacks, tree plantings, and environmental [Q] conditions pursuant to Ordinance 180,844 regarding aesthetics, as detailed above. The Project's redevelopment of the existing parking lot with the proposed warehouse/manufacturing use buildings would not substantially affect scenic public vistas, would not substantially damage existing scenic resources and would plant replacement trees, would not substantially degrade the existing visual character or quality of public views of the Site and its surroundings, and would remove existing pole-mounted parking lot lighting and incorporate shielded exterior lighting fixtures to meet City requirements. As such, potential aesthetic impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FORESTRY RESOURCES.

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Analysis

a-c. No Impact. The Project Site is located within an urbanized area of the San Fernando Valley, which has been developed for decades and is zoned for light industrial uses. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) 2016 map of Los Angeles County Important Farmland⁵ indicates the Project Site consists of “urban and built-up land” and does not designate the Project Site or surrounding properties as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would have no impact on agriculture or forestry resources, and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

⁵ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2016. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY.

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The Project Site is located in an urban area of the western San Fernando Valley in the City’s Chatsworth - Porter Ranch Community Plan Area, which is situated within the South Coast Air Basin (“Air Basin”). The Air Basin is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and San Diego County to the south. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating stationary sources of emissions in the Air Basin.

In addition to being a highly developed metropolitan region with a large population, the Air Basin’s prevailing climate often includes light winds, shallow vertical mixing, and extensive sunlight, as well as the adjacent mountain ranges which hinder dispersion of air pollutants, can result in degraded air quality within the Air Basin.

The Project’s estimated construction emissions were modeled using the California Emissions estimator Model (CalEEMod.2016.3.2), a statewide land use emissions computer model developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with a variety of land use projects. The output reports from CalEEMod are included as **Appendix A**. Although the construction activities that have been modeled using CalEEMod included import of approximately 10,500 cubic yards of soil, a revised grading plan determined that soils would generally be balanced onsite, and the Project would require import of only approximately 6,000 cubic yards of soil. As such, the following analysis conservatively overestimates construction activity emissions, and actual emissions would be even lower than those evaluated below.

a. Less Than Significant Impact. A significant air quality impact could occur if the Project would conflict with or obstruct implementation of the applicable air quality plan.

In the Air Basin, the agencies designated to develop the regional AQMP are the SCAQMD and the Southern California Association of Governments (SCAG). The SCAQMD 2016 Air Quality Management Plan

(AQMP) is a regional blueprint for achieving federal air quality standards and healthful air, and includes integrated strategies and measures needed to meet the National Ambient Air Quality Standards (NAAQS) within the Air Basin, within which the Project Site is located. The AQMP focuses on achieving clean air standards while accommodating population growth as forecast by the SCAG. The AQMP is developed through use of the planning forecasts provided in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Federal Transportation Improvement Program (FTIP). The RTP/SCS is a major planning document for the regional transportation and land use network within Southern California. The RTP/SCS is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to align their local general plans with these regional plans, and this includes participating in the growth forecasts developed for the RTP/SCS to reflect the land use assumptions in the local general plans. For the proposed Project, the City of Los Angeles General Plan's Land Use Plan defines the long range land use assumptions that are represented in the AQMP. The Project Site is currently designated as Limited Industrial in both the General Plan and the Los Angeles Zoning Code. The proposed warehouse/manufacturing facility and ancillary office use are allowed uses in the Limited Industrial land use designation. The Project's proposed warehouse and manufacturing uses with ancillary office space would not generate a substantial increase in regional population or employment growth, as discussed in Section XIV, Population and Housing, and it does not meet the criteria for statewide, regional, or areawide significance as defined in the CEQA Statute and Guidelines Section 15206. As such, the Project is consistent with the current land use designation and would not conflict with AQMP assumptions for regional growth.

The 2016 AQMP includes the following objectives:

- Eliminate reliance on future technologies measures (to show future attainment of air quality standards) to the maximum extent feasible.
- Calculate and take credit for co-benefits from other planning efforts.
- Develop a strategy with fair-share emission reductions at the federal, state, and local levels.
- Invest in strategies and technologies meeting multiple objectives regarding air quality, climate change, air toxics exposure, energy, and transportation.
- Identify and secure significant funding for incentives to implement early deployment and commercialization of zero and near-zero emission technologies.
- Enhance the socioeconomic analysis and pursue the most efficient and cost-effective path to achieve multi-pollutant and multi-deadline targets.
- Prioritize enforceable regulatory measures as well as non-regulatory, innovative and “win-win” approaches for emission reductions.

These objectives are not project-specific guidelines, and the Project would not interfere with the SCAQMD efforts to achieve these stated objectives. The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.⁶

The 2016 overall control strategy is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and United

⁶ South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

States Environmental Protection Agency. In addition, the baseline emissions inventory in the AQMP incorporates transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT) that are included in the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Project Site is served by an existing bus stop (Metro 152/353) located at the Roscoe Boulevard/Fallbrook Avenue intersection and is located approximately 1,300 feet (0.25 mile) from a designated High Quality Transit Area (HQT⁷) identified by the RTP/SCS. The availability of nearby existing transit options would reduce the need for reliance on personal vehicle transportation for employees of the proposed infill development, consistent with the AQMP in terms of land use planning. The Project is required by the [T] conditions and City Code to implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles, and would provide a total of 15 short-term and 17 long-term bicycle parking racks/lockers pursuant to LAMC Section 12.21A.16(a)(1)(i). Additionally, the Project would be required to comply with CalGreen and would be designed to meet Leadership in Energy and Environmental Design (LEED) standards or equivalent for energy efficiency.

The warehouse structures would be designed to meet or exceed the most currently adopted California Code of Regulations Title 24 Part 6, as well as the Los Angeles Green Building Code by incorporating PDFs that target sustainable site development, implement energy efficient building designs, reduce indoor and outdoor water demand, incorporate green-oriented materials selection, and improve indoor environmental quality. These PDFs to be incorporated are consistent with and promote the City's Green LA Plan and the Sustainable City pLAN. Such PDFs include but are not limited to the following:

- Solar-ready for future rooftop solar installation or other renewable energy power system to offset the expected house meter and office electrical consumption of the tenant.
- A minimum of ten percent of the new parking spaces as Preferential Parking for HOV carpool, commuter, or vanpool spaces.
- Provisions for future electric charging stalls for EVs.
- All truck loading docks would be EV-ready.
- The Project would implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles.
- The Project is located in close proximity to public transit located on the southeast corner of Fallbrook and Roscoe.
- A total of 15 short-term and 17 long-term bicycle parking racks/lockers are provided, pursuant to LAMC Section 12.21A.16(a)(1)(i).
- On-site amenities such as an employee break area with a trellis in close proximity to the Project area.

SCAQMD has continued to adopt and implement regulatory measures in order to reduce air pollution emissions from a wide range of sources and to reduce public exposure to unhealthful air pollution. The 2016 AQMP proposes robust reductions for oxides of nitrogen oxide (NO_x) from new regulations on Regional Clean Air Incentives Market facilities (e.g., refineries, power plants, etc.), non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_x emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives. The 2016 AQMP strategies also include development of incentive funding to advance deployment of new cleaner technologies at a pace that is not feasible through regulation alone. The Project would be required to comply with all regulations regarding appliances and equipment that would be applicable to the proposed uses, including regulations that relate to energy conservation and/or emissions reduction of criteria pollutants.

⁷ Southern California Association of Governments (SCAG), High Quality Transit Areas (2016), Accessed on May 28, 2021, at: https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explore?

In addition, as discussed in the evaluation below, the Project's construction or operations activities would not result in emissions of criteria pollutants that exceed the SCAQMD's thresholds of significance. The proposed Project is also subject to the City's Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional, and global ecosystems. Therefore, the Project would not substantially affect conformance with the AQMP, nor would it obstruct its implementation; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A project may have a significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. SCAQMD provides significance thresholds for emissions of criteria pollutants, including reactive organic gases (ROG),⁸ NO_x, carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM-10 and PM-2.5)⁹. Projects in the SCAQMD with daily emissions that exceed any of the following emission thresholds shown in **Table III-1, SCAQMD Daily Maximum Emissions Thresholds**, may be considered significant under CEQA guidelines.

**Table III-1
SCAQMD Daily Maximum Emissions Thresholds**

Pollutant	Construction (lbs./day)	Operations (lbs./day)
ROG	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM-10	150	150
PM-2.5	55	55

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, Revision April 2019.

The SCAQMD guidance for evaluation of cumulative impacts under CEQA¹⁰ states that "As Lead Agency, the AQMD uses the same significance thresholds for project-specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR" (the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions is an exception). Further, the SCAQMD guidance states that "Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant." SCAQMD recommends that public agencies perform cumulative impact analyses for air quality in the same manner as SCAQMD. As such, a project that does not exceed the emissions thresholds shown in Table III-1 would not have a cumulatively considerable net increase of any criteria pollutant.

Construction Emissions

The Project's proposed construction activities would include the removal of the existing parking lot and construct three concrete tilt-up panel buildings and associated driveway/parking area. The proposed

⁸ Although ROG is not a criteria pollutant, it is a precursor for ozone (O₃) which is formed when ROG and NO_x react in the presence of sunlight in the atmosphere.

⁹ PM-10 and PM 2.5 refer to particulate matter of less than 10 microns and less than 2.5 microns, respectively.

¹⁰ South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution Appendix D, August 2003.

buildings would include approximately 23,500 square feet for potential office use, 19,000 square feet for manufacturing use, and 56,114 square feet for warehouse use. Although the Project would only import approximately 6,000 cubic yards of soil, the following analysis conservatively assumes import of approximately 10,500 cubic yards of soil materials would be needed based on a previous grading study.

During construction, emissions of air pollutants would be generated from the use of heavy equipment on-site, including exhaust from internal combustion engines and dust from earth moving activities, as well as transportation of worker personnel and materials to or from the Site. Dust emissions generated during construction are called “fugitive emissions,” because such emissions are not amenable to collection and discharge through a controlled source. SCAQMD Rule 403 provides regulatory dust control measures that would apply to the Project during construction, including applying water to exposed surfaces as needed to avoid visible dust leaving the construction area.

The Project’s maximum daily construction emissions as calculated by CalEEMod are shown in **Table III-2, Construction Activity Maximum Daily Emissions**. As the Project would be required to comply with SCAQMD Rule 403, Table III-2 shows construction emissions estimated with and without application of water to exposed soils twice daily for dust control purposes.

Table III-2
Construction Activity Maximum Daily Emissions

	Maximum Construction Emissions (lbs/day) ^a					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Without dust control	47.9	37.4	20.2	0.1	8.9	4.6
With dust control ^b	47.9	37.4	20.2	0.1	5.3	2.8
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod output sheets provided in Appendix A. Maximum emissions reported for summer or winter season, whichever is greater. ^a Proposed building square footages are slightly reduced from the total used to generate the CalEEMod outputs. ^b Application of water to exposed soils twice daily during grading to reduce dust for compliance with SCAQMD Rule 403.						

As shown in Table III-2, peak daily construction activity emissions of criteria air pollutants are estimated to be far below the SCAQMD thresholds of significance. Therefore, the Project’s potential to result in a cumulatively considerable net increase of any criteria pollutant during construction would be less than significant.

Although the Project’s fugitive dust emissions would be below SCAQMD thresholds during construction with or without application of water for dust control, the Project would be required to comply with SCAQMD Rule 403 and implement the [Q] Qualified Conditions of Approval Environmental Conditions #11 – #16 to reduce dust and other air pollutants during construction. The requirements of these [Q] conditions of approval are included here as **Regulatory Compliance Measure RC-AQ-1**.

Regulatory Compliance Measure RC-AQ-1: Construction Period Air Quality (Demolition, Grading, and Construction Activities)

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- All clearing, grading, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Required compliance with Regulatory Compliance Measure RC-AQ-1 would ensure the Project's potential result in a cumulatively considerable net increase of any criteria pollutant during construction would be less than significant.

Operational Emissions

The Project would generate emissions of criteria pollutants during the operations period, which would result from vehicle trips associated with the Project (mobile sources); emissions resulting from energy usage (energy sources); and the on-site use of consumer products, architectural coatings, and landscaping equipment (area sources). The primary source of Project-related emissions is attributed to mobile (vehicle) sources. The Project's maximum daily emissions of criteria pollutants during operations are shown in **Table III-3, Daily Operational Emissions**.

Table III-3
Daily Operational Emissions

Source	Operational Emissions (lbs./day) ^a					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	2.27	<0.01	0.04	<0.01	<0.01	<0.01
Energy	0.02	0.18	0.15	<0.01	0.01	0.01
Mobile	0.99	4.21	13.70	0.05	4.41	1.21
Total	3.28	4.39	13.89	0.05	4.43	1.22
AQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod output sheets provided in Appendix A.						
Maximum emissions reported for summer or winter season, whichever is greater.						
Totals may have minor discrepancies due to rounding.						
^a Proposed building square footages are slightly reduced from the total used to generate the CalEEMod outputs.						

As shown in Table III-3, the Project's operational emissions would be far below the SCAQMD maximum daily emission thresholds for criteria pollutants. Therefore, the Project's potential to result in a cumulatively considerable net increase of any criteria pollutant during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact may occur if a project would generate emissions that would expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are populations that are generally more susceptible to the effects of air pollution than the population at large. Land uses considered to be sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project would be existing residences that are located east of Fallbrook Avenue, approximately 100 feet (30 meters) from the Project boundary.

Local Significance Thresholds Impacts

The SCAQMD developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. According to SCAQMD guidance, the use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to the CEQA.¹¹

LST pollutant screening level concentration data is currently published for one, two and five-acre sites, with source-receptor distances of 25, 50, 100, 200, and 500 meters. As such, the applicable LST screening criteria for this Project would be for a five-acre site with a source-receptor distance of 25 meters. This evaluation is based on the estimated on-site daily construction emissions for the phase and year representing the highest daily emissions. Daily averages would be lower than the reported maximum amounts.

Table III-4, LST - Maximum On-site Construction Emissions, shows the relevant thresholds and the estimated peak daily on-site emissions during the construction phases that would generate the highest level of on-site emissions for each pollutant evaluated for LST impacts. The emissions shown in Table III-4 were calculated assuming the application of water to exposed soils twice daily for dust suppression as required for compliance with Site's [Q] Qualified Conditions of Approval Environmental Condition #11 and SCAQMD Rule 403, Fugitive Dust as discussed above within Regulatory Compliance Measure RC-AQ-1. The Site's [Q] Qualified Conditions of Approval Environmental Conditions #12 – #16, are also listed within RC-AQ-1, which would further reduce onsite generation of emissions and potential effects on sensitive uses.

Table III-4
LST - Maximum On-site Construction Emissions

LST 5 acre/25 meters W San Fernando Valley	Project LST Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum On-Site Emissions				
Without Dust Control	24.4	16.4	7.6	4.2
With Dust Control ^a	24.4	16.4	3.9	2.4
LST Threshold	221	1,158	11	6
Exceeds Threshold?	No	No	No	No
Source: CalEEMod output sheets provided in Appendix A. Maximum emissions reported for any construction phase in summer or winter season, whichever is greater. ^a Application of water to exposed soils twice daily during grading to reduce dust for compliance with SCAQMD Rule 403.				

As seen in Table III-4, the peak on-site emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, the Project's potential to generate emissions that would expose sensitive receptors to substantial pollutant concentrations would be less than significant.

¹¹ South Coast Air Quality Management District, Localized Significance Thresholds, Accessed at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, May 28, 2021.

Although the Project's fugitive dust emissions would be below SCAQMD LST screening criteria during construction with or without application of water for dust control, the Project would be required to implement appropriate dust control measures during construction in compliance with SCAQMD Rule 403 - Fugitive Dust described above as Regulatory Compliance Measure RC-AQ-1.

SCAQMD provides separate LST screening levels for long-term operations for onsite (non-mobile) PM₁₀, and PM_{2.5} emissions.¹² **Table III-5, LST - Maximum On-site Operations Emissions**, shows the relevant LST thresholds and the estimated peak daily onsite emissions during operations.¹³ As seen in Table III-5, the peak onsite emissions would not exceed the applicable SCAQMD LSTs, and impacts would be less than significant.

Table III-5
LST - Maximum On-site Operations Emissions

LST 5 acre/25 meters W San Fernando Valley	On-site Emissions (pounds/day) ^a			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum On-Site Emissions ^b	0.18	0.19	0.01	0.01
LST Threshold	221	1,158	3	2
Exceeds Threshold?	No	No	No	No
Source: CalEEMod output sheets provided in Appendix A.				
^a Proposed building square footages are slightly reduced from the total used to generate the CalEEMod outputs.				
^b Area and Energy Use Sources				

As seen in Table III-4 and III-5, the peak on-site emissions during construction and operations would not exceed the applicable SCAQMD LSTs, and as such, the Project's potential to generate emissions that would expose sensitive receptors to substantial pollutant concentrations would be less than significant.

Warehouse Indirect Source Rule

Based on information from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition Supplement¹⁴ and the square footage of proposed warehouse, manufacturing, and office uses, the Project would generate approximately 45 one-way truck trips per day, which is approximately nine percent of the Project's total of 477 daily trips. Assuming an equal number of arrivals and departures (rounded to an even number), these one-way truck trips would be associated with approximately 23 individual trucks accessing and then leaving the Site per day, or an average of three individual trucks per hour in an eight-hour workday. Pursuant to the California Code of Regulations Title 13 Section 2485, these trucks that may access the Project would be prohibited from idling for more than 5 minutes on the Site.

On May 7, 2021, the South Coast Air Quality Management District (South Coast AQMD) Governing Board adopted Rule 2305 otherwise known as the Warehouse Indirect Source Rule. The rule requires warehouses greater than 100,000 square feet to directly reduce NO_x and diesel particulate matter (PM) emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. As the proposed warehouse use would be approximately 53,614 square feet, this Project would not be subject to Rule 2305 requirements.

Mitigation Measures: No mitigation measures are required.

¹² SCAQMD LST for NO_x and CO are the same for construction activities and operations.

¹³ Mobile source emissions calculated by CalEEMod predominantly comprise emissions generated on roadways and thus do not represent substantial concentrated emission levels affecting receptors adjacent to the site.

¹⁴ Linscott, Law, & Greenspan, email correspondence to Envicom, June 3, 2021.

d. Less Than Significant Impact. A significant impact may occur if a project would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Substantial odors are typically associated with land uses such as sewage treatment facilities, landfills, and agricultural facilities. As the Project involves no such land uses or types of activities, no odors from these types of uses or activities would occur.

SCAQMD's rules for odor compliance are mandated under the California Health and Safety Code, Section 41700, and they are also addressed in SCAQMD Rule 402. This rule on Public Nuisance states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals."

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes, paving, or other construction activities may produce discernible odors typical of most construction sites. Such odors would be temporary based on the limited duration of each construction phase. As such, the Project's potential to emit objectionable odors affecting a substantial number of people during construction would be less than significant.

The Project design includes enclosures for covered trash and recycling bins for each of the proposed buildings, that would be located along the western side of the Site, which would be emptied regularly by a contracted pick up and disposal service. As such, the Project's potential to emit objectionable odors affecting a substantial number of people during operation would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES.

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This assessment evaluates biological resources potentially subject to ground or vegetation disturbance by the proposed Project. The Project Site is located within an urbanized area of the City and is surrounded by existing land uses consisting of adjacent light industrial and commercial uses, and single-family housing along Roscoe Boulevard and Fallbrook Avenue. The Project Site is currently developed with a parking lot and landscaping in planters between the parking rows and along the roadway frontages. The Project would construct three light industrial buildings and associated parking areas that would primarily be located within the footprint of the existing parking lot.

a. Less Than Significant Impact. A significant impact could occur if a project would result in a substantial adverse effect on any species identified as a candidate, sensitive or special-status species in local

or regional plans. The infill Project Site is located within the Corporate Pointe West Hills Business Park area of the Chatsworth-Porter Ranch Plan Area of the City and is currently occupied by a parking lot.

The Project Site and surrounding area is developed and has been urbanized for decades. Impacts to biological resources would be limited to the removal of landscape vegetation (e.g., ornamental trees and shrubs). Natural habitats would not be affected by the Project, and no impacts on federally or state-listed species would occur.

Common wildlife, particularly birds, may be exposed to noise and other disturbance during construction, but these activities are typical of urban environments and species that may be likely to occur within the Site under the existing conditions would be those that are typically acclimated to these types of disturbance. Populations of common bird species, including migratory birds, are typically stable, and the loss of individuals would not substantially affect the species' population.

The Project would remove existing trees and shrubs from the Site, which if conducted during the nesting bird season (February 1 to August 31, but as early as February 1 for raptors), would have the potential to result in impacts to active bird nests, if present. Migratory non-game native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50 of the Code of Federal Regulations, or C.F.R., Section 10.13, List of Migratory Birds). Consistent with the MBTA, Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA). A nesting bird survey of the onsite trees and shrubs conducted prior to their removal, if such activities would occur during the nesting season, and observance of relevant buffer distances around active nests if present, would ensure compliance with the MTBA and the related California Fish and Game Code Sections.

The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #7 Nesting Native Birds, included here as **Regulatory Compliance Measure RC-BIO-1**.

Regulatory Compliance Measure RC-BIO-1: Nesting Native Birds

- The Project would result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat the applicant shall: Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and

construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

Required compliance with Regulatory Compliance Measure RC-BIO-1 would provide protections for potential nesting birds to comply with existing applicable regulations, including the Federal MBTA and California Fish and Game Code. Therefore, the Project's potential to result in a substantial adverse effect on any species identified as a candidate, sensitive or special-status species in local or regional plans would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact could occur if a project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or the U.S. Fish and Wildlife Service (USFWS).

The Project Site and surrounding properties are located within a previously developed and urbanized area, and the Project Site does not include any natural communities such as riparian habitat, coastal sage scrub, oak woodlands, or wetlands. Additionally, the Project Site is not located within a Significant Ecological Area (SEA) designated by the County.¹⁵

The Project Site is currently developed with a surface parking lot, and surrounding properties are developed with light industrial uses, parking lots, and single-family neighborhoods. Therefore, the Project would have no impact on sensitive natural communities.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A significant impact could occur if a project has a substantial adverse effect on federally protected wetlands or waters of the U.S. According to the USFWS National Wetlands Mapper, no natural wetlands are located within the Project Site.¹⁶ As the Project Site is urbanized and not located within any natural wetlands marshes, vernal pools, or waters of the U.S., the Project would not remove or otherwise impair such areas and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact could occur if a project would substantially interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. The Site is not within an area identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor.¹⁷ The urbanized Site is located within a larger business park development that is bounded on the south and east by arterial roadways consisting of Roscoe Boulevard and Fallbrook Avenue,

¹⁵ County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Adopted October 6, 2015.

¹⁶ USFWS, National Wetlands Inventory, Surface Water and Wetlands, Accessed on May 27, 2021, at: <https://www.fws.gov/wetlands/data/mapper.HTML>.

¹⁷ County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.2, Regional Habitat Linkages, Adopted October 6, 2015.

respectively.¹⁸ The Roscoe Boulevard segment along the Project boundary is designated as a Boulevard II (Major Highway Class II) roadway, and the Fallbrook Avenue segment along the Project boundary is designated as an Avenue II (Secondary Highway). Due to previous development of the Site and the surrounding urban environment, the Project Site does not contain physical connections that allow wildlife to move between areas of suitable habitat, and thus the Project would not be located within a wildlife corridor. As the Project Site is not located within a wildlife corridor, the Project would not substantially interfere with migratory corridors or impede wildlife movement and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

e. Less Than Significant Impact. A significant adverse effect could occur if a project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. According to the Project's Tree Inventory Report¹⁹ (**Appendix B**), there are no native trees within the Site or adjacent to it that would be subject to the City's Protected Tree Ordinance,²⁰ and there are no trees located within the public right-of-way that would be subject to street tree replacement conditions set forth by the Board of Public Works.

Of the existing 163 non-protected landscaping trees within or adjacent to the Site, the Project would remove a total of 131 trees (one of which is in very poor health) and retain a total of 32 trees.²¹ The Project's preliminary landscaping plan (Figure 3-6) indicates that a total of 144 trees of 24-inch box size or larger would be planted on the Site. Including retained existing trees and planted trees, the Project Site would have a total of 176 trees, exceeding the existing quantity.

The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #9 regarding non-protected tree removals and planting,²² included here as **Regulatory Compliance Measure RC-BIO-2**.

Regulatory Compliance Measure RC-BIO-2: Tree Removal

- Prior to the issuance of a grading permit or building permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the Site shall be submitted for approval by the decision maker and the Urban Forestry Division of the Bureau of Street Services. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the Site, on a 1:1 basis, shall be required for the unavoidable loss of desirable trees on the Site, and to the satisfaction of the Urban Forestry Division of the Bureau of Street Services and the decision maker. The genus or genera of the tree(s) shall provide a minimum crown of 30'- 50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No. 170,978), Guidelines K - Vehicular Use Areas. Note: Removal of all trees in the public right-of-way shall require approval of the Board of Public Works. Contact: Urban Forestry Division at: 213-847-3077.

As the Project would remove 131 non-protected trees, and would plant a total of 144 trees, the number of trees provided would exceed a 1:1 replacement ratio, consistent with the [Q] Qualified Conditions of

¹⁸ City of Los Angeles Bureau of Engineering Department of Public Works, NavigateLA, Accessed on May 27, 2021 at: <https://navigatea.lacity.org/navigatea/>.

¹⁹ Psomas, Tree Inventory Report for the Fallbrook Point Project Site, West Hills, California, August 16, 2021.

²⁰ City of Los Angeles, Los Angeles Tree Ordinance (No. 177404), LAMC, Sec. 12.21.

²¹ Psomas, Tree Inventory Report for the Fallbrook Point Project Site, West Hills, California, August 16, 2021.

²² As there are no Protected Trees located within the site, the [Q] Qualified Conditions of Approval Environmental Condition #8 would not be applicable for this Project.

Approval Environmental Condition #9. Implementation of RC-BIO-2 would ensure that the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. No Impact. A significant impact could occur if a project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Thus, the Project would result in no impact related to potential conflicts with the provisions of such plans.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Cause a substantial adverse change in significance of a historical resource pursuant in CEQA Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

On May 14, 2021, Envicom Corporation completed a Phase I Cultural Resource Assessment of the Project Site to identify any known cultural resources previously recorded within or immediately adjacent to the proposed Project Site. The study included a cultural resource record search conducted by the South Central Coastal Information Center (SCCIC), a request for the Native American Heritage Commission (NAHC) to conduct a record search for Native American cultural resources, and a pedestrian survey of the Site. These record searches examined the Project Site plus a 0.25-mile “study area” around the Project Site, to assess the overall cultural resource sensitivity of the Project region. Additional databases that were examined during the Phase I Cultural Resource Assessment included historic regional maps, historic U.S. Geological Survey maps, and historic Google Earth images. The University of California Santa Barbara Library Historic Aerial Photograph Database was also examined for images that included the Project Site. The Phase I Cultural Resource Assessment is provided in **Appendix C**.

a. Less Than Significant Impact. A project could have a significant impact if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064. The Project Site is part of a business park and is developed as a parking lot. There are no structures within the Project development footprint, and the most adjacent structure to the west was built in 1999.

The record search findings obtained at the SCCIC were negative for cultural resources within and adjacent to the Project property. Two resources were identified within the 0.25-mile study area, consisting of a cultural resource assessment for a Cingular wireless facility, and an archaeological monitor report for the Valley Communications Dispatch Center. The Phase I Cultural Resource Assessment determined that these reports did not contain any cultural resource issues relevant to the Project.

Neither the business park nor any of the buildings within it are designated as historic resources, and neither have they been identified as eligible for listing by the SurveyLA citywide historic resources survey, according to Historic Places LA.²³ A property occupied by a fire station at 23004 W. Roscoe Boulevard, which is located across the street from the business park at the intersection of Roscoe Blvd. and Lena Ave., is identified as eligible for listing at Historic Places LA but is not a designated resource. Regardless, the Project development footprint is roughly 900’ from the resource, and development of the Project would not affect it in any manner. Although there are some buildings within the business park that date from 1959,

²³ City of Los Angeles, Historic Places LA Los Angeles Historic Resources Inventory, Accessed May 4, 2021, at: <http://historicplacesla.org/map>

the majority are built during or after the 1980s, with multiple structures built in the 2000s. The continuing development of the business park would indicate there is no potential for the park at-large to constitute an historic district.

The findings of the Phase I Cultural Resource Assessment and review of the City's citywide historic resource survey indicate that potential impacts via a substantial adverse change in the significance of a historical resource through development of the Project are less than significant. The field survey of the Site confirmed there was no opportunity for surface historic resources at the Site. Although the Site does not have potential for older historic resources buried below the surface of the asphalt, proper handling of any inadvertent discovery of cultural resources during grading or excavation would be addressed with standard regulatory measures and would not require mitigation, as explained below in Section V(b).

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines criteria for historical resources or resources that constitute unique archaeological resources.

The Phase I Cultural Resource Assessment review of historic maps and aerial images did not show any indication of development activity within the Project development footprint prior to the 1940s. Therefore, there is little potential for the Site to contain any buried older historic cultural resources. The NAHC record search also returned negative findings, and it was indicated the Project was not within an area that is considered sensitive for cultural resources. As mentioned above in Section V(a) the SCCIC records search was also negative for any previously recorded archaeological and historic archaeological resources, or previously conducted archaeological investigations or studies relevant to the Project Site.

The geotechnical report indicates that 10 to 12 feet of fill underlies the Project Site from previous development of the business park. Due to this previous development archaeological resources that may have existed near the surface are likely to have been disturbed or previously removed. It is unlikely excavations would be deeper, or significantly deeper, than previous excavations, and therefore unlikely that any unknown archaeological resources may be uncovered. However, if previously unknown archaeological resources are found during excavation, the Project would be required to follow procedures detailed in California Public Resources Code Section (PRC) 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 21083.2. In addition, the Project would be required to implement the City's Regulatory Compliance Measure RC-CR-1, which would ensure that if any such resources are found during construction, they would be evaluated and handled according to the proper regulations. Therefore, Project impacts to archaeological resources would be less than significant.

Regulatory Compliance Measure RC-CR-1: Archaeological Resources

- If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a Qualified Archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact could occur if grading or excavation activities associated with a project disturbed previously interred human remains.

No known human burials have been identified on the Project Site or its vicinity and the negative results from the SCCIC and NAHC would suggest a low probability any would be encountered. However, it is always possible that unknown human remains could be uncovered during excavation activity. If human remains are encountered unexpectedly during demolition, grading, and/or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. The Project would be required to comply with **Regulatory Compliance Measure RC-CR-4 (Human Remains)**, which would ensure potential impacts related to the disturbance of unknown human remains would be less than significant.

Regulatory Compliance Measure RC-CR-4: Human Remains

- If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
 - If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
 - The NAHC shall immediately notify the person it believes to be the most likely descendent (MLD) of the deceased Native American.
 - The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
 - If the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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VI. ENERGY.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

The following analysis is based on the CalEEMod Output sheets provided in Appendix A, and the calculations included in the Energy Consumption Worksheet, provided in **Appendix D**. Although the construction activities modeled using CalEEMod included import of approximately 10,500 cubic yards of soil, a revised grading plan determined that soils would generally be balanced onsite, and the Project would require import of only approximately 6,000 cubic yards of soil. As such, the following analysis conservatively overestimates construction activity fuel use, and consumption of fuel during construction would be even lower than that shown below.

- a. Less Than Significant Impact.** A significant impact could occur if a project would result in wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation.

Construction

The Project’s energy demand during the construction period would primarily involve the consumption of transportation fuels (namely gasoline and diesel fuels) used by haul and delivery trucks and heavy-duty construction equipment, as well as by vendor and construction worker vehicles, that travel to and from the Project Site. The analysis conservatively assumes that heavy-duty construction equipment and haul trucks would be diesel-fueled, and the fuel economy for heavy-duty construction equipment is based on fuel consumption factors from CARB’s off-road vehicle (OFFROAD) emissions model, the state-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks and vendor and construction worker vehicles is based on fuel consumption factors from CARB’s emissions factor (EMFAC) model, the state-approved model for estimating the emissions of on-road vehicles and trucks. Both OFFROAD and EMFAC are incorporated into CalEEMod, which is used for the Project’s Air Quality and GHG emissions analyses. As construction activities do not usually involve natural gas consumption, it is not considered within this evaluation of construction fuel use.

The fuel consumption that is necessary to power off-road equipment is based on the quantity and type of equipment that would be used for each construction phase, the duration of use each day, the total construction period duration, and the hourly construction equipment fuel consumption factors that are made available by the OFFROAD model. On-road equipment includes haul trucks and vendor trucks, which are powered by diesel fuel, as well as vehicles associated with construction worker commuter trips, which are assumed to be powered by gasoline. The fuel consumption for on-road trucks is based on fuel consumption information from the EMFAC model. The fuel demand for construction worker commuter trips is based on the estimated number of workers for each phase of construction and the average distance that workers travel

from CalEEMod, as well as on the emissions factors from the EMFAC model. The energy demand of the Project's construction period is summarized in **Table VI-1, Project Construction Energy Use**, below.

Table VI-1
Project Construction Energy Use

Energy Source	Quantity Demanded during Construction
Transportation Fuels^a	
<i>Gasoline</i>	
On-road Worker Trips	11,692 gal
Gasoline Total	11,692 gal
<i>Diesel</i>	
On-road Haul Trucks	5,755 gal
On-road Vendor Trucks ^b	12,163 gal
Off-road Construction Equipment ^c	35,341 gal
Diesel Total	42,259 gal
Source: Energy Consumption Worksheet, provided in Appendix D. Notes: gal = gallons ^a On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2017 web-based data for each of the construction years in the SCAQMD. ^b Vendor trucks assumed to be diesel. ^c All emissions from off-road construction equipment were assumed to be diesel. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on SCAQMD CEQA Air Quality Handbook, Table A9-3E.	

As shown in Table VI-1, Project construction activities would result in the consumption of 42,259 gallons of diesel fuel and 11,692 gallons of gasoline. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Construction machinery and vehicles are required to adhere to all state and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. To be cost efficient, operators of machinery and vehicles would use that equipment only as needed and would use the most efficient routes to and from the Project Site, to minimize fuel consumption.

Additionally, pursuant to California Code of section 2449(d)(2), the Project's off-road diesel-fueled construction equipment would be prohibited from idling for more than five consecutive minutes, thus preventing wasteful, inefficient or unnecessary consumption of energy. Further, the construction contractors would use the best available engineering techniques, construction and design practices, and equipment operating procedures, thereby ensuring that the wasteful consumption of fuels and use of energy would not occur. Finally, the petroleum used during construction would be temporary and minimal, and would not be wasteful or inefficient. Therefore, the Project's potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operations

During Project operations, the proposed Project would generate a demand for energy for electricity, natural gas, and transportation fuels. Energy is required for lighting and heating/cooling the building, electronic devices, water and wastewater conveyance and treatment systems, and gasoline and diesel fuels for employee, customer/visitor, and vendor/delivery vehicles and trucks that travel to and from the Project Site.

The Project's annual electricity demand (including energy for water and wastewater conveyance and treatment) and for natural gas were calculated using the CalEEMod demand factors. The Project's transportation fuel demand was calculated based on fuel consumption factors from the CARB EMFAC2017 emissions model, and the trip lengths and the vehicle fleet mix estimated by CalEEMod. The Project's estimated energy demand and transportation fuel use during operations is summarized in **Table VI-2, Project Operations Energy Use.**

Table VI-2
Project Operations Energy Use

Energy Source/Fuel	Operations Annual Demand
Electricity ^a	804,010 kWh
Natural Gas ^a	683,149 kBTU
Transportation Fuels ^{b, c}	
<i>Gasoline</i>	45,842 gallons
<i>Diesel</i>	9,969 gallons
Source: Energy Consumption Worksheet, provided in Appendix D.	
Notes: kWh = kilowatt-hours kBTU = kilo-British Thermal Units	
^a Estimated by CalEEMod. Outputs included in Appendix A. Proposed building square footages are slightly reduced from the total used to generate the CalEEMod outputs.	
^b Project gasoline and diesel use during operations are calculated based on the VMT estimated by CalEEMod. Outputs included in Appendix A. Fuel use calculations assume light-duty vehicles (92% of Project VMT) use gasoline, while heavy-duty (Gross Vehicle Weight Rating > 8,500 pounds) use diesel.	
^c Project gasoline and diesel use are calculated based on fuel consumption factors for calendar year 2022 from EMFAC2017 (25.6 miles per gallon for gasoline-fueled vehicles and 10.24 miles per gallon for diesel-fueled vehicles).	

Electricity

The Project would be supplied electricity from LADWP. As estimated by CalEEMod, the Project's total electricity demand would be approximately 804,010 kilowatt-hours per year (kWh/year) or 804.01 megawatt hours per year (MWh/year). LADWP supplies more than 24 million MWh/year of electricity to the City's residential and business customers.²⁴ The Project's electricity use would represent approximately 0.003 percent of the LADWP yearly electricity demand, which is negligible in relation to the entire City's electricity demand. Therefore, the Project would not result in substantial increase in electricity demand.

In addition, the Project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. The LADWP has increased renewable energy through active procurement of renewable resources included in the Renewable Portfolio Standard (RPS)²⁵ and the Strategic Long-Term Resource Planning,²⁶ which specifies a roadmap for providing reliable and sustainable electricity use to customers through 2050. Compliance with these measures, which are among the most stringent in the country, would ensure that the Project does not consume electricity in a wasteful or inefficient manner. Therefore, it is expected that the Project would be designed and built to minimize electricity use and that existing and

²⁴ LADWP, Power Today, Accessed on May 14, 2021, at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afLoop=1595016012439636.

²⁵ LADWP, Power Today, Sustainability, Accessed on May 14, 2021, at: [ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afLoop=1596243708636711](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afLoop=1596243708636711).

²⁶ LADWP, Power Strategic Long Term Resource Plan, December 2017.

planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. By required compliance with applicable regulations and continued energy efficient programs implemented by the LADWP, the Project's potential impacts regarding wasteful or inefficient use of electricity energy supplies would be less than significant.

Natural Gas

The Project would be supplied with natural gas from the Southern California Gas Company (SoCalGas). Total Project demand for natural gas would be approximately 683,149 thousand British thermal units per year (kBTU/year) as estimated by CalEEMod outputs. According to the California Energy Commission, approximately 3,048.32 million therms or 304,759,233,485 kBTU/year of natural gas was consumed in Los Angeles County in 2019.²⁷ The Project would represent approximately 0.0002 percent of natural gas consumption in Los Angeles County in 2019, a negligible amount relative to Countywide consumption. Therefore, the Project would not result in substantial increase in natural gas demand.

In addition, the Project is required to comply with applicable portions of the California Energy Code and CALGreen Code, which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. By required compliance with applicable regulations, the Project's potential to result in impacts regarding wasteful or inefficient use of natural gas energy supplies would be less than significant.

Transportation Fuels

According to the CARB on-road vehicle emissions factor model, EMFAC2017, the average fuel economy for the fleet-wide mix of vehicles operating in the South Coast Air Basin for the year 2022 is approximately 25.6 miles per gallon for gasoline-fueled vehicles and approximately 10.2 miles per gallon for diesel-fueled vehicles. As shown in the Operational Fuel Use worksheet provided in Appendix D, the Project would generate approximately 1,276,091 VMT annually, 92 percent of which would comprise light-duty vehicles with a gross vehicle weight rating (GVWR) of up to 8,500 pounds, and approximately eight percent of which would comprise heavy-duty vehicles (GVWR > 8,500 pound). As such, during operations the Project would generate approximately 1,174,004 annual VMT with light-duty vehicles, and approximately 102,087 annual VMT with heavy-duty vehicles. As shown in Table VI-2, during operations, vehicle use associated with the Project would result in annual consumption of approximately 45,842 gallons of gasoline and 9,969 gallons of diesel fuel. In 2015, approximately 4.2 billion gallons of diesel²⁸ and 15.1 billion gallons of gasoline²⁹ were sold in California. As such, the Project would represent a negligible portion of statewide gasoline or diesel fuel consumption annually. Additionally, pursuant to the California Code of Regulations Title 13 Section 2485, diesel fueled commercial motor vehicles weighing above 10,000 pounds, such as trucks that may access the proposed light industrial warehouse or manufacturing use, are prohibited from idling for more than 5 minutes. As noted in the Project Description, the proposed Project includes electrical vehicle charging infrastructure onsite to support electrically powered automobiles. The Project would also support the future phase-in of zero and near-zero technologies for trucks during operations by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity. Additionally, onsite bicycle parking racks for employees or visitors use would be provided. Together, this would reduce consumption of petroleum fuels for transportation

²⁷ California Energy Commission, Gas Consumption by County, Los Angeles, Accessed on May 14, 2021, at: <https://ecdms.energy.ca.gov/gasbycounty.aspx>.

²⁸ California Energy Commissions, Diesel Fuel Data, Facts, and Statistics, Accessed June 4, 2021, at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics>.

²⁹ California Energy Commissions, California Gasoline Data, Facts, and Statistics, Accessed June 4, 2021, at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics>

purposes. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of transportation fuels.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Project would be required to adhere to all of the applicable energy conservation regulations adopted to implement state or local plans for renewable energy or energy efficiency, which include Green LA, adopted May 2007; Climate LA, approved 2008; and the City's 2019 Green New Deal which updated the City's Sustainable City pLAN, adopted in 2015. All of these plans have Citywide strategies that promote energy conservation. The Project's consistency with these plans is discussed in Section VIII, Greenhouse Gas Emissions.

The Project would also be consistent with various statewide and regional plans and regulations aimed at reducing greenhouse gas emissions, through strategies that would enhance energy efficiency through land use and transportation actions. These plans include the CARB Climate Change Scoping Plan 2017 Update and the SCAG RTP/SCS. The Project's consistency with these plans is discussed in Section VIII, Greenhouse Gas Emissions.

The Project would comply with CalGreen and would be designed to meet or exceed LEED standards or equivalent to reduce energy consumption. The City of Los Angeles Department of Building and Safety (LADBS) reviews site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the Project would be reviewed for consistency with applicable state and local plans for renewable energy and efficiency. The LAMC incorporates the CALGreen Code Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and require increased energy efficiency. The Project would be built to the codes in effect at the time of construction and would include Sustainability Features, as described in the Project Description. As the Project would comply with regulatory requirements for building efficiency, the Project's potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

The following section incorporates information for the Project Site provided by the Geotechnical Report, dated June 23, 2021, prepared by Partner Engineering and Science Inc., and the LADBS Grading Division’s Soils Report Approval Letter issued for the Project dated December 1, 2021 which are included as **Appendix E.1** and **Appendix E.2**, respectively, as well as the Project’s Phase I Cultural Resource Assessment, prepared by Envicom Corporation, dated July 14, 2021, and included as Appendix C.

a. i. Less Than Significant Impact. A significant impact could occur if a project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone. The Project Site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Site. The closest surface trace of an active fault to the Site is the Chatsworth fault, which is approximately .04 miles north of the Site. As the Project Site is not located within a state designated Earthquake Fault Zone, the potential for future surface rupture on the Project Site is considered low, and potential impacts associated with fault rupture would be less than significant.

Mitigation Measures: No mitigation measures are required.

a. ii. Less Than Significant Impact. A significant impact could occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the Site's response characteristics. Faults in the area which could affect the Project Site include the Chatsworth fault and the Northridge Hills fault (3.7 miles), and it is likely that future earthquakes will shake the Subject Property. However, the Geotechnical Report found the Project Site does not require a ground motion hazard analysis. The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #10 assuring conformance with current building codes and engineering practices as a matter of regulatory compliance regarding potential seismic hazards, included here as **Regulatory Compliance Measure RC-GEO-1**.

Regulatory Compliance Measure RC-GEO-1: Seismic Hazards

- The design and construction of the Project shall comply with the California Building Code seismic standards, as approved by the City of Los Angeles Department of Building and Safety.

Required compliance with Regulatory Compliance Measure RC-GEO-1 would ensure that current building codes and engineering practices are followed in the construction of the Project. Therefore, the Project's potential to cause substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iii. Less Than Significant Impact. A significant impact could occur if a Project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction.

Liquefaction is a process by which sediments below the water table temporarily lose strength and behave as a viscous liquid rather than a solid. The types of sediments most susceptible are clay-free deposits of sand and silts, although liquefaction may occasionally occur in gravel deposits. Liquefaction can occur when seismic waves, primarily shear waves, pass through saturated granular layers and distort the granular structure, causing loosely packed groups of particles to collapse. These collapses increase the pore-water pressure between grains if drainage cannot occur. If the pore-water pressure rises to a level approaching the weight of the overlying soil, the granular layer temporarily behaves as a viscous liquid rather than a solid.

The geotechnical report indicates that 10 to 12 feet of fill underlies the Project Site from previous development of the business park, and no groundwater was encountered in onsite borings to 50 feet below ground surface (bgs). However, according to the Geotechnical Report, the California Geological Survey indicates that the Project Site is located within a liquefaction hazard zone, and thus a liquefaction analysis

for the Site was performed. The liquefaction analysis results indicate that the Site is susceptible to roughly 0.5 inches of liquefaction-induced settlement.

The Project would be required to have all grading work observed by a geotechnical engineer to ensure adequate subgrade preparation, materials, placement, and compaction of structural fills pursuant to the [Q] Qualified Conditions of Approval Environmental Condition #34, included here as **Regulatory Compliance Measure RC-GEO-2 (Geology and Soils)**.

Regulatory Compliance Measure RC-GEO-2: Geology and Soils

- All grading work shall be performed under the observation of a Geotechnical Engineer in order to achieve proper subgrade preparation, selection of satisfactory materials, and placement and compaction of all structural fill.

Additionally, the Project would be required to implement recommendations of the Geotechnical Investigation as well as any conditions of the LADBS Grading Division's Soils Report Approval Letter issued for the Project. **Regulatory Compliance Measure RC-GEO-3 (Liquefaction Areas)** would ensure that recommendations of the Geotechnical Investigation and the LADBS Approval Letter conditions are to be incorporated in the Project design and construction.

Regulatory Compliance Measure RC-GEO-3: Liquefaction Areas

- The Project shall comply with the Uniform Building Code Chapter 18, Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. The Project shall also comply with the conditions contained within the City of Los Angeles Department of Building and Safety (LADBS) Grading Division's Soils Report Approval Letter issued for the proposed Project, and as it may be subsequently amended or modified.

Implementation of RC-GEO-2 and RC-GEO-3 would ensure that potential liquefaction impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

a. iv. No Impact. A significant impact could occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including landslides.

Landslides are a mass wasting phenomenon in mountainous and hillside areas that include a wide range of movements and occur when the stability of the slopes change to an unstable condition resulting from a number of factors including physical and/or chemical weathering of earth materials, unfavorable geologic structures relative to the slope geometry, erosion at the toe of a slope, and precipitation. The Project Site is a relatively flat infill property, all of which is, or has previously been, developed with a paved parking lot. The Site is not located within a landslide hazard zone according to the California Geological Survey and there is little topographical variation on the Site and in the surrounding vicinity, which precludes the potential for landslides and/or other hazards associated with hillside properties. Therefore, the Project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact may occur if a project would result in substantial soil erosion or the loss of topsoil. Although the Project Site is relatively flat, development of the Project has the potential to result in the erosion of exposed soils during Site preparation and construction

activities. All grading activities would require grading permits from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. Potential erosion and sedimentation would be reduced by implementing Best Management Practices (BMPs) for erosion control, as required by the City's grading and building permit regulations.

The Project would be required to implement measures to minimize soil erosion and/or loss of topsoil pursuant to [Q] Qualified Conditions of Approval Environmental Conditions #22, #23, and #24, which are included here as **Regulatory Compliance Measure RC-GEO-4 (Construction – Grading)**

Regulatory Compliance Measure RC-GEO-4: Construction – Grading

- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the Site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

With incorporation of RC-GEO-4, the Project's potential to result in substantial erosion or loss of topsoil would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact may occur if a project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As discussed above, the Project is located in a relatively flat area that would have no effect associated with landslides, and potential liquefaction impacts would be less than significant.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Site or in the general Site vicinity, and therefore there is little or no potential for substantial ground subsidence due to withdrawal of fluids or gases at the Site. Implementation of Regulatory Compliance Measures RC-GEO-1 through RC-GEO-4 would ensure potential impacts associated with a geologic unit or soil that is unstable or would become unstable as a result of the Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact could occur if a Project is built on expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Based on the Geotechnical Report's Prepared Subgrade Parameters, expansive material should not be located within the upper 3 feet of the soil subgrade. In addition, the Project would

comply with applicable City building codes and implement recommendations included in the Geotechnical Investigation. As such, potential impacts associated with expansive soils would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact may occur if a project site's soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The Project Site is located in a developed area of the City, which is served by an existing municipal wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems would be necessary, nor are they proposed. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. No Impact. A significant impact could occur if a Project would directly or indirectly destroy a unique paleontological resource or site or unique geological features. The Site is currently developed with a parking lot that does not contain unique geological features. Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and the accompanying geologic strata. As discussed in the Project's Phase I Cultural Resource Assessment (Appendix C) the native soils of the Site consist of recent alluvial material which is normally not fossil bearing and not considered paleontological sensitive. The report recommends no further paleontological assessment. As the Site contains 10-12 feet of fill material and the underlying native soils are not fossil-bearing, the Project would have no impacts on paleontological resources or unique geological features.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

GHGs emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth’s atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. According to California’s 2017 Climate Change Scoping Plan, in California, as in the rest of the world, climate change is contributing to an escalation of serious problems, including raging wildfires, coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution. For purposes of planning and regulation, Section 15364.5 of the CCR defines GHGs as including CO₂, CO, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. CO₂ is the primary GHG emitted in California, accounting for 84 percent of total GHG emissions in 2015. Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO₂ equivalents (CO₂e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO₂ (MTCO₂e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO₂ emissions in California. Additionally, about 50 percent of the industrial source emissions of CO₂ are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of statewide GHG emissions.

The Global Warming Solutions Act of 2006 (Assembly Bill, or AB, 32) required that the CARB determine the statewide 1990 GHG emission level and approve a statewide GHG emissions limit, equal to the 1990 level, to be achieved by 2020. As reported in the 2017 Climate Change Scoping Plan, California is on track to exceed its 2020 GHG reduction target. Executive Order B-30-15 and SB 32 extended the goals of AB 32 and set a 2030 goal of reducing emissions by 40 percent from 2020 levels.

The Project’s GHG emissions during construction and operation have been estimated using CalEEMod, which is discussed in Section III. The CalEEMod output sheets are included in Appendix A. Although the construction activities modeled using CalEEMod included import of approximately 10,500 cubic yards of soil, a revised grading plan determined that soils would generally be balanced onsite, and the Project would require import of only approximately 6,000 cubic yards of soil. As such, the following analysis conservatively overestimates construction activity emissions, and actual emissions would be even lower than those evaluated below.

a. Less Than Significant Impact. A project could have a significant impact if it would generate GHGs, either directly or indirectly, that may have a significant impact on the environment. In determining the significance of impacts from GHG emissions, Section 15064.4 of CEQA specifies that a lead agency has the discretion to determine whether to quantify project-related GHG emissions or to rely on a qualitative analysis or performance-based standards. Section 15064.4 also states that a lead agency should consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis.

The California Supreme Court's decision in the *Center for Biological Diversity v. California Department of Fish and Wildlife* (62 Cal. 4th 204), also known as the Newhall Ranch Case, reviewed the methodology used to analyze GHG emissions in CEQA. The Supreme Court suggested that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities as one pathway to determining the significance of a Project's GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rely on compliance with previously adopted plans or regulations for the reduction of GHG emissions. The Court also suggested other pathways to compliance, including relying on existing numerical thresholds of significance for GHG emissions (if supported by substantial evidence).

In October 2008, SCAQMD staff proposed the use of a numerical threshold of 3,000 MT of CO₂e per year for evaluating GHG impacts of commercial/residential projects, based on meeting the AB 32 emission reduction target. However, SCAQMD has not formally adopted a GHG significance threshold for land use development projects.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Nor have the SCAQMD, OPR, CARB, CAPCOA or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that the City has adopted that would be applicable to the Project. Pursuant to the CEQA Guidelines Section 15064.4(a), this evaluation quantifies GHG emissions resulting from the Project. However, in the absence of an adopted numerical threshold by the City, state, or SCAQMD, this analysis relies on a combination of the quantification of GHG emissions as estimated for the Project using CalEEMod and an evaluation of the Project's consistency with relevant local GHG reduction plans to evaluate the Project's GHG impacts.

Construction Impacts

During construction, the Project would temporarily generate GHG emissions from use of construction equipment, and various construction materials (paint, asphalt, etc.) would also result in the short-term generation of GHG emissions. As shown in the CalEEMod output sheets provided as Appendix A, Project construction activities would generate a total of 609 MTCO₂e emissions. The SCAQMD's GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime, which results in a Project amortized annual emissions of approximately 20.3 MTCO₂e emissions.

Operations Impacts

Operation of the proposed Project would result in GHG emissions from mobile sources, on-site use of natural gas and landscaping equipment, and off-site sources, such as electricity generation, water distribution and treatment, disposal of solid waste, and treatment of wastewater. The operational generation of GHG emissions were calculated using CalEEMod, as recommended by the SCAQMD. Operational GHG emissions are shown in **Table VIII-1, Annual Greenhouse Gas Emissions**.

**Table VIII-1
Annual Greenhouse Gas Emissions**

Consumption Source	MTCO₂e/year
Area Sources	< 0.1
Energy Utilization	485.4
Mobile Source	525.2
Solid Waste Generation	50.0
Water Consumption	204.2
Annualized Construction	20.3
Total	1,285.1
Source: CalEEMod.2016.3.1 output provided in Appendix A. Proposed building square footages are slightly reduced from the total used to generate the CalEEMod outputs.	

As shown in Table VIII-1, with the addition of the amortized construction GHG emissions discussed above, the emissions model estimates that the Project would result in annual emissions of approximately 1,285.1 MTCO₂e. This would be far below the SCAQMD staff proposed numerical threshold of 3,000 MT of CO₂e per year for evaluating GHG impacts of non-industrial projects. However, as discussed above no applicable quantitative threshold has been adopted for evaluating the significance of the Project's impacts, and this analysis will use a qualitative discussion of plan consistency to determine the potential significance of the Project's contribution to global GHG emissions and resulting environmental effects pursuant to CEQA Guidelines Section 15064.4(a).

Legislative mandates and regulations have been adopted to reduce GHG emissions resulting from new development. Some samples include:

- Significant improvements in building energy efficiencies, mostly due to increasingly stringent performance standards set forth in Title 24, Parts 6 and 11 of the California Code of Regulations.
- Cleaner burning petroleum-based transportation fuels and cleaner vehicle exhaust standards.
- Stronger standards for solid waste disposal to reduce wastes sent to landfills, where decaying trash generates methane gas, a potential greenhouse gas.
- Higher water conservation standards that reduce the amount of energy and related GHG emissions required to extract, treat and transmit water supplies.
- Renewable energy portfolio standards that require increasingly higher percentages of clean and renewable energy sources in the energy supply portfolio of major energy producing entities, including the Los Angeles Department of Water and Power (LADWP).

The Project's ability to comply with various state, regional, and local planning efforts to reduce GHGs are summarized below.

Applicable Plans and Regulations

The analyses below demonstrate that the Project is consistent with, and would not conflict with, applicable statewide, regional, and local GHG emission reduction plans, including the 2008 CARB AB 32 Climate Change Scoping Plan³⁰ and 2017 update,³¹ the SCAG RTP/SCS (Connect SoCal),³² Los Angeles Green

³⁰ California Air Resources Board, Climate Change Scoping Plan, December 2008.

³¹ California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017.

³² SCAG, The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), September 3, 2020.

Building Code,³³ the City’s Green LA Plan³⁴ and associated 2008 implementation plan ClimateLA, and L.A.’s Green New Deal.³⁵

State

CARB Assembly Bill 32 Scoping Plan

AB 32 required the California Air Resources Board (CARB) to develop a Scoping Plan that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by the Board in 2008 and included a suite of policies to help the state achieve its GHG targets, in large part leveraging existing programs whose primary goal is to reduce harmful air pollution. As shown by the policy consistency analysis below in **Table VIII-2, Project Consistency with 2008 Scoping Plan**, the Project would not conflict with AB 32 and the recommended actions of the Scoping Plan.

**Table VIII-2
Project Consistency with 2008 Scoping Plan**

Actions	Project Consistency
<p>California Cap-and-Trade Program Implement a broad-based California Cap-and-Trade Program to provide a firm limit on emissions. Link the California Cap-and-Trade Program other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.</p>	<p>Not Applicable. The Statewide Cap-and-Trade Program does not apply directly to the Project. The goal of the Program is to reduce GHG emissions from major sources (covered entities), such as electricity generation and large stationary sources (including refineries, cement production facilities, oil and gas production facilities, glass manufacturing facilities, and food processing plants), rather than from private commercial development such as the Project.</p>
<p>California Light-Duty Vehicle GHG Standards Implement the adopted Pavley Standards and the planned second phase of the program. Align ZEV, alternative, and renewable fuel and vehicle technology programs with long-term climate change goals.</p>	<p>No Conflict. The development and implementation of Statewide Pavley Standards is not the responsibility of individual development or the Project. However, the Project represents infill development in an area with access to public transit options and would incorporate the following sustainability features that would reduce GHGs and other pollutants from the transportation sector, consistent with the goals of the Pavley Standards:</p> <ul style="list-style-type: none"> • A minimum of ten percent of the new parking spaces as Preferential Parking for HOV carpool, commuter, or vanpool spaces. • Provisions for future electric charging stalls for EVs. • All truck loading docks will be EV-ready. • The Project will implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles. • The Project is located in close proximity to public transit located on the southeast corner of Fallbrook and Roscoe.

³³ Los Angeles Municipal Code Chapter IX Article 9.

³⁴ City of Los Angeles, GREEN LA An Action Plan to Lead the Nation In Fighting Global Warming, May 2 0 0 7.

³⁵ City of Los Angeles, L.A.’s Green New Deal Sustainable City pLAn, 2019.

Actions	Project Consistency
	<ul style="list-style-type: none"> A total of 15 short-term and 17 long-term bicycle parking racks/lockers are provided, pursuant to LAMC Section 12.21A.16(a)(1)(i).
<p>Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts, including new technologies and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p>Consistent. The Project would be constructed to meet or exceed a LEED standard or equivalent, to reduce energy consumption and comply with the performance standards of CALGreen and the Los Angeles Green Building Code (LAGBC). For example, the Project would utilize Energy Star rated products and appliances, high-efficiency wall and/or roof insulation, and/or high efficiency lighting (such as LED lighting instead of incandescent).</p>
<p>Renewable Portfolio Standard (RPS) Achieve a 33 percent renewable energy mix Statewide.</p>	<p>No Conflict. The Project would utilize energy supplied by the LADWP, which adopted policies to achieve a 33 percent renewable energy mix by 2020. LADWP reported that as of calendar year 2019, 34 percent of its power resources were from renewable energy sources, meeting the 2020 target a year ahead of schedule.</p>
<p>Low Carbon Fuel Standard (LCFS) Develop and adopt the LCFS, which would reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020.</p>	<p>Not Applicable. The LCFS would reduce the carbon intensity of transportation fuels that are consumed in California. However, it is not the responsibility of the Project to develop, adopt, or update the LCFS program.</p>
<p>Regional Transportation-Related GHG Targets Develop regional GHG emissions reduction targets for passenger vehicles.</p>	<p>Consistent. On October 30, 2020, CARB accepted SCAG's determination that the Connect SoCal 2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy would, when implemented, achieve the applicable GHG emissions reduction targets set by CARB on March 22, 2018 for automobiles and light trucks of 19 percent per capita reduction by 2035, relative to 2005 levels, as established by CARB for the region. ^a</p> <p>The regional GHG targets program does not directly apply to the Project. However, as the Project will redevelop an infill site with nearby transit facilities and would implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles, the Project would not conflict with the RTP/SCS's strategies as shown in Table VIII-4 below</p>
<p>Vehicle Efficiency Measures Implement light-duty vehicle efficiency measures.</p>	<p>Not Applicable. The implementation of vehicle efficiency measures is the responsibility of state agencies and does not directly apply to the Project.</p>
<p>Goods Movement Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.</p>	<p>No Conflict. The implementation of vehicle efficiency measures is the responsibility of state agencies and does not directly apply to the Project. However, the Project would support the future phase-in of zero and near-zero technologies for trucks used in goods movement by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of evolving technology that allows trucks to operate partially or entirely on electricity.</p>

Actions	Project Consistency
<p>Million Solar Roofs Program Install 3,000 megawatts (MW) of solar-electric capacity under California’s existing solar programs.</p>	<p>No Conflict. The Project would receive energy from the LADWP, which adopted policies to achieve a 33 percent RPS by 2020, 50 percent RPS by 2025, 55 percent RPS by 2030, and 65 percent RPS by 2036. LADWP reported that as of calendar year 2019, 34 percent of its power resources were from renewable energy sources, meeting the 2020 target a year ahead of schedule. Additionally, the Project would comply with Title 24 energy efficiency standards and would provide solar ready roof areas as applicable.</p>
<p>Medium/Heavy-Duty Vehicles Adopt medium and heavy-duty vehicle efficiency measures.</p>	<p>No Conflict. The implementation of vehicle efficiency measures is the responsibility of state agencies and does not directly apply to the Project. However, the Project would support the future phase-in of zero and near-zero technologies for trucks by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity.</p>
<p>Industrial Emissions Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.</p>	<p>Not Applicable. The Project does not propose large industrial uses, oil or gas extraction, or refinery facilities.</p>
<p>High Speed Rail Support implementation of a high speed rail system.</p>	<p>Not Applicable. It is the responsibility of state agencies, such as the California High Speed Rail Authority, to support implementation of the high speed rail system. This measure does not directly apply to the Project.</p>
<p>Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.</p>	<p>No Conflict. The Project would comply with CALGreen building standards and would include sustainability features, such as low flow water fixtures. The Project would be designed to meet or exceed LEED standard or equivalent to reduce energy consumption and comply with the performance standards of the LAGBC.</p>
<p>High Global Warming Potential (GWP) Gases Adopt measures to reduce high GWP gases.</p>	<p>Not Applicable. State agencies are responsible for implementing reduction measures for high GWP gases. This measure does not directly apply to the Project.</p>
<p>Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.</p>	<p>Consistent. The Project is subject to the City’s waste diversion program, which requires that construction waste be reduced by at least 50 percent and that at least 75 percent of operational waste be diverted through reduction, recycling, and composting efforts. The Project would provide separate bins recycling and trash to facilitate waste diversion during operations.</p>

Actions	Project Consistency
<p>Sustainable Forests Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.</p>	<p>No Conflict. The Project would have a total of 176 trees including existing trees to be retained and additional plantings, which would exceed the current number of trees on the Site,</p>
<p>Water Continue efficiency programs and use cleaner energy sources to move and treat water.</p>	<p>Consistent. The Project would be required to comply with applicable CALGreen measures for low flow plumbing features and fittings for water use efficiency.</p>
<p>Agriculture In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update, determine if the program should be made mandatory by 2020.</p>	<p>Not Applicable. The Project does not contain agricultural facilities and therefore this measure is not directly applicable.</p>
<p>Source: California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, December 2008. ^a State of California Air Resources Board Executive Order G-20-239 Southern California Association of Governments' (SCAG) 2020 Sustainable Communities Strategy CARB Acceptance of GHG Quantification Determination, Executed October 30, 2020.</p>	

2017 Scoping Plan Update

AB 32 requires that CARB update the Scoping Plan at least every five years. The latest update of the Scoping Plan is California’s 2017 Climate Change Scoping Plan (2017 Scoping Plan Update). The 2017 Scoping Plan Update provides a strategy for achieving California’s 2030 target of 40 percent emissions reductions below 1990 levels codified by SB 32. As shown by the policy consistency analysis below in **Table VIII-3, Project Consistency with 2017 Scoping Plan Update**, the Project would be consistent with the 2017 Scoping Plan policies.

**Table VIII-3
Project Consistency with 2017 Scoping Plan Update**

Policy	Primary Objective	Consistency
<p>SB 350</p>	<p>Reduce GHG emissions in the electricity sector through the implementation of the 50 percent RPS, doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan (IRP) process.</p>	<p>No Conflict. The LADWP would be the electricity provider for the Project and would be responsible for meeting the applicable RPS standards. Nonetheless, the Project supports this policy and objective since it would be designed to meet a LEED standard or equivalent and would meet or exceed the mandatory performance standards of CALGreen and the LAGBC. Thus, the Project would reduce energy use and the associated GHG emissions, and therefore, would not conflict with this policy.</p>
<p>Low Carbon Fuel Standard (LCFS)</p>	<p>Transition to cleaner/less-polluting fuels that have a lower carbon footprint.</p>	<p>Not Applicable. The LCFS would reduce the carbon intensity of transportation fuels that are consumed in California. However, it is not the responsibility of the Project to develop, adopt, or update the LCFS program.</p>

Policy	Primary Objective	Consistency
Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario)	Reduce GHGs and other pollutants from the transportation sector through transition to zero emission and LEVs, cleaner transit systems and reduction of VMT.	<p>Consistent. The Project would incorporate the following features that would reduce GHGs and other pollutants from the transportation sector:</p> <ul style="list-style-type: none"> • A minimum of ten percent of the new parking spaces as Preferential Parking for HOV carpool, commuter, or vanpool spaces. • Provisions for future electric charging stalls for EVs. • All truck loading docks will be EV-ready. • The Project will implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles. • The Project is located in close proximity to public transit located on the southeast corner of Fallbrook and Roscoe. • A total of 15 short-term and 17 long-term bicycle parking racks/lockers are provided, pursuant to LAMC Section 12.21A.16(a)(1)(i).
SB 1383	Approve and Implement Short-Lived Climate Pollutant strategy to reduce highly potent GHGs	Not Applicable. The Project would not be responsible for implementing a Short-Lived Climate Pollutant strategy to reduce highly potent GHGs.
California Sustainable Freight Action Plan	Improve freight efficiency, transition to zero emission technologies, and increase competitiveness of California’s freight system.	Consistent. The Project would support the future phase-in of zero and near-zero technologies for trucks during operations by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity.
Post-2020 Cap-and-Trade Program	Reduce GHGs across largest GHG emissions sources	Not Applicable. The Project would not be responsible for implementing a Cap-and-Trade program for large GHG emissions sources.

Source: California Air Resources Board, California’s 2017 Climate Change Scoping Plan, November 2017.

Regional

2020-2045 RTP/SCS (Connect SoCal)

The SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as Connect SoCal,³⁶ demonstrates the region's ability to attain and exceed the state's GHG emission reduction targets. The RTP/SCS is a regional plan for integrating the transportation network and related strategies with an overall land use pattern to accommodate projected growth, housing needs, and transportation demands. The goals of Connect SoCal, SCAG's 2020-2045 RTP/SCS, fall into the following core categories: economy, mobility, environment, and healthy/complete communities. Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve the state's GHG emission reduction goals and Federal CAA requirements. In addition, the plan strives to achieve broader regional objectives, including the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries, and the more efficient use of resources. The Connect SoCal Plan has strategies for infrastructure and land use siting, with the intent to reduce vehicle trips by increasing carpooling and transit use, reduce per capita VMT, reduce travel delay, create jobs, and conserve open space by siting new development in denser areas. Planned GHG reductions are to be achieved by reducing VMT. The 2016 baseline for Los Angeles County is 22.2 daily VMT per capita and the 2045 target is 19.2 VMT per capita. The strategies would reduce environmental impacts from regional movement of goods, promote job creation, and keeping the region economically competitive. Strategies include infrastructure investments that would improve freight movement, develop the workforce, and a goods movement strategy that would address air quality impacts. The Connect SoCal Plan focuses on updating existing truck fleets for fuel efficiency, with the eventual goal of zero emissions goods movement. The truck fleet strategy consists of four phases for scoping, developing, demonstrating, and deploying zero or near-zero emission trucks by 2045, through technologies including battery electric, fuel cell, or hybrid engine freight trucks. The Project would support the future phase-in of zero and near-zero technologies for trucks during operations by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity.

The RTP/SCS focuses the majority of new housing and job growth in High-Quality Transit Areas (HQTAs) and other opportunity areas such as commercial corridors, resulting in more opportunity for transit-oriented development. The Project Site is served by an existing bus stop (Metro 152/353) located at the Roscoe Boulevard/Fallbrook Avenue intersection and is located approximately 1,300 feet (0.25 mile) from a designated HQTA identified by the RTP/SCS. The availability of nearby existing transit options would reduce the need for reliance on personal vehicle transportation for employees of the proposed infill development. The Project would be consistent with GHG reduction strategies in the RTP/SCS that aim to reduce VMT by changing the region's land use and travel patterns, such as providing compact growth in infill areas accessible to transit and providing jobs closer to transit facilities. **Table VIII-4, Project Consistency with Connect SoCal (RTP/SCS)**, lists the relevant strategies identified in Connect SoCal that could be implemented to help achieve the state-mandated GHG emissions reduction targets and provides an analysis of Project consistency with each strategy.

³⁶ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 3, 2020.

**Table VIII-4
Project Consistency with Connect SoCal (RTP/SCS)**

Connect SoCal Strategies	Consistency Analysis
<p>Focus Growth Near Destinations & Mobility Options</p> <ul style="list-style-type: none"> • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify way to “right size” parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking) 	<p>Consistent. The Project would increase land use density on the urban infill Project Site, would be located near public transit stops, and would increase employment as compared to the existing land uses. The Project Site would also be located near major transit corridors, including Roscoe Boulevards and Fallbrook Avenue. Additionally, the Project Site is served by a bus stop at the intersection of Roscoe Boulevards and Fallbrook Avenue. In addition, the Project would implement a TDM program, provide pedestrian access from adjacent roadways, and provide short- and long-term bicycle parking spaces, which would also serve to promote the use of alternative modes of transportation.</p>
<p>Promote Diverse Housing Choices</p> <ul style="list-style-type: none"> • Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions 	<p>No Conflict. The Project Site is zoned for light industrial use and does not include existing housing. The Project proposes light industrial uses consistent with the existing zoning and would not eliminate any housing units.</p>
<p>Leverage Technology Innovations</p> <ul style="list-style-type: none"> • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation 	<p>Consistent. The Project would be consistent with these strategies by implementing the following features that would reduce GHGs and other pollutants from the transportation sector:</p> <ul style="list-style-type: none"> • A minimum of ten percent of the new parking spaces as Preferential Parking for HOV carpool, commuter, or vanpool spaces. • Provisions for future electric charging stalls for EVs. • All truck loading docks will be EV-ready. • The Project will implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles.

Connect SoCal Strategies	Consistency Analysis
<p>Support Implementation of Sustainability Policies</p> <ul style="list-style-type: none"> • Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts, Community Revitalization and Investment Authorities, or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy 	<p>No Conflict. The funding, support, and implementation of these sustainability policies and strategies is the responsibility of SCAG. Nevertheless, the Project supports these policies and strategies by providing an urban infill development. It is also in proximity to transit corridors (Roscoe Boulevard and Fallbrook Avenue). These features of the Project all promote decreased VMT and a reduction in GHG emissions.</p>
<p>Promote a Green Region</p> <ul style="list-style-type: none"> • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space 	<p>No Conflict. The Project Site is located in a developed, urbanized area of the City. The Project would replace an existing parking lot with a light industrial development and would include landscaping buffers. The Project would not conflict with agricultural or food production policies, wildlife connectivity, or park space.</p>
<p>Source: Southern California Association of Governments, Connect SoCal (The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments), September 3, 2020.</p>	

City

Green LA Plan and ClimateLA

In April 2007, the City adopted Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (Green LA, or Green LA Plan), to present a framework for combatting global climate change and to engage City residents in creating a greener and more sustainable city. The Green LA Plan aims to reduce GHG emissions to 35 percent below 1990 levels by 2030 by increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. To achieve these overarching goals, the City has plans to implement the following actions:

- Green the power from the largest municipal utility in the US.
- Make the City a worldwide leader in green building.
- Transform the City into the model of an energy efficient city.
- Help Angelenos be “energy misers.”
- Decrease per capita water use.
- Lower the environmental impact and carbon intensity of transportation.
- Focus on mobility for people, not cars.
- Create a more livable city.
- Shift from waste disposal to resource recovery.
- Green the airports.
- Unpave paradise/create new paradises (parks).
- Create demand and catalyze growth of the green economic sector.
- Climate proof the City.

The Green LA Plan aims to take direct municipal action, partnered with the public and private sector, to mitigate GHG emissions. The Green LA Plan plans to transform the LADWP energy portfolio to 35 percent renewable energy by 2020 through compliance with the RPS policy. Under the Recovering, Energy, Natural Resources and Economic Benefit from Waste for Los Angeles Plan (RENEW LA, or RENEW LA Plan), the City is also working towards a “zero waste goal” through expanding recycling to multifamily dwellings and commercial establishments and restaurants, as well as urging developing facilities to convert refuse to energy without incineration.

In 2008, the City adopted ClimateLA, the implementation program that provides detailed information about each action item discussed in the Green LA Plan. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City’s fleet vehicles to cleaner and more efficient models and reducing water consumption. Information about proposed and/or ongoing programs, opportunities for achieving the City’s goals, specific challenges, and a list of milestones is provided for each action item. The scope of these actions ranges from those impacting only municipal facilities, such as retrofitting City Hall with high efficiency lighting systems, to those facilitating changes in the private sector, such as rebates for the purchase of energy-efficient appliances.

Los Angeles Green Building Code

LAGBC, found in Section IX, Article 9 of the Los Angeles LAMC, is based on the CALGreen Code that was developed and mandated by the state to attain consistency among the various jurisdictions within the

state, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint.³⁷ The LAGBC was adopted pursuant to the Los Angeles Green Building Ordinance No. 181,480 to assist in regulating and reducing GHG emissions. The Project would comply with the LAGBC by incorporating water and electricity use efficiency features, and it would meet construction waste diversion requirements. Through regulatory compliance, the Project would be consistent with the provisions of the LAGBC.

Mobility Plan 2035

The Mobility Plan 2035, a subsection of the City General Plan, provides a policy foundation for achieving a transportation system that balances the needs of all road users and includes goals to target GHG emissions reductions through a more sustainable transportation system. Strategies to achieve this goal include utilizing land use policies aimed at shortening the distance between housing, jobs and services; offering more attractive non-vehicular alternatives; and creating Transit Demand Management (TDM) programs to support Citywide reductions in VMT per capita. The Project is consistent with these goals of the Mobility Plan 2035, as it represents urban infill development that would increase land use density within the existing Corporate Pointe West Hills Business Park.

These existing area transit features encourage the use of alternative transportation modes that would reduce VMT per capita. Further, the Project Site and vicinity is served by an existing sidewalk network providing pedestrian access for future users of the Project to the surrounding community, which also encourages use of transportation alternatives that reduce VMT and would be consistent with the goal of the Mobility Plan 2035 to increase the use of alternative transportation modes.

L.A.'s Green New Deal / Sustainable City pLAN

The City's 2019 Green New Deal is the first update to the City's Sustainable City pLAN, which provides targets, milestones, and initiatives for reaching short-term and long-term sustainability goals. The Project would be consistent with L.A.'s Green New Deal emissions reduction and energy and water efficiency targets associated with individual project development, as it would comply with the performance requirements specified in the City's Building Code, including water and electricity use efficiency requirements.

The Project would redevelop an underutilized infill property currently occupied by a surface parking lot, within an urbanized area developed with a mix of residential, commercial, and light industrial uses. The Project Site is also located within walking distance of existing transit facilities, including an adjacent bus stop, and the nearby Metro G Line (Orange) busway and pedestrian/bike path along Canoga Avenue. As stated above, the Project would comply with mandatory City of Los Angeles' zoning regulations and building efficiency standards, including CALGreen and Title 24 building standards, per Article 9 of Chapter IX of the Los Angeles Municipal Code. As evaluated in Section XVII Transportation, the Project would generate an average work VMT per employee of 14.5 with mitigation to implement a TDM program, which is below the threshold of significance established by the City of Los Angeles for the area where the Project Site is located. Adhering to mandatory building energy efficiency standards and meeting VMT significance thresholds established by the City would, therefore, contribute to achieving the aspirations included in the Sustainable City pLAN. Therefore, the Project would promote the GHG emissions reduction and VMT reduction targets identified in L.A.'s Green New Deal and otherwise be consistent with the L.A.'s Green New Deal goals for reducing GHG emissions, as shown in **Table VIII-5, Project Consistency with L.A.'s Green New Deal**.

³⁷ LADWP, Green Building and Sustainability, available at: <https://www.ladbs.org/services/green-building-sustainability>, accessed on July 12, 2019.

Table VIII-5
Project Consistency with L.A.'S Green New Deal

Action	Consistency
Local Water	
Reduce potable water use per capita by 22.5% by 2025; 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.	No Conflict. Reducing Citywide water use is the responsibility of the City and LADWP. However, the Project would comply with CalGreen, LAGBC, State and City Plumbing Code, and City 184,248 Ordinance requirements for water conservation.
Clean and Healthy Buildings	
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.	No Conflict. This action is primarily the responsibility of the City. However, the Project would comply with CalGreen, LAGBC, and State and City Building Code requirements, as well as with Title 24 in effect at the time permits are obtained.
Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	No Conflict. This action is primarily the responsibility of the City. However, the Project would comply with CalGreen, LAGBC, and State and City Building Code requirements, as well as with Title 24.
Housing and Development	
Ensure 57% of new housing units are built within 1500 ft [feet] of transit by 2025; and 75% by 2035.	No Conflict. This action is primarily the responsibility of the City, and the Project would neither remove existing housing nor provide new housing. However, the Project Site is located in proximity to existing transit facilities, including a bus stop at the intersection of Fallbrook Avenue and Roscoe Boulevard, and would provide employment opportunities within an area served by transit.
Mobility and Public Transit	
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025; 50 percent by 2035; and maintain at least 50 percent by 2050.	No Conflict. While this action is primarily the responsibility of the City, the Project would introduce employment opportunities in an area served by transit, provide pedestrian access from adjacent existing sidewalks, provide bicycle parking, and implement a TDM program to encourage ride-share use to encourage the use of alternative transportation (transit, carpooling, walking, and bicycling) and reduce VMT.
Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.	Consistent. As evaluated in Section XVII Transportation, the Project would generate an average work VMT per employee of 14.5 with mitigation to implement a TDM program, which is below the threshold of significance established by the City of Los Angeles for the area where the Project Site is located.
Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the City to 25% by 2025; 80% by 2035; and 100% by 2050.	<p>No Conflict. The Project's parking area would include EV-ready parking spaces to accommodate future installation of EV chargers to meet City requirements.</p> <p>The Project would support the future phase-in of zero and near-zero technologies for trucks during operations by installing electrical conduits located at all loading docks, and other suitable location(s), to facilitate installation of electrical wiring and charging stations or plugs, in anticipation of future technology that allows trucks to operate partially on electricity.</p>
Source: City of Los Angeles Office of the Mayor, L.A.'s Green New Deal: Sustainable City pLAn 2019, April 2019.	

Plan Consistency Conclusion

In summary, the analysis demonstrates that the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, including the CARB AB 32 Scoping Plan and 2017 Scoping Plan Update, the 2020-2045 RTP/SCS (Connect SoCal), LAGBC, Mobility Plan 2035, Green LA/ClimateLA, and L.A.'s Green New Deal / Sustainable City pLAn. Therefore, the Project's potential impacts regarding GHG emissions would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As described in the evaluation discussed in Section VIII.a., the Project would be consistent with local and regional plans, policies, and regulations adopted for reducing GHG emissions. As such, the Project's potential to result in impacts regarding conflicts with GHG reduction plans would be less than significant.

Mitigation Measures: No mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

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

The following analysis is based on the Phase I Environmental Site Assessment Report (Phase I ESA) dated February 1, 2021, prepared by Partner Engineering and Science Inc., and provided as **Appendix F**.

Impact Analysis

a. Less Than Significant Impact. A significant impact could occur if a project would create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. The Project Site is zoned [T][Q]M1-1, which is a Limited Industrial (M1-1) zone with certain qualifying [Q] and temporary [T] conditions. The [Q] conditions applied to the property limit the allowed uses on the Site and are more restrictive than what is normally allowed in the M1-1 zone. Consequently, there are no allowed uses which would involve the routine transport, use, or disposal of hazardous materials in significant quantities.

Hazardous materials are defined by California Health and Safety Code section 25501, and reportable quantities in section 25507. Any substance or product for which the manufacturer is required to prepare a material safety data sheet is considered a hazardous material. There are many common household products that qualify as hazardous materials, and businesses in the proposed buildings will no doubt use cleansers or petroleum products, for example, that would qualify as hazardous materials. However, in order to represent a potentially significant impact a business would need to be engaged in an activity that routinely uses, stores, or creates reportable quantities of hazardous substances.

As specified by Ordinance No. 180,844,³⁸ the Project Site's [Q] Conditions of Approval, Development Conditions (#3) allow certain uses such as assembly and manufacture of electrical devices, and research and development laboratories, which could potentially utilize hazardous materials. However, these types of light industrial uses do not require the routine use, storage, or manufacture of reportable quantities of hazardous materials. Additionally, the Project Site's [Q] Conditions of Approval, Development Conditions (#2) limits uses to those that do not have a negative effect upon surrounding properties. Specifically, Development Condition #2 of the Site's [Q] Conditions of Approval states the following:

Use Limitations. All industrial and manufacturing uses shall be consistent with accepted principals of "light industrial" uses in which the processes carried on, the machinery used, and the goods and commodities carried to and from the premises will not cause any injury to, or will not adversely affect the amenity of the surrounding residential area by reason of the emission of light, noise, vibration, smell, fumes, smoke, vapor, steam, soot, ash, dust, wastewater or other waste products.

Given that any use proposed for the Site must be provided clearance from the Planning department, the intent, purpose, and letter of the [Q] conditions would be enforced. Although unlikely, if an allowed use did require the occasional utilization of hazardous materials in reportable quantities, it would be required to obtain a permit from the Los Angeles Fire Department (LAFD) ensuring proper storage, handling, and disposal, and all activities employing the materials would be required to take place indoors per requirements of the zoning. It would also be required to submit a Hazardous Materials Business Plan which would assist emergency responders in planning for emergencies at the Site. Because of these safeguards, and because it is anticipated that no allowed use would involve the routine utilization of reportable quantities of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operations, and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As stated in Section IX(a,) uses allowed on the Site are limited and none of the permitted uses would be expected to routinely use, store, or manufacture reportable quantities of hazardous materials. It is unlikely that any of the allowed uses would conduct activities that could potentially release hazardous materials into the environment if there was an accident condition during operations.

During construction activities, the Project could potentially result in the release of hazardous materials during grading if hazardous materials or conditions exist on the Site. Previous development within the Site consisted primarily of open space with a single-story building that occupied the northern corner of the property until the current parking lot was developed over the Site in approximately 1998-1999, which included removal of the previous structure. According to the Phase I ESA, the Project Site is located within

³⁸ City of Los Angeles Ordinance No. 180,844, Effective September 28, 2009, Council File No. 09-1510

the boundaries of the former Hughes Missile Systems facility, which is the subject of an open Corrective Action Case associated with releases of contaminants from the former Hughes facility.

Recognized Environmental Conditions

A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The Phase I ESA did not identify any REC for the Subject Property.

Controlled Recognized Environmental Condition

A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The Phase I ESA did not identify any CREC for the Subject Property.

Historic Recognized Environmental Condition

The Phase I ESA documented a Historic Recognized Environmental Condition (HREC) of the Site regarding groundwater impacted by historical releases of contaminants to the northwest of the Project Site associated with the former Hughes's operations, which was the subject of a remediation and monitoring program. According to the Phase I ESA groundwater remediation with injection wells has been underway since 1995 to achieve cleanup criteria at the contaminated site. Under the oversight of the RWQCB, the primary objective of the remediation program is to accelerate the degradation of VOCs to concentrations below the cleanup goals established in the 1992 Corrective Action Plan, which was most recently amended in 2016 (Addendum No. 5). Remediation techniques used at the Site have included remedial excavation, a groundwater recovery and treatment system, a soil vapor extraction system, and an air sparge system. Enhanced in-situ bioremediation was implemented in 2005 to 2020. The majority of the treatment areas are located to the northwest (0.17-mile from the Subject Property) of the Subject Property and along the northwestern boundary (0.34-mile from the Subject Property) of the Former Hughes facility. Two monitoring wells were located on the Project Site (and several others outside of the Project Site) and on March 22, 2018, the Regional Water Quality Control Board (RWQCB) concluded that the southern portion of the former Hughes facility, including the Project Site, had met the Regional Board requirements for groundwater closure and issued a No Further Action letter on March 22, 2018. The monitoring wells on the Project Site, CM-10 and CM-17, were removed on September 6th and 10th, 2018. Based on the analytical results and regulatory case closure, the impacts to groundwater beneath the Subject Property are considered to be HRECs. An HREC is defined in the ASTM International (formerly known as the American Society for Testing and Materials) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13) as "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls." There are no use restrictions associated with an HREC that would indicate a potential for construction activities to potentially release hazardous materials into the environment.

Environmental Issue

The Phase I ESA reports that an "environmental issue" refers to environmental concerns identified within the Phase I ESA that does not qualify as a REC; however, warrants further discussion. The Phase I ESA identified an "environmental issue" related to the open Corrective

Action Case regarding the Hughes facility Area of Concern (AOC) noted by the Department of Toxic Substance Control (DTSC), which was described as follows:

The Subject Property is located within the boundary of the open Corrective Action Case for the former Hughes Missile Systems facility. Additional investigations and/or submittals may be requested by the DTSC for the Subject Property since two AOCs including Solid Waste Management Unit (SWMU)-9 (Sanitary Sewer) and AOC-12 (Storm Sewers), were identified at the Subject Property in the 2008 RCRA Facility Assessment Report and remain uninvestigated. Closure certification and completion corrective action are outstanding. Partner notes that the DTSC has not investigated or required investigation of the sanitary and storm sewers.

The DTSC has not required investigations but considers both the site-wide sewer line and storm drain system as requiring further investigation. As reported in the Phase I ESA, a Resource Conservation and Recovery Act (RCRA) Facility Assessment Report (2008)³⁹ indicated that AOCs including Solid Waste Management Unit (SWMU)-9 (Sanitary Sewer) and AOC-12 (Storm Sewers) were identified at the Subject Property, with the following descriptions:

- SWMU-9 is defined as the Site wide sewer line. Releases to soil near soil boring BSL-4. Constituents include arsenic. The report notes that the Site wide assessment in 1991 did not show any metal contamination at detection limits. One sample had a trace (0.009 milligram per kilogram (mg/kg)) of toluene. Sample B-SL had 0.3 mg/kg of toluene. No other VOCs were detected. DTSC concluded that there was a need to determine if any issues remain.
- AOC-12 is defined as the Site wide storm water system. Releases are suspected.

According to guidance provided in a letter from the DTSC to the City of Los Angeles dated August 5, 2008, a soil sampling work plan would be required to be submitted to the DTSC for any construction proposed in an AOC or SWMU identified in the RCRA Facility Assessment Report (2008). If DTSC determines that contaminants are above acceptable levels for the intended use on a particular area of the Property, DTSC would require submission and approval of a remediation plan to address the contamination prior to issuance of a building permit. As reported in the Phase I ESA, the referenced RCRA Facility Assessment document identifies an AOC regarding onsite storm sewers, and an SWMU regarding an existing sewer line that crosses the Site, which the Project would relocate/realign within the property.

According to the Phase I ESA, soil at the Subject Property and larger Corporate Pointe at West Hills (formerly the Hughes Missile Systems facility)⁴⁰ is being managed under a Soil Management Plan prepared by Environ International Corporation dated May 12, 2008. The Phase I ESA makes the following Conclusions, Opinions and Recommendations:

- Further evaluation of subsurface environmental conditions is not warranted at this time.
- Manage any disturbance of onsite soils with existing Soil Management Plan as needed.
- Further assessment of onsite soils in the vicinity of the sewer lines may be required in the future by DTSC as part of ongoing open, Corrective Action Case for the former Hughes Missiles Co./Raytheon Systems Co. Facility. Note that the DTSC has not yet required investigation of these areas.

³⁹ Department of Toxic Substances Control, RCRA Facility Assessment. Hughes Missile Systems Company Canoga Park Facility (Raytheon) EPA ID – CAD041162124, January 30, 2008.

⁴⁰ Also referred to as the Former Canoga Park Facility and Raytheon Canoga Park Site in the Phase I ESA.

All grading activities require grading permits from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. The first 10-12 feet of soil on the Site is fill material and grading and construction is unlikely to require excavation below that level. However, the Project will require a realignment of the onsite sewer line that connects to the sewer system, which will require excavating existing pipe associated with SWMU-9 and trenching to install a replacement segment through the property that would not pass below the proposed structures.

The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #35, which requires the applicant comply with recommendations of the State of California Department of Toxic Substances Control, outlined in the letter dated August 5, 2008. The recommendations of the DTSC letter referenced in the [Q] Qualified Conditions of Approval Environmental Condition #35 are included here as **Mitigation Measure MM-HAZ-1 (Soil Sampling and Remediation)** augmented with specific performance criteria to address the potential release of hazardous materials during construction.

Mitigation Measure MM-HAZ-1 (Soil Sampling and Remediation)

- There shall be no restrictions on development in those areas on the Property not identified as an Area of Concern (AOC) or Solid Waste Management Unit (SWMU) in the documents entitled, “RCRA Facility Assessment, Hughes Missile Systems Company, Canoga Park Facility (Raytheon), EPA ID – CAD041162124”, dated January 30, 2008.
- A soil sampling work plan shall be submitted to the Department of Toxic Substances Control (DTSC) for approval, before the issuance of a building permit for any construction in an identified AOC or SWMU within the Property.
- The applicant shall enter into a contract with a qualified, independent third-party firm to conduct the soil sampling and laboratory testing to implement the soil sampling work plan as approved by DTSC.
- The soil sampling plan shall at a minimum include soil testing within areas of the property that the project would disturb within the AOC or SWMU identified in the RCRA Facility Assessment, Hughes Missile Systems Company, Canoga Park Facility (Raytheon), EPA ID – CAD041162124”, dated January 30, 2008, which consists of the storm sewers (AOC-12) and the sanitary sewer (SWMU-9).
- The soil sampling plan shall include testing for the presence of volatile organic compounds and determine if they are detected in concentrations exceeding any applicable Screening Level for Commercial/Industrial Soil (mg/kg), Cancer Endpoint levels established by the DTSC, which are listed in the *Human Health Risk Assessment (HHRA) Note Number 3, DTSC-modified Screening Levels* (June 2020) within Table 1: HHRA Note 3, June 2020, DTSC-recommended Screening Levels for Soil Analytes of that document.
- The applicant shall submit the results of the soil sampling plan to the DTSC for review and comment before the issuance of a building permit for any construction in an identified AOC or SWMU within the Property.
- Development and use of the Property may continue without further DTSC requirements, if DTSC determines that contaminants are at or below acceptable levels for the intended use of the particular areas of the Property.
- If DTSC determines that contaminants are above acceptable levels for the intended use on a particular area of the Property, DTSC shall require submission and approval of a remediation plan to address the contamination and concentrations are reduced to acceptable levels for the intended use of the particular areas of the Property prior to issuance of a building permit.

Additionally, **Regulatory Compliance Measure RC-HAZ-1 (Hazardous Materials Site)** would require confirmation from the Fire Department that any unknown contamination associated with the Site including the sewer line has been adequately remediated or that the proposed development will not impede on-going remediation activities. Therefore, potential impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

Regulatory Compliance Measure RC-HAZ-1 (Hazardous Materials Site)

- Prior to the issuance of any use of land, grading, or building permit, the applicant shall obtain a sign-off from the Fire Department indicating that all on-site hazardous materials, including contamination of the soil and groundwater, have been suitably remediated, or that the proposed Project will not impede proposed or on-going remediation measures.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. A significant impact may occur if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Casa Dei Maria Montessori pre-education school is within 1/4 mile, located at 8230 Fallbrook Avenue. As stated in Section IX(a) uses allowed on the Site are limited and none of the permitted uses would be expected to routinely use, store, or manufacture reportable quantities of hazardous materials. Also, none of the allowed Light Industrial uses would be expected to handle reportable quantities of acutely hazardous materials or engage in activities where hazardous emissions would be generated. A research laboratory may utilize hazardous substances in a controlled environment, for instance, but such a use is not engaged in production and therefore would be unlikely to use or create large quantities of hazardous materials or produce hazardous emissions. Many regulatory measures are in place for workplace chemicals and other hazardous materials. Usage of hazardous materials and machinery are subject to safe handling and usage requirements as labeled. All facilities would be constructed to current Building Codes requirements and would require Proposition 65 labeling pursuant to State of California requirements.

Additionally, as discussed in Section IX(a), the Project Site's [Q] Conditions of Approval, Development Conditions (#2) limits uses to those that do not have a negative effect upon surrounding properties. Specifically, Development Condition #2 of the Site's [Q] Conditions of Approval states the following:

Use Limitations. All industrial and manufacturing uses shall be consistent with accepted principals of "light industrial" uses in which the processes carried on, the machinery used, and the goods and commodities carried to and from the premises will not cause any injury to, or will not adversely affect the amenity of the surrounding residential area by reason of the emission of light, noise, vibration, smell, fumes, smoke, vapor, steam, soot, ash, dust, wastewater or other waste products.

With the specified limitations on allowed onsite land uses, it is not anticipated that the Project would use, store, or dispose of hazardous materials in quantities that could result in a release of toxic emissions that would pose a health hazard beyond regulatory thresholds, and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact could occur if a project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste

disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. As mentioned above the Site has a HREC and the business park the Project Site is within has an REC. These conditions are listed in the State Water Resources Control Board's (SWRCB's) GeoTracker database which makes up part of the Cortese List, the list compiled pursuant to Government Code Section 65962.5.

As explained above in IX(b) the Phase I ESA determined that an existing sewer line and storm drain system that cross the Site are considered Areas of Concern associated with an open corrective Action Case according to the DTSC. RCM-HAZ-1 will ensure compliance with DTSC recommendations, and RCM-HAZ-2 will ensure that if any hazardous materials are detected, handling of the material and proper clean-up activities will be determined by the Fire Department acting as the Certified Unified Program Agency tasked with ensuring such activities adhere to State standards. Therefore, although the Site is included on the Cortese List, it would not result in conditions that could create a significant hazard to the public, or the environment and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact could occur if a project would be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would result in a safety hazard or excessive noise for people residing or working in the area. The Project Site is not located within an airport land use plan or within 2 miles of an airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less Than Significant Impact. A significant impact could occur if a project would interfere with an emergency response plan or emergency evacuation plan. The Project Site is not located along a Selected Disaster Route within the Safety Element of the City General Plan.⁴¹ Woodlake Avenue is a designated route and less than a half mile to the west of the Project Site. The Project would not physically alter area roadways and therefore would not interfere with use of Woodlake Avenue for emergency response or emergency evacuation.

Development of the Project Site may require temporary partial lane closures of the business park campus internal circulation driveway for grading and/or paving of driveway aprons along the Project boundary, or adjacent roadways to connect utilities to existing offsite infrastructure. While partial lane closures may cause temporary inconvenience, they would only occur during the construction phase, and for a temporary time period. No complete street closures would occur, and the Project would not substantially interfere with emergency response or evacuation plans.

The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #38 assuring adequate emergency access will be maintained during construction, which is included here as **Regulatory Compliance Measure RC-HAZ-2 (Emergency Access)**.

Regulatory Compliance Measure RC-HAZ-2 (Emergency Access)

- During the Project's construction phase, the applicant shall ensure adequate through-access and emergency access to adjacent uses.

⁴¹ City of Los Angeles, Department of City Planning, General Plan, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, Adopted by City Council November 26, 1996.

As the Project would not cause permanent alterations to vehicular circulation routes or impede public access or travel upon public rights-of-way, and would be required to maintain adequate emergency access during construction, the potential to interfere with any adopted emergency response plan or emergency evacuation plan would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. Less Than Significant Impact. A significant impact could occur if a project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. The Project Site is located within the Corporate Pointe West Hills Business Park campus, which is situated within a Very High Fire Hazard Severity Zone (VHFHSZ).⁴² In the City of Los Angeles, the VHFHSZ comprises most of the hilly and mountainous regions of the City, such as sparsely developed areas around the City boundaries, including undeveloped open space along the City's western boundary in the Project Site vicinity. The VHFHSZ is extended from undeveloped open space areas just north of the Corporate Pointe West Hills Business Park to include the developed business park and the existing parking lot on the Project Site. The business park campus itself does not pose a substantial wildfire hazard as the buildings are surrounded by asphalt parking lots and irrigated landscaping. The Project proposes to redevelop the Site by replacing the existing parking lot with three concrete buildings that would be surrounded by a continuous paved parking area and an irrigated landscape buffer. Therefore the Project would not pose a substantial wildfire hazard that could affect persons or structures in the area in the event of a fire.

Mitigation Measures: No mitigation measures are required.

⁴² City of Los Angeles Fire Department, Fire Zone Map, Accessed on June 2, 2021, at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>.

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

Impact Analysis

a. Less Than Significant Impact. A significant impact could occur if a project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

The State Water Resources Control Board (SWRCB) and Los Angeles RWQCB (Regional Water Board) have adopted Waste Discharge Requirements (Order No. R4-2012-0175 amended June 2015 WQ-2015-0075) for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (MS4 Permit). The Los Angeles County MS4 Permit specifies requirements for discharges within the County’s Coastal watersheds and is in accordance with National Pollutant Discharge Elimination System (NPDES) Permit (No. CAS004001). The LAMC also provides Stormwater and Urban Runoff Pollution Control requirements. As a regulatory requirement of these existing MS4 Permits and the

LAMC (Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control), the Project would comply with applicable regulatory requirements to prevent the violation of water quality standards or the degradation of ground water quality.

During construction, temporarily exposed soils may be susceptible to erosion and sedimentation due to stormwater runoff. The Project is not steeply sloped and thus not expected to be subject to substantial erosion. However, implementation of BMPs would be required, such as sandbag use, to minimize sediment transport to off-site drainage facilities. As the Project's soil exploration borings to 50 feet below ground surface did not encounter groundwater, it is unlikely that construction activities would require dewatering and disposal of groundwater from the Site. However, construction site dewatering activities if necessary, would require a permit from the Regional Water Board prior to discharging any groundwater from the Site.

As the Project would be required to implement BMPs to minimize erosion and sedimentation impacts and to obtain appropriate permits if conditions require dewatering, construction impacts regarding water quality and waste discharge requirements would be less than significant.

During operations, the Project would be subject to applicable requirements of the Low Impact Development (LID) Ordinance. Per the City's LID design guidelines, the Project Site will be designed such that it will not exceed the existing stormwater flows. As the Project Site is currently developed with impermeable surfaces over the majority of the Site, the proposed development would not be expected to substantially increase the percentage of impermeable surface coverage of the Site.

Per the LID design guidelines the Project would be required to capture and treat stormwater runoff as required, by infiltration, evapotranspiration, capture and use, or treated through high removal efficiency biofiltration/biotreatment system of all of the runoff on-site. The Project's Grading and LID Study⁴³ indicates that subterranean storage/infiltration BMPs will be installed beneath the proposed driveway in the southeastern and northeastern corners of the Site, with a total designed capacity of 17,496 cubic feet, which would accommodate the required 17,012 cubic feet of retention/infiltration to meet LID requirements for the Site.

The City reviews all plans for new development and redevelopment projects to ensure that the appropriate construction and operational BMPs are incorporated to address stormwater pollution prevention goals. The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Condition #36 assuring compliance with applicable Stormwater and Urban Runoff Pollution Control Ordinance requirements, which is included here as **Regulatory Compliance Measure RC-HWQ-1 (Standard Urban Stormwater Mitigation Plan)**.

Regulatory Compliance Measure RC-HWQ-1 (Standard Urban Stormwater Mitigation Plan)

- The applicant shall comply with Ordinance No. 172,176 and Ordinance No. 173,494, Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board.

Additionally, required compliance with **Regulatory Compliance Measures RC-HWQ-2 through RC-HWQ-5**, described below, would ensure that the Project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction and operations.

⁴³ Psomas, Grading and LID Exhibit Fallbrook Point, June 17, 2021.

Regulatory Compliance Measure RC-HWQ-2: National Pollutant Discharge Elimination System General Permit

- National Pollutant Discharge Elimination System General Permit (NPDES). Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (Construction General Permit) for the Project. The Applicant shall provide the Waste Discharge Identification Number to the City to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Regulatory Compliance Measure RC-HWQ-3: Dewatering

- If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

Regulatory Compliance Measure RC-HWQ-4: Low Impact Development Plan

- Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan (LID) and/or Standard Urban Stormwater Mitigation Plan to the City's Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Regulatory Compliance Measure RC-HWQ-5: Development Best Management Practices

- The Best Management Practices (BMPs) shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet this numerical threshold standard shall be provided.

Project impacts related to the potential to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would substantially decrease groundwater supplies or interfere with groundwater recharge such that it may impede sustainable groundwater management of the basin. During construction, excavations are not expected to encounter groundwater. In the unlikely event that groundwater is encountered during excavations, any potential to

dewatering during construction would be temporary and therefore would not have the potential substantially alter groundwater levels. As such, construction impacts to groundwater levels would be less than significant.

During operations, the Project would be served by the LADWP for potable water supply and does not propose groundwater extraction that could potentially deplete groundwater resources. The Site is currently developed with a parking lot that covers the majority of the Site with impervious surfaces, and thus the Site is not a substantial contributor to groundwater recharge under existing conditions. The Project would install stormwater storage/infiltration BMPs to meet LID requirements to retain and/or treat onsite the first three-quarters of an inch of rainfall within a 24-hour period. Therefore, the Project would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge in such a way that may impede sustainable groundwater management of the basin. Thus, groundwater quantity impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.i. Less Than Significant Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial on- or off-site erosion or siltation.

The Project Site is currently developed as a parking lot and most of the area is covered with impermeable paved surfaces. No streams or rivers pass through the Site, and the nearest surface water to the Site is an open drainage channel approximately 1,000 feet west. The Project would not result in substantial change in the area covered with impervious surfaces and would be required to meet LID requirements to retain and treat stormwater runoff onsite to manage the quantity and quality of stormwater runoff. The LID Ordinance sets standards and practices to maintain or restore the natural hydrologic character of a development site, reduce off-site runoff, improve water quality, and provide groundwater recharge. During construction, the Project would be required to prepare and implement BMPs such as silt fencing that would reduce runoff leaving the Site and filter storm water to reduce erosion or siltation off-site. During operations, the Project would comply with the LID Ordinance requirements. Stormwater volumes exceeding the design capacity of onsite BMPs would leave the Site via existing street gutters and stormwater drains. Therefore, the potential for the Project to substantially alter the existing drainage pattern of the area resulting in substantial on- or off-site erosion or siltation would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less Than Significant Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

As discussed above there are no natural water courses on the property and the rate of runoff from the Site will not increase above existing conditions. As such, the Project would not substantially alter the drainage pattern or substantially increase the rate or amount of surface runoff that could result in flooding on- or off-site. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iii. Less Than Significant Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As discussed above, the proposed Project would not substantially alter the existing drainage patterns of the Site vicinity and would be required to meet LID requirements to retain and treat stormwater runoff onsite to manage the quantity and quality of stormwater runoff. Therefore, the Project would not substantially increase stormwater runoff volumes that could affect the existing capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff to the existing drainage system, or otherwise substantially degrade water quality, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. No Impact. A significant impact could occur if a project would substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. The Project is not located within a flood zone.⁴⁴ As such, the Project would have no impact regarding the potential to impede or redirect flood flows.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact could potentially occur if a project would risk the release of pollutants from inundation due to location in a flood hazard, tsunami, or seiche zone. The Project Site is located within Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Zone X, meaning it is determined to be outside of the 0.2 percent annual chance floodplain and is considered an “area of minimal flood hazard”.⁴⁵ A seiche, a wave created when a body of water is shaken, is a concern at water storage facilities because inundation can occur if the wave overflows a containment wall. The Chatsworth reservoir, located to the north of the Corporate Pointe West Hills Business Park is no longer used as a reservoir and is not filled with water, so there are no major water retaining structures located near the Project Site and no risk of flooding from seiche activity. The Project Site is not located in a flood hazard⁴⁶ or tsunami⁴⁷ zone, and it is not located in proximity to any large body of water subject to seiche conditions, therefore, no impact pertaining to the risk of release of pollutants due to the Site’s location in flood hazard, tsunami, or seiche zones would occur.

Mitigation Measures: No mitigation measures are required.

e. Less Than Significant Impact. A significant impact could potentially occur if a project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The Project Site was previously disturbed by the placement of impervious surfaces and development, and it does not propose groundwater extraction. The Project would be required to comply with the existing Regional Water Board Waste Discharge Requirements that are specified in the MS4 Permit. In compliance with the City’s LID requirements, the Project would capture and infiltrate stormwater

⁴⁴ Los Angeles County Department of Public Works, Flood Zone Determination Website, Accessed on June 2, 2021, at: <http://dpw.lacounty.gov/wmd/floodzone/>.

⁴⁵ Federal Emergency Management Agency (FEMA), FIRM panel 06037C1280F, Effective Date September 26, 2008.

⁴⁶ Los Angeles County Department of Public Works, Flood Zone Determination Website, Accessed on June 2, 2021, at: <http://dpw.lacounty.gov/wmd/floodzone/>.

⁴⁷ City of Los Angeles, Zoning Information and Map Access System (ZIMAS), Accessed on June 2, 2021, at: <http://zimas.lacity.org/>.

consistent with existing regulations. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. LAND USE AND PLANNING.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. No Impact. A significant impact could occur if a project would physically divide an established community. The Project Site is part of a corporate business campus that does not contain any residential or neighborhood commercial structures, and it will occupy a section that has most recently been used as a parking lot. Therefore, the Project would not physically divide an established community and no impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant impact could occur if a project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project conforms to the General Plan designation of Limited Industrial and the [T][Q]M1-1 zone. As discussed above in Section IX(a), the [Q] conditions placed upon the property limit the uses from what would normally be allowed in the M1-1 zone. The purpose of the conditions is to reduce the likelihood of uses that might create a nuisance. The Project will erect three light industrial buildings within a corporate business campus containing a mix of office and light industrial buildings. The new buildings will allow more business to be conducted at the Site in the manner of current operations. Uses allowed in the buildings will be according to the [Q] conditions, and there is nothing about the Project itself, the erection of three new buildings, that would conflict with these conditions, or any other regulation. Furthermore, the Q conditions for the Project Site permit the development of a warehouse project up to 180,000 square feet of floor area and 45-foot tall and the Project represents a considerable decrease from the above-described permitted floor area and height.

Citywide Design Guidelines

The proposed Project provides safe pedestrian accessibility to accommodate persons of all mobility levels. Pedestrian pathways extend up through the landscape buffers along the street frontages (Roscoe Boulevard and Fallbrook Avenue) and are clearly separated from planter areas with a raised curb and clearly striped for safety when crossing driveway aisles. Vehicular access to the Site is provided by two existing driveways entrances/exits, one each to Roscoe Boulevard and Fallbrook Avenue. Loading areas for each building are clearly identified and separated from pedestrian access paths and vehicle parking to minimize interference with both. The Subject Property’s frontages along Roscoe Boulevard and Fallbrook Avenue are improved with wide landscaped planters improved with existing and new trees and shrubs.

The proposed buildings are setback more than 103-feet from the street frontages and separated from nearby residential properties to the south and east with parking areas and landscape buffers. The buildings have been designed to include a variety of materials and colors, and incorporate vertical modulations that create smaller wall segments with a combination of four glass building entrances and four building segments/exterior wall panels, each of which are separated by either an eldorado stone vertical component or the blue non-reflective glass entryways into each building section. The proposed buildings are sited closer to the commercial buildings of the Business Park and further away from residential properties to the south and east, thus minimizing disruption to nearby residents. The color palette for the buildings is primarily earth tones to compliment the nearby residential properties; and the buildings mass and designs are consistent with the modern style architecture consistent with the commercial buildings to the north and west.

In all, the proposed Project is consistent with best practices suggested in the Citywide Design Guidelines, including Pedestrian-First Design, 360 Degree Design and Climate-Adapted Design.

Community Plan

The Project Site is located within the Chatsworth-Porter Ranch Community Plan (Community Plan) area. As shown in **Table XI-1, Project Consistency with Chatsworth-Porter Ranch Community Plan**, the Project would be consistent with the Community Plan’s Standards and Criteria for industrial uses. Therefore, the Project would not cause a significant environmental impact resulting from a conflict with an applicable land use plan, policy, or regulation of agencies with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

**Table XI-1
Project Consistency with Chatsworth-Porter Ranch Community Plan**

Standards and Criteria	Consistency Analysis
Industrial lands are located on a citywide basis without regard to the boundaries of individual communities, under the general principle that such employment should be available within a reasonable commuting distance from residential locations.	Consistent. Zoning of lands for industrial use is the responsibility of the City. However, the Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project conforms to the General Plan designation of Limited Industrial and the [T][Q]M1-1 zone. Existing residential neighborhoods are located adjacent to and in the vicinity of the Corporate Pointe at West Hills office/industrial campus, consistent with this standard.
Without effective Transportation Demand Management (TDM) strategies, such as carpool and vanpool or transit, parking should be provided at a ratio of one parking space per 300 gross-feet of floor area of office or industrial uses which are primarily (over 50%) “high-tech” in nature. These uses may include research, development, manufacturing, assembly, repair, testing or high-technology type industries, and service industries, including computer programming, data processing and research laboratories.	Consistent. The Project will implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles. Additionally, the Project would provide 262 off-street parking spaces distributed throughout the property, which exceeds the 150 off-street parking spaces required per Code (LAMC Section 12.21A.4).

Standards and Criteria	Consistency Analysis
<p>On-street parking should be prohibited in industrial areas whenever possible.</p>	<p>Consistent. Parking restrictions are not the responsibility of the Project. Nonetheless, on-street parking is currently prohibited on the adjacent sides of Roscoe Boulevard and Fallbrook Avenue and the proposed Project would not affect this restriction. Additionally, the Project would provide 262 off-street parking spaces distributed throughout the property, which exceeds the 150 off-street parking spaces required per Code (LAMC Section 12.21A.4). No on-street parking would be required to meet the Project’s parking needs.</p>
<p>The growth of new technological industries, the advent of sophisticated communication systems, and the affinity between office and industrial uses suggest the need for more flexible zoning.</p>	<p>Not Applicable. Zoning is not the responsibility of the Project. However, the Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project conforms to the General Plan designation of Limited Industrial and the [T][Q]M1-1 zone.</p>
<p>The [Q]M1 Zone classification is permitted on those properties fronting on the following corridors: (1) the north and south sides of Nordhoff Street between De Soto Avenue and Topanga Canyon Boulevard; (2) the east side of Topanga Canyon Boulevard, from Nordhoff Street to the south side of Lassen Street; and (3) the south side of Lassen Street between Topanga Canyon Boulevard and De Soto Avenue. Such conditions of approval shall prohibit smoke stacks, metal plating, toxic and noxious industrial uses, and any new retail commercial uses within these zone classifications.</p>	<p>Consistent. The Project Site is not located on Nordhoff Street, Topanga Canyon Boulevard, or Lassen Street. However, the Project Site is zoned [T][Q]M1-1. The Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project conforms to the General Plan designation of Limited Industrial and the [T][Q]M1-1 zone. Pursuant to Case File No. Case DIR-2019-7507-ACI-CLQ, any industrial and manufacturing uses on the Site shall be consistent with accepted principals of “light industrial” uses in which the processes carried on, the machinery used, and the goods and commodities carried to and from the premises will not cause any injury to, or will not adversely affect the amenity of the surrounding residential area by reason of the emission of light, noise, vibration, smell, fumes, smoke, vapor, steam, soot, ash, dust, waste water or other waste products. No smoke stacks, metal plating, toxic and noxious industrial uses, or new retail commercial uses are proposed, and none would be allowed pursuant to existing zoning restrictions.</p>
<p>Industrial acreage shown on the Plan should be protected from intrusion by non-industrial uses, except those corridors described above on Nordhoff Street, Topanga Canyon Boulevard, and Lassen Street should allow uses similar to those permitted in the M1 and M2 Zones. In keeping with the low- density residential character of the Community, to the extent possible, the Plan proposes preservation of all existing MR zoned lands, and classification of all undeveloped industrial land in the MR1 and MR2 Zones.</p>	<p>Consistent. The Project would construct a light industrial use development on M1-zoned industrial acreage within the Corporate Pointe at West Hills office/industrial campus and would therefore not result in intrusion of non-industrial uses in industrial acreage.</p>

Standards and Criteria	Consistency Analysis
<p>The Plan encourages continued development of research and development-type industries which do not generate excessive noise, dust, and fumes and are compatible with the residential character of the north and west San Fernando Valley.</p>	<p>Consistent. The Project would construct a light industrial use development on a property zoned [T][Q]M1-1. The Project will carry out the final phase (Phase II) development of the Corporate Pointe at West Hills office/industrial campus, which the City approved in 2009 and most recently amended in April 2020 pursuant to Case No. DIR-2019-7507-ACI-CLQ. The Project conforms to the General Plan designation of Limited Industrial and the [T][Q]M1-1 zone. Pursuant to Case File No. Case DIR-2019-7507-ACI-CLQ, any industrial and manufacturing uses on the Site shall be consistent with accepted principals of “light industrial” uses in which the processes carried on, the machinery used, and the goods and commodities carried to and from the premises will not cause any injury to, or will not adversely affect the amenity of the surrounding residential area by reason of the emission of light, noise, vibration, smell, fumes, smoke, vapor, steam, soot, ash, dust, waste water or other waste products.</p>
<p>Source: City of Los Angeles Department of City Planning, Chatsworth-Porter Ranch Community Plan, Revised September 4, 1993.</p>	

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. MINERAL RESOURCES.

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a-b. No Impact. A significant impact could occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if a project development would convert an existing or future regionally important mineral extraction use to another use, or if a project development would affect access to a Site used or potentially available for regionally important mineral resource extraction.

The Project will place three new buildings into an existing corporate business park, in an area now used for parking. The Subject Property is not located in a mineral resource zone area according to Exhibit A, Mineral Resources, of the City Conservation Element.⁴⁸ According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources,⁴⁹ and the City’s Zoning Information and Map Access System (ZIMAS),⁵⁰ no oil or gas wells are identified on-site. No mineral resources are known to exist within the Project Site and construction of the Project would not result in the loss of availability of known mineral resources or a locally important mineral resource recovery site. As such, no impact associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures: No mitigation measures are required.

⁴⁸ City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, Exhibit A- Mineral Resources, Adopted by the City Council September 26, 2001.

⁴⁹ California Department of Conservation, Geologic Energy Management Division's (CalGEM) online mapping application Well Finder, Accessed on June 25, 2021 at: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/>.

⁵⁰ City of Los Angeles, Zoning Information and Map Access System (ZIMAS), Accessed on March 29, 2021 at: <http://zimas.lacity.org/>.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. NOISE.

Would the project result in:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Analysis

The following discussion assesses the potential noise impacts of the Project and provides a brief description of the key terms and concepts used in the analysis of noise impacts.

Noise is unwanted sound. Sound is mechanical energy that is transmitted by pressure waves through a compressible medium such as air. The sound pressure level, expressed in decibels (dB), has become the most common descriptor used to characterize the loudness of an ambient sound level. A dB is a logarithmic unit of the ratio of sound pressure to a reference sound pressure level, standardized as 20 micropascals, the threshold of human hearing. Sound or noise can vary in intensity by over one million times within the range of human hearing, so a logarithmic loudness scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum so noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called A-weighting written as dB(A) or dBA. Subsequent references to decibels written as dB should be understood as A weighted dB(A).

Time variations in noise exposure are typically expressed in Leq, a steady-state energy level equal to the energy content of the time varying period. Leq provides a statistical description of the sound level that is exceeded over some fraction of a given observation period. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL), a weighted average of noise levels over time.

Because dB are logarithmic units, noise levels from multiple sources cannot be added by ordinary arithmetic means. For example, when the sound pressure level of two sources is equal, the resulting noise level is 3 dB greater than the noise level of one source.

The following formula converts dB from logarithmic units to linear units for addition of the dB and calculation of the increase in ambient noise.

$$L = 10 \cdot \log \left(\sum_{i=1}^n 10^{L_i/10} \right)$$

Where:

L = composite noise level
n = number of individual noise levels being summed
L_i = individual noise level

Two of the primary factors that reduce noise levels at the receiver are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness at the receiver include moving the sound source closer to the receiver, reflection from surfaces, and various meteorological conditions.

a. Less Than Significant Impact. A project may have a significant noise impact if it would cause a substantial temporary or permanent increase in ambient noise levels in the vicinity in excess of standards established in the local general plan or noise ordinance.

Based on the Noise Element of the City General Plan, a 55 dB CNEL exposure is considered the most desirable target for the exterior of noise sensitive land uses such as homes, hotels and schools. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dB CNEL for noise sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are considered normally unacceptable for noise sensitive uses except in unusual circumstances.

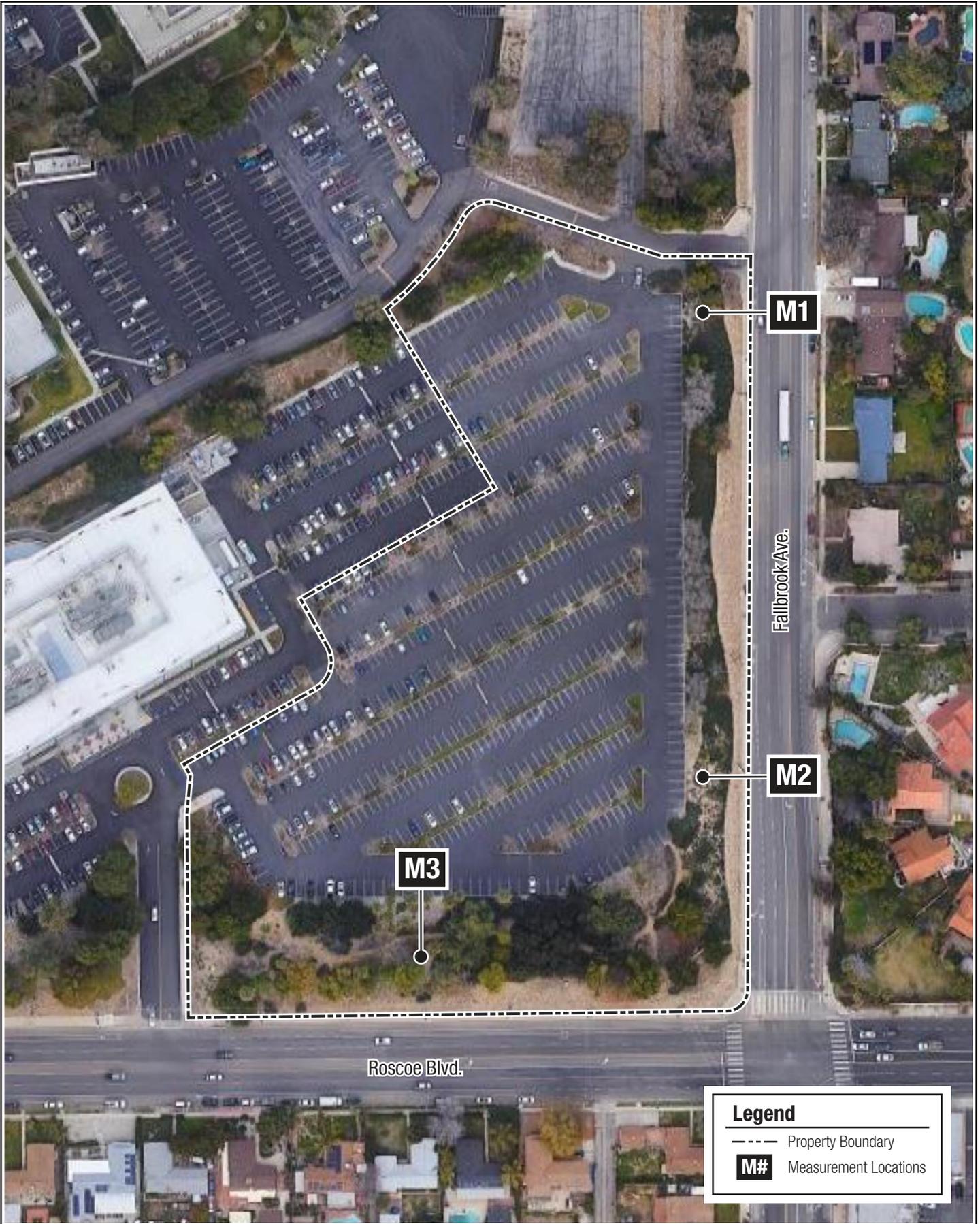
The City's noise standards for non-transportation sources are articulated in Noise Ordinances that regulate noise from one land use crossing the property line of an adjacent property line. Noise ordinances contained in Chapter IX, Noise Regulation, of the LAMC restrict the level of noise that one type of land use or activity may broadcast across an adjacent land use. Noise Ordinance standards are stated with respect to ambient levels found without the contribution of an identified noise source.

The Noise Ordinance provides numerical standards that apply to "stationary" sources of noise generation (mechanical equipment such as air conditioning, refrigeration, heating, or pumping). If such activities are not specifically prohibited by the Noise Ordinance, the noise constraint for general stationary sources is that they may not increase the ambient level by more than 5 dB above⁵¹ ambient levels. Generally, an increase of 3 dB over ambient conditions is accepted as the minimum increase that can be perceived by humans, outside of controlled laboratory conditions. Section 41.40 of the LAMC regulates construction noise by limiting construction activity to certain hours.

To obtain existing ambient noise levels at and around the Project Site, Envicom Corporation measured ambient noise levels on Thursday, June 10, 2021, in 15-minute intervals at three locations as shown in **Figure XIII-1, Noise Measurement Locations**.

Table XIII-1, Ambient Noise Measurements, shows the ambient noise levels measured at these locations. These locations are a similar in distance from the roadways to the nearest sensitive land uses and it is therefore assumed that noise levels at these locations are representative of the nearby sensitive receptors. As shown in Table XIII-1, ambient noise levels in the Site vicinity were measured to be 65.6 dB Leq along

⁵¹ City of Los Angeles Municipal Code Section 111.02.



Source: Google Satellite Imagery, Aug. 19, 2019.

FALLBROOK POINT – INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

envicom

Noise Measurement Locations



Roscoe Boulevard, and 58.3 dB to 59.8 dB Leq along Fallbrook Avenue. These baseline ambient levels will be used in this analysis for the purpose of determining the potential increase over existing noise levels that could result from the Project.

**Table XIII-1
Ambient Noise Measurements**

Number	Location	Time	dB Leq ^a	Primary Noise Sources
M1	Project Site – Northeastern Corner	11:07 a.m. – 11:22 a.m.	59.8	Intermittent traffic on Fallbrook Avenue, distant traffic on Roscoe Boulevard, and occasional driveway traffic.
M2	Project Site – Eastern Boundary	10:19 a.m. – 10:34 a.m.	58.3	Traffic on Roscoe Boulevard and Fallbrook Avenue.
M3	Project Site – Southern Boundary	9:16 a.m. – 9:31 a.m.	65.6	Traffic on Roscoe Boulevard.

Source: Envicom Corporation, field visit Thursday June 10, 2021. Measured using a Larson Davis LxT Sound Level Meter meeting the American National Standards Institute (ANSI) S1.4 Type 1/Class 1 standard.

^a Leq is the average noise level of the time period.

Note: During the noise measurements, temperatures in the Project vicinity ranged from 73° Fahrenheit (F) to 81° F, humidity ranged from 16% to 23%, and maximum wind speeds ranged from 11 miles per hour (mph) to 12 mph.

Construction Noise Impacts

Section 41.40(a) of the LAMC limits construction activities to the hours of 7:00 a.m. and 9:00 p.m. on weekdays. Additionally, Section 41.40(c) of the LAMC prohibits construction work or earth grading activities before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday nor at any time on any Sunday.

Pursuant to LAMC Section 112.05, construction equipment noise levels are restricted to 75 dBA at 50 feet from the source unless compliance is “technically infeasible” despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.

The Construction Noise Handbook prepared by the Federal Highway Administration (FHWA) includes a national database of construction equipment noise levels. The FHWA uses these reference noise levels in the Roadway Construction Noise Model. **Table XIII-2, Construction Equipment Noise Levels**, identifies the highest (Lmax) noise levels associated with the equipment types anticipated to be used for construction of the Project at a distance of 50 feet between the equipment and receptor.

According to the FHWA, reductions of 10 dBA or more can be achieved with optimal muffler systems for construction equipment.⁵² Additionally, temporary construction noise barrier equipment available from a variety of manufacturers/suppliers would be capable of reducing construction equipment noise by approximately 15 dB.⁵³ As the Project would be required to provide feasible construction noise reduction measures pursuant to LAMC Section 112.05 as well as the applicable [Q] conditions of approval, Table XIII-2 also shows the noise reduction levels anticipated to result from use of standard noise reduction techniques.

⁵² Federal Highway Administration (FHWA), Special Report – Measurement, Prediction, and Mitigation, updated June 2018, accessed June 23, 2021, at: https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

⁵³ Acoustic Surfaces Inc., Echo Barrier Product Specs, Accessed on June 23, 2021, at: <http://www.acousticalsurfaces.com/temporary-barrier/echo-barrier.html>

Table XIII-2
Construction Equipment Noise Levels

Equipment	Lmax at 50 ft (dB) ^a	Reduction Feature ^b and Attenuation (dB)	Reduced Lmax at 50 ft (dB)	Exceeds 75 dB at 50 ft (Yes/No)
Concrete/Industrial Saw	90	Barrier (15 dB)	75	No
Excavator	81	Muffler (10 dB)	71	No
Dozer	82	Muffler (10 dB)	72	No
Loader	79	Muffler (10 dB)	69	No
Tractors/Loaders/Backhoe	79	Muffler (10 dB)	69	No
Grader	85	Muffler (10 dB)	75	No
Excavator	81	Muffler (10 dB)	71	No
Crane	81	Muffler (10 dB)	71	No
Forklift	75	Muffler (10 dB)	65	No
Generator Set	81	Muffler (10 dB)	71	No
Welder	74	Barrier (15 dB)	66	No
Paver	77	Muffler (10 dB)	67	No
Paving Equipment	83	Muffler (10 dB)	73	No
Roller	80	Muffler (10 dB)	70	No
Air Compressor	78	Barrier (15 dB)	59	No
Source: Envicom Corporation, June 2021.				
^a Federal Highway Administration, Construction Noise Handbook, 2006, Chapter 9, Construction Equipment Noise Levels and Ranges.				
^b Pursuant to LAMC Section 112.05, the Project would be required to incorporate use of mufflers, acoustical blankets, enclosures, barriers, screens and/or other feasible noise reduction device or techniques during the operation of the equipment.				

As shown in Table XIII-2, construction equipment noise would not exceed 75 dB at 50 feet with use of standard noise reduction features which would comply with the LAMC Section 112.05 restrictions on construction equipment noise levels. The closest sensitive receptors that could potentially be subject to construction-related noise from the Project Site would be existing residences that are located east of Fallbrook Avenue, approximately 100 feet from the Project boundary. As noise levels are attenuated by approximately 6 dB for every doubling of distance from a source, construction noise levels at the nearest residences would be approximately 6 dB less than the Lmax levels at 50 feet reported in Table XIII-2. Additionally, the hourly average (Leq) noise levels generated by the Project's construction equipment would be less than the Lmax levels shown in Table XIII-2, as construction equipment pieces do not constantly operate at full power during typical construction activities. In addition, construction would occur throughout the Project Site and would not be concentrated or confined in the area directly adjacent to sensitive receptors. Therefore, construction noise would be acoustically dispersed throughout the Project Site and not concentrated in one area near adjacent sensitive uses for prolonged time periods.

The Project would be required to implement the [Q] Qualified Conditions of Approval Environmental Conditions #17 through #20 that specify feasible noise reduction techniques during construction for compliance with the regulatory requirements of the LAMC. **Regulatory Compliance Measure RC-NOI-1: Increased Noise Levels (Demolition, Grading, and Construction Activities)** includes each of the construction noise reduction requirements specified in the Project's [Q] Conditions, and additionally specifies placement of a temporary construction noise barrier to ensure feasible noise reduction techniques are implemented during construction pursuant to LAMC Section 112.05.

Regulatory Compliance Measure RC-NOI-1: Increased Noise Levels (Demolition, Grading, and Construction Activities)

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- A temporary noise control barrier shall be installed on the property line of the construction Site's abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10 A-weighted decibels (dBA). The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all activities on the Project Site are complete.

As the Project would be required to comply with the City's construction noise restrictions pursuant to the LAMC (and the Site's [Q] conditions of approval), including allowable hours and use of feasible noise reduction features, and as the Project would incorporate standard noise reductions that would reduce noise levels to below 75 dB at 50 feet, which would not exceed the City's code requirement for construction noise levels, temporary construction noise impacts would be less than significant.

Operational Impacts

Traffic Noise

To determine if the Project's vehicle trip generation would substantially increase traffic noise in the Project Site vicinity, traffic noise levels on the local roadway segments were modeled in the FHWA Traffic Noise Model 3.0 (FHWA TNM 3.0). The Project's Transportation Assessment provided a.m. and p.m. peak-hour intersection turn volumes on local roadways in the Project vicinity for the Existing (2021), Existing With Project, Future Cumulative Baseline, and Future Cumulative with Project conditions.⁵⁴ Due to the COVID-19 pandemic, the Transportation Assessment used historical traffic counts with appropriate adjustments to represent baseline volumes, consistent with LADOT guidance. The p.m. peak-hour intersection turn volumes were tabulated into roadway segments and multiplied by a standard factor of 10 to obtain Average Daily Trips (ADT). To model baseline existing traffic noise, the percentage of roadway traffic comprised of truck trips was based on noise modeling data assumptions used in the County of Los Angeles General Plan EIR⁵⁵ as it reflects similar development patterns and land uses as the existing conditions in the Project vicinity and because equivalent data was not available for the City. This data predates the COVID-19 pandemic and thus represents a typical, non-pandemic baseline.

The Project's Transportation Assessment⁵⁶ determined that the Project would generate 421 net new ADT. Of these 421 trips, there would be approximately 45 heavy truck trips per day based on rates from the ITE Trip Generation Manual, 10th Edition Supplement.⁵⁷ The heavy truck percentages on roadway segments for the evaluated scenarios with Project development were adjusted from the previously discussed baseline

⁵⁴ Linscott, Law, & Greenspan Fallbrook Point Transportation Assessment, September 14, 2021.

⁵⁵ County of Los Angeles, General Plan Update Draft Environmental Impact Report, State Clearinghouse No. 2011081042, Appendix K-3: Roadway Noise Analysis Details, Existing Conditions, Page 45, June 2014.

⁵⁶ Linscott, Law, & Greenspan Fallbrook Point Transportation Assessment, September 14, 2021.

⁵⁷ Linscott, Law, & Greenspan, email correspondence to Envicom, June 3, 2021.

percentages. **Table XIII-3, Traffic Noise Levels**, shows the Project-related traffic noise increase relative to the modeled existing conditions and the cumulative traffic noise increase (Project buildout year with related projects and ambient growth compared to existing year without Project conditions).

**Table XIII-3
Traffic Noise Levels**

Roadway Segment	Existing (2021) ADT	Existing Traffic Noise ^a (dB CNEL)	Existing With Project ADT	Existing With Project Noise (dB CNEL)	Existing Year (2021) Project-Related Traffic Noise Increase (dB CNEL)	Future Cumulative (Year 2023 ^b) With Project ADT	Future Cumulative With Project Noise Level (dB CNEL)	Future Cumulative Traffic Noise Increase (dB CNEL)
Roscoe Blvd east of Roscoe driveway	11,900	66.8	12,000	66.8	0.0	12,510	67.0	0.2
Roscoe Blvd west of Fallbrook Ave	12,430	67.0	12,540	67.0	0.0	13,060	67.2	0.2
Fallbrook Ave south of Fallbrook driveway	4,610	61.5	4,870	61.8	0.3	6,210	62.9	1.4
Fallbrook Ave north of Schoenborn St	4,610	61.5	4,870	61.8	0.3	7,130	63.5	2.0
Fallbrook Ave south of Schoenborn St	4,390	61.3	4,650	61.6	0.3	7,820	63.9	2.6
Fallbrook Ave north of Roscoe Blvd	2,970	62.6	3,230	63.2	0.6	5,460	65.3	2.7
Source: Envicom Corporation, June 2021. Traffic Noise modeled in FHWA TNM 3.0 based on traffic data from Linscott, Law, & Greenspan Fallbrook Point Transportation Assessment, September 14, 2021; vehicle mix was based on the County of Los Angeles General Plan Environmental Impact Report and truck trip rates provided by Linscott, Law, & Greenspan by email correspondence on June 3, 2021.								
^a Noise levels at a distance of 50 feet from the centerline of the outermost travel lane.								
^b Project buildout year. Traffic volumes for this year include related projects and ambient growth.								

As Table XIII-3 shows, the Project would increase noise levels on local roadways by 0.6 dB CNEL or less compared to an existing year baseline. A comparison of traffic noise levels under future conditions with Project buildout, related projects, and ambient growth to existing traffic noise levels indicates that cumulative noise increases on local roadways would be 2.7 dB CNEL or less in the existing year, as Table XIII-3 also shows. A noise level increase of less than 1 dB CNEL (i.e, time-weighted average noise levels over 24-hours) would not perceptibly increase 24-hour average noise levels to the human ear, even in a

controlled laboratory environment and an increase of less than 3 dB CNEL would not perceptibly increase 24-hour average noise levels to the human ear in an outdoor environment. Therefore, traffic-related permanent increases in ambient noise levels would be less than significant.

Truck Deliveries and Loading and Unloading

The buildings, site plan, and operations have all been designed to reduce noise to adjacent uses. The Project's Site Plan shows 10 truck docks distributed in groups of two between the three buildings, as shown on Figure 3-4, Site Plan. The Project has been designed with the truck dock doors facing the interior of the Site, and with portions of the proposed structures shielding the truck dock bays from residential uses in the vicinity. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse buildings, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Outdoor activities would be limited and include regular Site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

Noise from truck deliveries would include onsite maneuvering of trucks at low speeds and idling. Title 13 California Code of Regulations, Section 2485 prohibits idling of diesel fueled commercial motor vehicles weighing above 10,000 pounds for more than five minutes. This analysis assumes that a typical truck delivery would involve five minutes of cumulative idling and low-speed maneuvering within the dock areas.

LAMC Section 114.03 prohibits loading or unloading within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day. As none of the proposed truck docks are within 200 feet of residential buildings, LAMC Section 114.03 restrictions on the hours of use of the loading docks would not be applicable for this Project. Additionally, Case No. CPC 2007-237-ZC-GPA-CU-SPR, Condition of Approval No. B.3 for the Commercial Corner Exceptions requires: (i) truck deliveries/distribution hours/days to be: M-F 6 AM to 7 PM, Sat – 7 AM to 5 PM, and Sun 10 AM to 4 PM; and (ii) primary access to and egress from the Project Site for truck deliveries/distribution (3 or more axles that are greater than 10,000 pounds gross vehicle weight) to be taken from the Roscoe Boulevard entrance. Pursuant to Case No. CPC 2007-237-ZC-GPA-CU-SPR, Condition of Approval No. B.3 for the Commercial Corner Exceptions, trucks accessing the Site would enter primarily from Roscoe Boulevard. As shown on Figure 3-4 the primary internal driveway circulation driveway/parking lot aisles are located to the south and east of the proposed buildings, which lead to additional driveway/parking lot aisles between the proposed buildings where truck docks would be located.

As discussed previously, the existing (baseline) ambient noise levels in the vicinity of the nearest residences along Fallbrook Avenue to the east range from 58.3 dB Leq to 59.8 dB Leq, and the existing ambient noise level at the nearest residences along Roscoe Boulevard to the south is 65.6 dB Leq. Pursuant to the LAMC Section 114.02(a)3, the Project would not be allowed to generate noise levels from onsite vehicle use that result in a 5-dB increase over the existing noise levels at the property line of adjacent residential uses.

Typical truck dock noises, including backup alarms, would generate noise levels of approximately 75 dB Lmax at 50 feet. The closest sensitive receptors to the loading docks are the residences to the east, the nearest of which is approximately 290 feet from the nearest loading dock, where noise levels would be attenuated by 15.3 dB due to distance. The structure of the Project building would further reduce noise levels by 15 dB based on guidance from the FHWA RCNM Construction Noise Handbook.⁵⁸ The final resulting noise level would be 44.7 dB at the nearest sensitive receptor (i.e., 75 dB – 15.3 dB – 15 dB = 44.7 dB). A noise level of 44.7 dB at the nearest residences would result in a 0.2 dB increase above the

⁵⁸ U.S. Department of Transportation, Federal Highway Administration, Construction Noise Handbook, Final Report, Report No. FHWA-HEP-06-015, August 2006.

baseline ambient noise level of 58.3 dB Leq (i.e., $10 \cdot \log(10^{44.7 \text{ dB}/10} + 10^{58.3 \text{ dB}/10}) = 58.5 \text{ dB}$; $58.5 \text{ dB} - 58.3 \text{ dB} = 0.2 \text{ dB}$). This noise level would not exceed the ambient noise level at the nearest residences to the east by more than 5 dB, in compliance with the LAMC. In addition, a noise level increase of less than 1 dB would not be perceptible to the human ear, even in a controlled laboratory setting.

The following discussion analyzes the effects of multiple truck deliveries on average ambient noise levels over a longer period of time. Based on square footage of proposed warehouse, manufacturing, and office uses and trip generation rates from the ITE Trip Generation Manual, 10th Edition Supplement,⁵⁹ the Project would generate approximately 44.9 one-way truck trips per day. These trips would be associated with a total of 22.4 individual trucks being unloaded/loaded on the Site in a day with an average of three individual trucks per hour in an eight-hour workday. Based on five aggregate minutes in an hour for truck maneuvering to access an individual dock door, 75 dB Lmax at 50 feet would be equivalent to an hourly average of 64.2 dB Leq.⁶⁰ As a conservative assessment, this analysis evaluates noise levels if three trucks would arrive at/depart from the three truck docks located nearest to offsite sensitive receptors. Loading dock noise levels at the nearest residences to the east are shown on **Table XIII-4, Loading Dock Noise Levels**.

Table XIII-4
Loading Dock Noise Levels

Loading Dock Location ^a	Reference Maximum Truck Noise Level at 50 ft ^b (dB)	Usage Factor ^c (%)	Average Truck Delivery Noise Level at 50 ft (dB Leq)	Distance to Nearest Receptor ^d (ft)	Distance Attenuation (dB)	Insertion Loss ^e (dB)	Noise Level at Sensitive Receptor (dB Leq)
5	75	8.33	64.2	300	15.6	15	33.6
6	75	8.33	64.2	290	15.3	15	33.9
10	75	8.33	64.2	380	17.6	15	31.6
Total							37.9
^a For the purpose of this analysis, loading docks shown on the Site Plan were assigned numbers in order from left to right, top to bottom. Using this numbering system, Dock 5 and Dock 6 would be located near the southeast corner of the middle building (Building 2) and Dock 10 is located on the north side of the southernmost building (Building 1). ^b Illingworth and Rodkin, Inc., <i>Shoe Palace Expansion Project Noise and Vibration Assessment</i> , September 11, 2018. ^c Acoustical Usage Factor, representing the percentage of an hour in which a truck would operate at this location. ^d Residences nearest to loading docks, represented by 8344 Fallbrook Avenue. ^e Insertion loss due to the Project building designs' recessed dock areas block or deflect onsite truck noise, based on guidance from U.S. Department of Transportation, Federal Highway Administration, <i>Construction Noise Handbook, Final Report</i> , Report No. FHWA-HEP-06-015, August 2006.							

Accounting for attenuation based on the source-receptor distance for each truck dock door, as well as the proposed structure itself, with the hourly use of three truck dock doors the average noise level at the closest residence would be 37.9 dB Leq over an hour, which results in no measurable increase over existing noise levels (i.e., $10 \cdot \log(10^{37.9 \text{ dB}/10} + 10^{58.3 \text{ dB}/10}) = 58.3 \text{ dB}$; $58.3 \text{ dB} - 58.3 \text{ dB} = 0.0 \text{ dB}$). Thus, the Project's loading dock noise would not result in a noticeable increase above existing ambient noise levels or an increase of 5 dB over existing conditions, pursuant to the LAMC and impacts associated with these activities would be less than significant.

Trucks accessing the Site would enter primarily from Roscoe Boulevard and travel along the internal circulation driveway/parking lot aisles to the south and east of the proposed buildings to driveway/parking lot aisles between the proposed buildings where truck docks would be located as shown on Figure 3-4.

⁵⁹ Linscott, Law, & Greenspan, email correspondence to Envicom, June 3, 2021.

⁶⁰ $Leq = Lmax - 20 \cdot \log(D/50) + 10 \cdot \log(U.F./100)$, where U.F. is the acoustical usage factor representing the percentage of a given time period that the noise level occurs.

Based on noise modeling using FHWA TNM 3.0, three heavy truck round-trips per hour traveling through the eastern drive aisle at 15 miles per hour would generate an hourly average noise level of 49.6 dB Leq at the nearest residence to the east, which is approximately 150 feet from the edge of the nearest Project parking lot drive aisle. A noise level of 49.6 dB Leq at the nearest residences would result in an increase of 0.5 dB above the existing ambient noise level of 58.3 dB Leq (i.e., $10 \cdot \log(10^{49.6 \text{ dB}/10} + 10^{58.3 \text{ dB}/10}) = 58.8 \text{ dB}$; $58.8 \text{ dB} - 58.3 \text{ dB} = 0.5 \text{ dB}$). Therefore, the Project's internal truck traffic noise would not result in an increase of 5 dB over existing conditions, pursuant to the LAMC. In addition, a noise level increase of less than 1 dB would not be perceptible to the human ear, even in a controlled laboratory setting. Therefore, impacts associated with these activities would be less than significant.

As the Project's truck deliveries and loading and unloading would not result in a noticeable increase in ambient noise levels and would not increase the ambient noise level at nearby residences by more than 5 dBA in compliance with the LAMC, impacts associated with these activities would be less than significant.

Heating, Ventilation, and Air Conditioning Noise

Pursuant to LAMC Section 112.02, the Project would be considered to exceed operational Noise Ordinance standards if it would increase the ambient noise level on another property by more than 5 dB. During operations, the Project's rooftop Heating, Ventilation, and Air Conditioning (HVAC) units could potentially be a source of noise affecting existing ambient noise levels in the immediate vicinity. This analysis assumes that the Project would include seven HVAC units for each of the seven potential office use areas of the three buildings, with an additional five larger HVAC units to serve the warehouse/manufacturing use areas. As the placement of Project HVAC units is unknown, it was also conservatively assumed that these HVAC units could be placed near the rooftop edges closest to the sensitive receptors. As the manufacture and model of HVAC units to be installed is not known at this time, this evaluation considers the potential effects of operating HVAC units of a type and size that would represent a typical application for office and light industrial uses, which can generate noise levels of approximately 67.0 dB or 83.0 dB Leq at a distance of 3.3 feet, respectively when mounted on rooftops.

This analysis conservatively evaluates potential noise effects in the event that all HVAC units would operate simultaneously, although actual HVAC use would depend on weather conditions, occupancy, and occupant preferences. In addition, the roofline and parapet along the exterior walls of the buildings would likely provide additional noise reduction beyond the levels evaluated here. Noise levels from the Project's HVAC at the nearest residences are shown on **Table XIII-5, HVAC Noise Levels at Nearest Residences**.

**Table XIII-5
HVAC Noise Levels at Nearest Residences**

Land Use	Building ^a	Reference Noise Level ^{b, c} (dB)	Reference Distance (ft)	Receptor Distance (ft)	Distance Attenuation (dB)	Attenuated Noise Level (dB)
Industrial	3	83.0	3.28	260	38.0	45.0
Industrial	2	83.0	3.28	210	36.1	46.9
Industrial	2	83.0	3.28	320	39.8	43.2
Industrial	1	83.0	3.28	290	38.9	44.1
Industrial	1	83.0	3.28	480	43.3	39.7
Office	3	67.0	3.28	250	37.6	29.4
Office	2	67.0	3.28	200	35.7	31.3
Office	2	67.0	3.28	290	38.9	28.1
Office	2	67.0	3.28	350	40.6	26.4
Office	1	67.0	3.28	280	38.6	28.4

Land Use	Building ^a	Reference Noise Level ^{b, c} (dB)	Reference Distance (ft)	Receptor Distance (ft)	Distance Attenuation (dB)	Attenuated Noise Level (dB)
Office	1	67.0	3.28	450	42.7	24.3
Office	1	67.0	3.28	610	45.4	21.6
Total	--	--	--	--	--	51.5

Source: Reference noise levels from: York, Specifications for Single Package R-410A Air Conditioner, 2019 and York, LX Series PCG4 - 14 SEER Single Pkg. G/E R-410A AC.

^a Building 1 is the southernmost proposed building, Building 2 would be central to the Site, and Building 3 is the northernmost proposed building

^b For this evaluation, York LX Series 2.5 Ton HVAC units were assumed for portions of the proposed buildings that are for office use, and York Predator 3-12.5 units were assumed for portions of the proposed buildings for light industrial use. Note: As the actual HVAC manufacturer, models, number of units, and placement are not known at this time.

^c Manufacturer specified sound power levels of 91 dB and 75 dB are equivalent to sound pressure levels of 83 dB at 3.28 ft and 67 dB at 3.28 ft, respectively, with half-spherical propagation due to roof mounting.

At the nearest residences to the east, a combined HVAC noise level of 51.5 dB would result in an increase of 0.8 dB above the measured ambient noise level of 58.3 dB at M2 (i.e. $10 \cdot \log(10^{51.5 \text{ dB}/10} + 10^{58.3 \text{ dB}/10}) = 59.1 \text{ dB}$; $59.1 \text{ dB} - 58.3 \text{ dB} = 0.8 \text{ dB}$). Therefore, operational HVAC noise would not exceed the ambient noise level at the property boundary to the north or west by more than 5 dB, in compliance with LAMC Section 112.02. In addition, a noise level increase of less than 1 dB would not be perceptible to the human ear, even in a controlled laboratory setting. The residences to the south are further away from the closest proposed building and have higher ambient noise levels under existing conditions, resulting in an even lower Project-related noise increase from HVAC. The property boundaries to the north and west are not occupied by noise sensitive uses. Therefore, HVAC noise effects would be less than significant.

Landscape Maintenance Noise

During operations, the Project could result in the periodic use of landscaping maintenance equipment such as backpack blowers, hedge trimmers, etc., for upkeep around the Site perimeter. Landscaping contractors would reasonably be expected to conduct routine maintenance during daytime hours, therefore avoiding the period when such equipment noise is restricted between 10:00 p.m. and 7:00 a.m. as required by LAMC Section 112.04. Therefore, the Project's potential noise effects due to periodic routine maintenance of outdoor landscaping would be less than significant.

Composite Operational Noise Levels

The various operational noise sources from the Project may operate at the same time. The following analysis evaluates the noise level increase above the existing measured daytime off-peak average ambient noise levels, which represent a conservative baseline. Additionally, most of the Project activity would occur during the daytime, resulting in a conservative analysis. The Project-related increase in hourly average noise levels from the composite total of the Project's operational activities at the nearest noise sensitive receptor are shown on **Table XIII-6, Project-Related Composite Operational Noise Level Increase**. As shown on Table XIII-6, the resulting composite operational noise levels would result in an increase of less than 3 dB Leq in average hourly daytime off-peak noise levels, which would not be a perceptible increase above baseline ambient noise levels, given the period of time over which this noise level increase would be distributed and would not exceed the LAMC threshold of a 5 dB increase above the ambient noise level at the nearest residences to the east. Project-related noise level increases at the residences to the south would be lower because they are further away and have higher existing ambient noise levels.

Table XIII-6
Project-Related Composite Operational Noise Level Increase

Existing Ambient Noise Level (dB Leq)	Existing Year Project-Related Traffic Noise Increase	Loading Dock Noise (dB)	Truck Delivery Noise (dB)	HVAC Noise (dB)	Total Noise Level (dB)	Project-Related Noise Level Increase (dB)	Increase Exceeds 5 dB Threshold?
58.3	0.6	37.9	49.6	51.5	60.1	1.8	No

Table XIII-7, Cumulative Composite Operational Noise Level Increase shows that the composite cumulative noise increase in average hourly noise levels (i.e., Leq) would be less than 5 dB, which would not exceed the LAMC threshold of a 5 dB Leq increase above the average ambient noise level at the nearest residences to the east over an average hour during the daytime off-peak time period. Therefore, composite operational noise impacts would be less than significant. In addition, a less than 5 dB Leq increase in hourly average noise levels would not be readily perceptible to the human ear in an outdoor environment.

Table XIII-7
Cumulative Composite Operational Noise Level Increase

Existing Ambient Noise Level (dB Leq)	Future Cumulative Traffic Noise Increase	Loading Dock Noise (dB)	Truck Delivery Noise (dB)	HVAC Noise (dB)	Total Noise Level (dB)	Cumulative Noise Level Increase (dB)	Increase Exceeds 5 dB Threshold?
58.3	2.7	37.9	49.6	51.5	61.8	3.5	No

Conclusion

As discussed in the above evaluations, the Project's potential noise impacts from construction and operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A significant noise impact could occur if a project would expose people to or generate excessive groundborne vibration or groundborne noise levels. Construction activities generate ground-borne vibration when heavy equipment travels over unpaved surfaces or is engaged in soil movement. The effects of ground-borne vibration may include discernable movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Ground vibration is quickly damped out within the softer sedimentary surfaces of much of Southern California. Because vibration is typically not an issue, very few jurisdictions have adopted vibration significance thresholds. Vibration thresholds have been adopted for major public works construction projects, but these relate mostly to structural protection (cracking foundations or stucco) rather than to human annoyance.

A vibration descriptor commonly used to determine structural damage is the PPV, which is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second (in/sec). Caltrans provides criteria for determining the potential for structural damage to various types of structures.⁶¹ According to the City's ZIMAS, the nearest residences were generally constructed in the 1950's, 1960's and 1970's.⁶² As some of the residences were constructed in the 1950's, this evaluation

⁶¹ California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020.

⁶² City of Los Angeles, Department of City Planning, Zoning Information and Map Access System (ZIMAS). Accessed on June 21, 2021, at: <http://zimas.lacity.org/>.

will be based on the Caltrans criterion for vibration levels to cause structural damage for older residential structures, which is 0.3 PPV in/sec and the Caltrans criterion for vibration levels to cause structural damage for modern industrial/commercial buildings, which is 0.5 PPV in/sec.

The onsite construction equipment used in construction of the Project that would create the maximum potential vibration is a large bulldozer. The stated vibration source level for such equipment is 0.089 PPV in/sec at 25 feet from the source, according to the FTA's Transit Noise and Vibration Impact Assessment Manual.⁶³ The nearest structure to the Project is an industrial building located 60 feet west of the property boundary and the nearest residential structures are located at distances of approximately 100 feet east of the property boundary. The predicted vibration levels generated by construction equipment at the nearest residence and whether potential structural damage could occur are shown in **Table XIII-8, Construction Activity Vibration Effects**.

Table XIII-8
Construction Activity Vibration Effects

Receptor	Construction Equipment	Reference Vibration Levels at 25 ft	Vibration Levels at Nearest Structure		Vibration Damage Impact Assessment	
		Peak Particle Velocity (PPV) at 25 ft (in/sec)	Distance (ft)	Peak Particle Velocity (in/sec)	Threshold: Peak Particle Velocity (in/sec)	Exceedance ?
Residence	Large Bulldozer	0.089	100	0.011	0.3	No
	Loaded Trucks	0.076	100	0.010	0.3	No
Industrial Building	Large Bulldozer	0.089	60	0.024	0.5	No
	Loaded Trucks	0.076	60	0.020	0.5	No

Source: Envicom Corporation, June 2021. Calculations are based on equations from Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

As shown on Table XIII-8, the Project's highest construction vibration effects at the closest structure would be 0.024 PPV in/sec, which would be below levels that could create structural damage in modern industrial/commercial buildings. At the closest residences, which according to the City's ZIMAS⁶⁴ were generally constructed in the 1950's, 1960's and 1970's, the Project's construction activities would generate vibration effects of approximately 0.011 PPV in/sec, which would be below levels that could create structural damage in older residential structures. As the Project's vibration impacts would not result in structural damage, and due to the temporary and intermittent occurrence of vibration levels, structural and human annoyance vibration impacts would be considered less than significant.

Mitigation Measures: No mitigation measures are required.

c. No impact. A project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would have a potentially significant impact if it would cause people residing or working in the area to be exposed to excessive noise levels. The nearest airport or airstrip to the Project Site is Van Nuys Airport (approximately 7.5 miles to the east). As such, the Project would not be located within two miles of a public airport or public use airport or in the vicinity of a private airstrip. Additionally, the Project Site is located

⁶³ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

⁶⁴ City of Los Angeles, Department of City Planning, City's Zone Information and Map Access System (ZIMAS), Accessed on June 21, 2021, at <http://zimas.lacity.org/>.

beyond the airport's 65 dB CNEL contours.⁶⁵ Therefore, the Project would have no impact regarding this issue.

Mitigation Measures: No mitigation measures are required.

⁶⁵ Los Angeles County Airport Land Use Commission, Van Nuys Airport: Airport Land Use Compatibility Plan, 2003. Accessed on June 11, 2021, at <https://planning.lacounty.gov/aluc/airports>.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING.

Would the project:

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

a. Less Than Significant Impact. A project could have a significant environmental impact if it would induce substantial unplanned population growth in an area, either directly or indirectly. The Project would add three light industrial buildings with a total of 98,614 square-feet of floor area to the existing corporate business campus. The existing business park is currently served by existing utilities and is access by existing arterial roadways. Therefore, no new or extended roads or infrastructure would be required to serve the Project, the construction of which could indirectly induce substantial growth in the area.

The proposed buildings would provide 56,114 square feet for warehousing, 19,000 square feet for manufacturing, and 23,500 square feet for office use. Although utilization of the buildings may vary, as proposed the Project could potentially accommodate approximately 211 employees.⁶⁶

The SCAG 2020-2045 Regional RTP/SCS⁶⁷ projected growth in population and employment from 2016 through 2045 for the City is shown in **Table XIV-1, Population and Employment Growth Forecast.**

**Table XIV-1
Population and Employment Growth Forecast**

Year	Population	Employment
2016 ^(a)	3,933,800	1,848,300
2045	4,771,300	2,135,900
Growth	837,500	287,600

Source: Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Technical Report, Table 14, Jurisdictional-Level Growth Forecast.
^(a) 2016 is the base year data used in the 2020-2045 RTP/SCS.

As shown in Table XIV-1, SCAG forecasts employment in the City of Los Angeles to increase from 2016 to 2045 by 287,600 jobs, of which the estimated number of employees accommodated by the Project would represent less than one tenth of one percent (0.08 percent).

⁶⁶ According to United States Green Building Council, Building Area per Employee by Business Type, May 13, 2008. Warehouse, manufacturing, and office use area per employee of 781, 535, and 228 square feet, respectively.

⁶⁷ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 3, 2020.

As the Project-related employment would be within local and regional projections and would not induce substantial indirect growth, the Project's potential impact associated with population growth would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A project could have a significant environmental impact if it would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere. There is no housing on the Project Site and construction of the buildings will not interfere with housing in any manner. Therefore, the Project would not result in the displacement of existing housing units or people, and it would therefore have no impact regarding this issue.

Mitigation Measures: No mitigation measures are required.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES.

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

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a. Less Than Significant Impact. A project could have a significant environmental impact if it would the need for a new or physically altered fire station, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

LAMC Section 57.507.3.3 indicates that fire protection services for industrial and commercial land uses would be adequate if a site is located within one mile of an engine company and within 1.5 miles of a truck company without the addition of fire sprinklers.⁶⁸ Fire Station 106 is located at the southwest corner of the intersection at Roscoe Boulevard and Lena Avenue, across the street from the campus. Lena Avenue leads directly into the campus, and a secondary entrance that leads directly to the Project Site is approximately 700 feet from Fire Station 106, with the Project Site itself approximately 1,000 feet away. In addition, Fire Stations 72, 96, 104, and 105 are all within 3 miles of the Site, with Station 105 just over 2 miles away in a straight line, directly on Fallbrook Avenue. Although multiple stations are close, none house a truck company, however current safety codes would require installation of a fire sprinkler system regardless. Pursuant to the Site’s [Q] Qualified Conditions of Approval Environmental Condition #37:

37. Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit. The applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project. Definitive plans and specifications shall be submitted to the Los Angeles Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project. Any required fire hydrants to be installed shall be fully operational and accepted by the Los Angeles Fire Department prior to any building construction. Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the

⁶⁸ Los Angeles Municipal Code, Article 7 Fire Code, Section 57.507.3.3. LAND USE, Table 57.507.3.3.

Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (CPC 19708). All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the LAMC.

As such, the Project would be required to submit plans to the LAFD for review and approval of all fire prevention and safety features and given required compliance with City code and close proximity to LAFD stations the Project would not require new construction or expansion of existing fire stations, and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A project could have a significant environmental impact if it would require new or expanded police station facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives.

The Project Site is located in the Topanga division of the Los Angeles Police Department's (LAPD's) Valley Bureau. The Topanga Community Police Station, located approximately 1.4 miles east of the Project Site.⁶⁹ Within the Topanga Area, the Project Site is located within Reporting District 2102.⁷⁰

Emergency calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, the distance between a headquarters facility and the location of a particular emergency does generally not determine response time. Instead, the number of police officers on the street is more directly related to the realized response time.

Construction

During construction, the Project Site could potentially attract trespassers and/or vandals that could result in unsafe conditions for the public. The Project would be required to limit access to the Site during construction to address potential trespass on the Site. Pursuant to LAMC Chapter 1, Section. 14.4.17.F.3, it would be the applicant's responsibility to remove graffiti from temporary construction walls and/or solid wood fences during construction. Due to the temporary nature of construction activities, the Project would not require the construction or expansion of police facilities to serve the Site or maintain service response times during construction, and impacts would be less than significant.

Operation

The Project would add three light industrial buildings to the existing corporate business campus. The buildings will allow more business development and activity in the campus but are not of a scope or size to induce population growth in the area as discussed in Section XIV, and therefore would not impact service ratios. The businesses themselves should require no more police attention than what is already provided and should not induce any new criminal activity. According to the LAPD's crime data mapping source, there have been no reported incidents on or in regard to the campus in the last 5 months.⁷¹

⁶⁹ Los Angeles Police Department, Topanga Community Police Station, Accessed on June 2, 2021, at: https://www.lapdonline.org/topanga_community_police_station.

⁷⁰ Los Angeles Police Department, Topanga Area Senior Lead Officer Map, Accessed on June 2, 2021, at: <http://lapd-assets.lapdonline.org/assets/pdf/Slo%20map%202019%20with%20PICS.pdf>

⁷¹ Los Angeles Police Department, Crime Mapping and COMPSTAT data from 1/1/2021 to 6/1/2021, accessed June 2, 2021, at <https://www.crimemapping.com/map/ca/losangeles>.

Pursuant to the Site's [Q] Qualified Conditions of Approval Environmental Condition #39:

39. *The applicant shall consult with the Los Angeles Police Department and comply with recommended security features for the construction site, including security fencing, locked entrances and lighting. Upon completion of the project, the applicant shall provide the Devonshire Division Commanding Officer with a diagram of each portion of the project site, including access routes and other information that might facilitate police response, as requested by the LAPD. The applicant shall provide project plans to the LAPD Crime Prevention Unit to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD. The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed. The applicant is referred to Design Out Crime Guidelines: Crime Prevention Through Environmental Design (CPTED) published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 150 North Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. The CPTED operates on three key concepts: 1) Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility; 2) Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting; and 3) Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.*

Operations within the new buildings should not change the nature of the existing business park campus. Therefore, the Project would not require new or expanded police station facilities, ensuring impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A project could have a significant environmental impact if it would require new or expanded school facilities, the construction of which could cause significant environmental impacts, to maintain acceptable enrollment/capacity levels of the Los Angeles Unified School District. As discussed above in Section XIV(a), The Project is not of sufficient scale or scope to induce population growth. It is not expected to attract a significant number of new residents from outside the City, or cause a significant number of residents from elsewhere in the City to relocate, and thusly will not create the need for expanded school facilities. Therefore, the Project would not result in a need for new or expanded school facilities, the construction of which could result in a physical impact on the environment, and would have no impact to schools.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A project could have a significant environmental impact if it would require new or expanded parks, the construction of which could cause significant environmental impacts, in order to accommodate a population increase resulting from the Project. As discussed above, the Project is not expected to induce residential growth. Without a substantial increase in residential growth, there would be no need for new or expanded parks. Therefore, the Project would not substantially increase the demand for existing recreation and park services that would require new or expanded park facilities, and there would be no impacts to parks.

Mitigation Measures: No mitigation measures are required.

e. Less Than Significant Impact. A project could have a significant environmental impact if it would require new or expanded other public services in the vicinity, the construction of which could result in significant environmental impacts. As discussed above, because the Project would not be expected to induce population growth, there would be no expectation for a necessary increase in other public services. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

a. Less Than Significant Impact. A project could have a significant environmental impact if it would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project would not be expected to induce substantial population growth, and future employees at the Project Site would not be expected to utilize local parks while working at the Site. As such, the Project is not anticipated to substantially increase park usage and would not result in the substantial deterioration of physical facilities of local park and recreation facilities. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A project could have a significant environmental impact if it would include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. The Project would construct light industrial buildings for the conduct of business. The Project does not include recreational facilities and does not require new or expanded recreational facilities. Therefore, the Project would have no impact regarding this issue.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. TRANSPORTATION.

Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following section summarizes and incorporates the information provided in the Transportation Assessment for the Project,⁷² prepared by Linscott, Law & Greenspan, Engineers (LLG) in consultation with the Los Angeles Department of Transportation (LADOT). The Transportation Assessment follows the latest version of LADOT’s Transportation Assessment Guidelines (TAG), which identify vehicle miles traveled (VMT) as the primary metric for evaluating a project’s transportation impacts in compliance with CEQA. The Transportation Assessment is provided as **Appendix G**.

a. Less Than Significant Impact. A significant impact could occur if a project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, considering all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

Construction Traffic

During construction, the Project would temporarily require the use of haul trucks and other construction equipment and materials delivery vehicles that would use the roadway network in the vicinity, primarily traveling approximately one mile along Roscoe Boulevard between the Site and State Route 27 (Topanga Canyon Boulevard), and along State Route 27 approximately 3.9 miles to the north or 3.4 miles to the south to reach either the State Route 118 or U.S. 101 freeway, respectively. The Project would require import of approximately 6,000 cubic yards of soil materials during grading. Any oversized loads would require permitting from Caltrans to use state or federal highways. All equipment staging would occur on-site.

The Project’s construction traffic generation would be temporary in nature and would not be anticipated to contribute to a significant increase in the overall congestion of roadways in the Project vicinity. During construction, all equipment staging and worker parking would occur within the Project Site. All soil hauling would occur during daytime hours, and most trips would occur during off-peak hours. As hauling of

⁷² Linscott, Law & Greenspan, Engineers, Transportation Assessment Fallbrook Point, September 2, 2021.

equipment and materials to or from the Site during construction would be temporary in nature and would not generate substantial number of daily or peak hour vehicle trips, potential construction traffic effects would be less than significant.

Operational Project Impacts

The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users.⁷³ The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. According to the TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be consistent with these plans and policies.

The Project would not impede access to public transportation services along existing transportation routes, and it would not adversely affect existing bikeways or pedestrian facilities. The Project would redevelop an infill property currently occupied by a surface parking lot, with surrounding properties that are developed with residential, commercial, and light industrial uses. The Project Site is also located within walking distance of existing transit facilities, including an adjacent bus stop, and the nearby Metro G Line (Orange) busway and pedestrian/bike path along Canoga Avenue. Adjacent roadways have striped bike lanes in both directions in the vicinity of the Project. The Project would also include long-term bicycle parking racks and lockers within each of the proposed buildings for use by employees to encourage bicycle use by employees. The Project would retain existing sidewalks along Roscoe Boulevard and Fallbrook Avenue and would provide pedestrian access ramps (ADA compliant) to the Project from the existing sidewalks along both adjacent roadways. Existing signalized intersections with "continental" pedestrian crosswalks are located at the adjacent Roscoe Boulevard/Fallbrook Avenue intersection and the nearby Roscoe Boulevard/Lena Avenue intersection that enhance safety for pedestrian use in the vicinity. The Project would not interfere with or impede use of existing transit bus stops, including a Metro bus stop located at the Roscoe Boulevard/Fallbrook Avenue intersection that supports transit use in the vicinity.

The Project's Transportation Assessment (Appendix G) includes detailed responses for the TAG Plan Consistency Worksheet that provides a structured approach to evaluate whether a project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The Transportation Assessment responses to the TAG Plan Consistency Worksheet show that the Project would not conflict with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these plans, programs, ordinances, or policies. In addition, the Project would provide 262 off-street parking spaces distributed throughout the property, which exceeds the 150 off-street parking spaces required per Code (LAMC Section 12.21A.4).

As such, the Project would not conflict with transit, bicycle, or pedestrian facilities, and the Project's potential to substantially conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would conflict or be inconsistent with CEQA Section 15064.3 subdivision (b). SB 743 was enacted in September 2013, changing the way transportation impact analysis is conducted under CEQA. These

⁷³ Los Angeles Department of Transportation, Transportation Assessment Guidelines, July 2020.

changes include the elimination of auto delay, Level of Service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts under CEQA.

According to Section 15064.3, subdivision (b)(1):

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

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.3 of the City's VMT Calculator tool. The 2020 LADOT Transportation Analysis Guidelines (TAG) Section 2.2.3 establishes impact criteria for VMT. For projects that do not propose residential uses or a regional serving project (i.e., retail projects, entertainment projects, and/or event centers), the impact criteria would be an exceedance of 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) in which the Project is located. The Project Site is located within the North Valley APC, where a threshold of 15 VMT per employee has been established as the threshold of a significant impact (i.e., 15 VMT is 15 percent below the existing average work VMT per employee for the North Valley APC). Therefore, based on the City's VMT significance thresholds set forth in the TAG for development projects in the North Valley APC, the Project could have a significant impact if the daily work VMT per employee would exceed 15.0.

As discussed in the Project Description, the Project would include several sustainability features, including the following that would encourage alternative travel modes to reduce Project VMT:

- A minimum of ten percent (10 percent) of the new parking spaces as Preferential Parking for HOV carpool, commuter, or vanpool spaces.
- The Project is located in close proximity to public transit located on the southeast corner of Fallbrook and Roscoe.
- A total of 15 short-term and 17 long-term bicycle parking racks/lockers are provided, pursuant to LAMC Section 12.21A.16(a)(1)(i).
- The Project will implement a TDM program in compliance with LAMC Section 12.26 J to reduce and manage employee commute-related trips in private vehicles.

Pursuant to LAMC Section 12.26 J, for projects that exceed 100,000 square feet of gross floor area, the owner shall provide:

- A bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:
 - Current routes and schedules for public transit serving the site.
 - Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations.
 - Ridesharing promotion material supplied by commuter-oriented organizations.
 - Regional/local bicycle route and facility information.
 - A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.
- A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee

demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit.

- One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area.
- Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles.
- No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking.
- A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board.
- A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure.
- Bicycle parking shall be provided in conformance with Section 12.21A16 of the LAMC.
- A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area.
- Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development.
- If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops.
- Safe and convenient access from the external circulation system to bicycle parking facilities onsite.

According to the Project's Transportation Assessment, the City's VMT Calculator indicates that with incorporation of the proposed bicycle parking facilities per City Code (Section 12.21A16), the Project would generate a total of 454 daily vehicle trips and have a Daily Work VMT per Employee of 16.8, which is greater than the applicable North Valley APC significance threshold of 15.0 VMT per Employee. However, the Project would generate a total of 421 daily vehicle trips and have a Daily Work VMT per Employee of 14.5, which is less than the applicable North Valley APC significance threshold of 15.0 with incorporation of the following TDM measures:

- Promotions and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices.
- Implement a ride-share program.

Although the TDM program would be a Project Feature and would be required for compliance with LAMC Section 12.26 J, mitigation measure MM-TRAFF-1: TDM would ensure implementation of TDM components that would reduce VMT to less than significant with mitigation.

In addition to evaluating short-term impacts, as stated in the TAG, projects that fall under the City's efficiency-based impact thresholds align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS that demonstrates regional compliance with air quality conformity requirements and GHG reduction targets. Pursuant to the TAG, project's that are deemed to be consistent with the SCAG RTP/SCS would have a less than significant cumulative impact on VMT. As evaluated in the Transportation

Assessment, the Project's Daily Work VMT per Employee would not exceed the City's efficiency-based impact threshold as proposed, and therefore would be consistent with the RTP/SCS.

Therefore, the Project's potential to conflict with CEQA Section 15064.3 subdivision (b) would be less than significant with mitigation.

Mitigation Measures: No mitigation measures are required.

Mitigation Measure MM-TRAFF-1: Transportation Demand Management (TDM)

At the time of occupancy, owners or tenants of the Project shall implement The following TDM measures shall be implemented by owners or tenants at the time of occupancy:

- Provide marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices.
 - The Project shall utilize promotional and marketing tools that can be accessed by employees such as posters, information boards, or a website to provide information about alternative transportation options and the effects of their travel choices.
- Implement a ride-share program
 - The Project shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for rideshare participants, designing adequate passenger loading/unloading and waiting areas for rideshare vehicles, and providing a website or message board to connect riders and coordinate rides.

c. Less Than Significant Impact. A significant impact could occur if a project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or introduce incompatible uses (e.g., farm equipment) on the Site.

The Project Site has frontage along Fallbrook Avenue, an Avenue II with a posted speed limit of 35 miles per hour, and Roscoe Boulevard, a Boulevard II with a posted speed limit of 40 miles per hour. The Project would be accessed from existing driveways located along the Fallbrook Avenue and Roscoe Boulevard frontages, which currently serve existing uses within the Corporate Pointe West Hills Business Park including the parking lot within the Project Site. The Project would not create new access points along the adjacent roadway frontages. The adjacent roadways, which are relatively straight, provide excellent line of sight for all modes of travel (motorists, pedestrians, and bicyclists) at the Project Site driveways, which are located approximately 300 feet north of the Schoenborn Street intersection and 430 feet south of the Eccles Street intersection (Fallbrook Avenue driveway), and approximately 505 feet west of the Fallbrook Avenue intersection and 625 east of the Lena Avenue intersection (Roscoe Boulevard driveway). Both adjacent roadways feature center left turn lanes which would allow vehicles preparing to turn left into the Project driveways from impeding through traffic lanes.

As determined in the Transportation Assessment, the Project would not result in excessive vehicle queuing at the Project Site driveways, and the driveways will continue to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. Therefore, the potential for the Project to substantially increase hazards due to a geometric design feature or incompatible use would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. A significant impact could occur if a project would result in inadequate emergency access.

The Project would be required to meet the criteria of the City's Fire Code for the provision of adequate fire lanes and turning radii within the Site, and driveway access for emergency vehicles to access the Site. Therefore, the Project's potential impact regarding emergency access would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Less Than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES.

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. No Impact. A significant impact could occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

The PRC, Section 21074,⁷⁴ defines tribal resources as follows:

- (a) “Tribal cultural resources” are either of the following:
- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

⁷⁴ California Legislative Information, website accessed June 25, 2021, at: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21074.

- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

As discussed above in Section V, Cultural Resources, the Project Site is covered by a parking lot and the first 10-12 feet of soil below it consists of fill material. The Phase I Cultural Resource Assessment of the Project Site included a SCCIC and NAHC record search, both of which did not return any positive results. The NAHC record search also indicated the Project was not within an area that is considered sensitive for cultural resources. The City requested an additional record search of the NAHC Sacred Lands File (SLF) for information regarding the Project Site in 2022, which also resulted in a negative findings response letter⁷⁵ (**Appendix H**). As no evidence of known tribal resources have been identified in either the SCCIC or NAHC databases, the potential for the Site to contain or represent a tribal cultural resource would be considered low. Therefore, the Project would not be anticipated to cause a substantial adverse change in the cultural significance of the developed Site, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A project could have a significant impact if it would cause a substantial adverse change in the significance of a tribal cultural resource as defined in the PRC, Section 21074, and that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. As discussed above, an NAHC record search did not produce positive results and it was indicated the Project was not within an area that is considered sensitive for cultural resources. In addition, the Project Site is covered in 10-12 feet of fill and it would be unlikely for substantial excavation to occur below that level. Based upon this the likelihood of a tribal cultural resource on the Project Site is low, as is causing a substantial adverse change if there was an unknown resource onsite.

However, as specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a request in writing to be notified of proposed projects. AB 52 consultation will ensure any tribal group affiliated with the area with knowledge not reflected in the NAHC record request will be provided the opportunity to inform the Project of any potential cultural resources on the Project Site.

The City issued notifications of the project on January 27, 2022 to invite Tribal Groups affiliated with the Project Site vicinity to request consultation. The City received one request for consultation on February 9, 2022 from the Gabrieleno Band of Mission Indians – Kizh Nation. A consultation meeting was scheduled for April 5, 2022. The Tribal Group that requested the consultation canceled the meeting on the day that it was scheduled to occur. As no additional information was provided by the Tribal Group that requested consultation, and no further consultation meetings were scheduled, the City determined that the Tribal Consultation pursuant to the requirements of AB 52 has been completed.

Based on the existing conditions, and compliance with AB 52, the Project would not cause a substantial adverse change in the cultural significance of the infill property or objects with cultural value to a California Native American tribe that the Lead Agency may determine to be significant.

⁷⁵ Native American Heritage Commission, Letter to the City of Los Angeles Department of City Planning Re: 22815-22825 West Roscoe Boulevard Project, Los Angeles County, March 24, 2022.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a. Less Than Significant Impact. A project could have a significant impact if it would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. The Project would construct three new buildings within an existing 77.5 acre (approximately) corporate business park campus which currently contains 10 buildings, all of which are currently served by public utilities infrastructure, and no expansion of utility infrastructure would be required to serve the Project. The Project will require a realignment of an onsite sewer lateral that serves the existing business park campus and passes through the Project Site to a connection with the municipal sewer system near the southeastern boundary of the Project Site. However, this is relatively typical of utility maintenance activities and would not substantially affect operations of the sewer system itself. As the sewer line realignment would occur within the Project Site, which is currently developed with a parking lot, this activity would not cause significant environmental effects. See Section XIX.b for an analysis of water supply and XIX.c for an analysis of wastewater capacity. As infill, the Project would generate a marginal net increase in the demand for electric power, natural gas, and telecommunications facilities relative to existing demand for such services in the City. See Section X, Hydrology and Water Quality for a discussion of potential effects on stormwater drainage infrastructure. As discussed in these evaluations, the Project's

potential to result in significant environmental effects related to relocation or construction of new or expanded utility infrastructure would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less Than Significant Impact. A project could have a significant impact if there were not sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Potable water is supplied to the existing uses on the Project Site and surrounding vicinity by the LADWP. According to the 2015 Urban Water Management Plan (UWMP), the LADWP has sufficient water supplies available for average weather years through the Year 2040, according to population growth estimates with existing passive conservation, as well as for dry and multiple dry years. Water supplies for 2025 for an average weather year are projected by the UWMP to be 644,700 acre-feet per year.⁷⁶

The LADWP is tasked with long-range planning to evaluate future water supply availability and demand to meet the City's needs, including projections for reasonably foreseeable development. The City has adopted several plans, including the Sustainable City pLAN 2019 (LA's Green New Deal), which among other sustainability strategies, include water conservation strategies and targets, including a goal of reducing potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035. All new development projects in the City, including the proposed Project, would be required to be constructed with water conservation fixtures as mandated by the LAGBC. The LAMC Section 99.04.303.4 requires that new development projects demonstrate that a 20 percent reduction in potable water use will be achieved within the building based on maximum allowable water use plumbing fixtures required by the LAGBC. The Project would construct three buildings for warehouse and manufacturing uses within an existing business park campus that is currently served by LADWP. As shown in Section XIV, the estimated number of employees accommodated by the Project would represent less than one tenth of one percent of employment growth projected for the City from 2016 to 2045. The Project does not meet the criteria of a "water demand project" as defined in the CEQA Guidelines Section 15206 and thus a water supply assessment to determine water service feasibility is not required. The Project would be required to pay fees that are collected to support maintenance and expansion of the water system. Therefore, the Project's potential to result in a substantial environmental impact due to insufficient water supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less Than Significant Impact. The Project may have a significant impact if would result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the Project in addition to the provider's existing commitments.

The Los Angeles Bureau of Sanitation (LA Sanitation) provides wastewater conveyance infrastructure and treatment service for the City, including the existing land uses on the Project Site. Wastewater generated from the Project Site is conveyed to the Donald C. Tillman Water Reclamation Plant, and remaining biosolids from the wastewater is then sent to the Hyperion Treatment Plant. Currently, the Hyperion Treatment Plant processes an average wastewater flow rate of nearly 275 million gallons per day (mgd). The plant has the capacity to treat 450 mgd and therefore has excess capacity of approximately 175 mgd.⁷⁷

⁷⁶ LADWP Urban Water Management Plan: 2015, approved June 7, 2016.

⁷⁷ LA Sanitation, Hyperion Water Reclamation Plant, Accessed June 4, 2021, at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1boax5ogxf_880&_afLoop=11856736880830358#

Per LAMC 64.11(3)(b) the City of Los Angeles assesses a Sewer Facilities Charge (SFC) to access the City's sewage system. The fee is based upon a share of equity in the system, tied to individual parcels of land, and based on improvements to each parcel. The SFC is collected by the Bureau of Engineering for the Bureau of Sanitation, which manages the City's sewer system, and is used to pay for sewer infrastructure improvements. The SFC is due when construction and use triggers a net increase in flow and or sewage strength. A sewer assessment is generally not required unless a project is expected to generate at least 10,000 gallons per day (gpd) of sewage. The potential effects of smaller projects on the sewer system are accounted for in the equity share system and the proportional SFC, which is collected at the time of permitting. According to the Sewage Generation Factors Chart from the LA Bureau of Engineering,⁷⁸ based on the square footage for the proposed land uses, the Project would generate approximately 5,453 gpd⁷⁹ of wastewater, which would be less than 1/100th of 1 percent (0.003 percent) of the available capacity of the treatment plant. Therefore, the Project's potential impact regarding wastewater treatment capacity would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less Than Significant Impact. The Project may have a significant impact if would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Solid waste generated within the City is recycled, reused, and transformed at waste-to-energy facilities or disposed of at landfills. Solid waste generated at commercial uses within the City, such as the proposed Project, are collected and transported by private waste collection services. Sunshine Canyon Landfill is the nearest municipal waste landfill within the Los Angeles County that could serve the Project and has an estimated remaining operational period of 18 years.⁸⁰ According to the Countywide Integrated Waste Management Plan 2019 Annual Report, the County projects no shortfalls in disposal capacity through the year 2034 under a status-quo planning scenario utilizing existing landfill facilities without expansions or permitting extensions, and existing waste export agreements. This landfill is currently permitted to receive up to 12,100 tons per day (tpd). Actual daily disposal rates for the year 2019 averaged 6,919 tpd, leaving a surplus daily capacity of 5,181 tpd.⁸¹

Pursuant to the Site's [Q] Qualified Conditions of Approval Environmental Conditions (#31, #32, and #33), the applicant would be required to comply with the following during construction:

31. *The applicant shall implement a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction. (General Construction)*
32. *In order to reduce the deposition of construction materials at solid waste landfills serving the City of Los Angeles, the grading contractor shall identify suitable private sites that accept all fill and earth materials for re-use. Sites in the City currently accepting construction and demolition debris include, but are not limited to California Waste Services, Inc. and Downtown Diversion, Inc. In the event a suitable private site has not been located by the contractor, the contractor shall consult with the Bureau of Engineering to identify an acceptable site, or demonstrate to the satisfaction of the Bureau of Engineering that an acceptable site could not be located. Documentation of which site(s) is used shall be provided to the Bureau of Engineering, prior to the issuance of haul route permits. (General Construction).*

⁷⁸ City of Los Angeles, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, Effective date April 6, 2012.

⁷⁹ Sewerage Generation Factors (gallons per day): warehouse = 30/1,000 square feet; manufacturing = 50/1,000 square feet; office = 120/1,000 square feet.

⁸⁰ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report (September 2020).

⁸¹ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report (September 2020), Appendix E-2, Table 4.

33. *Primary collection bins shall be designed to facilitate mechanized collection of recyclable wastes for transport to on- or off-site recycling facilities.*

During operations, the Project would generate solid waste from tenants occupying the buildings. According to the L.A. CEQA Thresholds Guide, prior to recycling, or other waste diversion programs, a commercial use would generate approximately 10.53 pounds of solid waste per employee per day, and an industrial use would generate approximately 8.93 pounds of solid waste per employee per day.⁸² As shown in Section XIV, the Project could potentially accommodate approximately 211 employees. Conservatively applying the commercial use generation rate, the Project would generate up to approximately 2,222 pound per day of solid waste prior to waste diversion activities.

Diversion of 50 percent of the solid waste stream for recycling would result in a total of 1,111 pounds per day (0.56 tons per day) to be disposed in landfills. As such, the Project's operational solid waste disposal would represent approximately 0.02 percent of the surplus permitted daily capacity of Sunshine Canyon Landfill reported in 2019. However, actual amounts of solid waste generation will likely be lower. Therefore, the Project's potential to have a substantial environmental effect regarding inadequate landfill capacity or attainment of solid waste reduction goals would be less than significant. Pursuant to the Site's [Q] Qualified Conditions of Approval Environmental Condition #40:

40. The applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171,687, specifying recycling space allocation requirements, with regard to all new structures constructed as part of the proposed project.

The Project would be required to comply with City requirements and [Q] Qualified Conditions of Approval Environmental Conditions regarding the diversion of recyclables from the solid waste stream, as described in **Regulatory Compliance Measure RC-UTIL-1** below.

Regulatory Compliance Measure RC-UTIL-1: Utilities (Solid Waste Recycling)

- (Operational) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.
- (Construction/Demolition) Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the Project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety.

Mitigation Measures: No mitigation measures would be required.

e. Less Than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Future tenants of the proposed buildings would be required to obtain a lease from the operator and a business license from the City. Both actions will require disclosure of intended uses, which will determine what other requirements and regulations including waste disposal regulations the business must follow in order to obtain a lease or a business license. Required compliance with all federal, state, and local laws, statutes, and ordinances regarding the proper disposal of solid waste would ensure potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁸² City of Los Angeles, L.A. CEQA Thresholds Guide, 2006. Page M.3-2.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XX. WILDFIRE.

If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factor, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a-d. Less Than Significant Impact. A project could have a substantial impact if the Project Site is located near state responsibility areas or land classified as a VHFHSZ and would substantially impact an adopted emergency plan, exacerbate wildfire risks, or cause impacts through a response to wildfire risk. As mentioned in Section IX, the Project Site is located within a VHFHSZ that extends into the Corporate Pointe West Hills Business Park from open space areas located to the north.⁸³ The Project would build three infill buildings into the southeast corner of the business park that is currently developed as a parking lot and is also the portion of the business park located furthest away from open undeveloped areas. The existing parking lot is located on a relatively level property with no substantial adjacent slopes and is surrounded by irrigated landscaping as well as paved parking lots/roadways and is a minimum of approximately 0.3 miles from existing undeveloped open space. The campus is currently served by firefighting infrastructure including water lines and hydrants. The Project and proposed structures will be required to be constructed to comply with the latest Building Code fire safety requirements including emergency vehicle access, building exits, smoke detectors, sprinklers, emergency lighting etc. The Project Site is also currently served by existing arterial roadways that would not be altered by the Project and could be used for emergency access and/or evacuation as under existing conditions, and therefore the Project would not interfere with any emergency response or evacuation plan. Although wind direction and speed vary by season, the prevailing wind pattern associated with Santa Ana Wind conditions, such as those that occurred during the 2018 Woolsey Fire, typically blow from northeast to the southwest. As such, substantial existing offsite urban development, irrigated landscaping, and roadways located to the north and east of the Site provide

⁸³ City of Los Angeles Fire Department, Fire Zone Map, Accessed on June 2, 2021, at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>.

an even greater distance between the Site and wildlands that would be upwind during a Santa Ana Wind-driven wildfire event. The Project would not require the installation of offsite infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities), and the proposed concrete buildings with surrounding paved parking and irrigated landscaping would not substantially exacerbate wildfire risk. As the previously developed Site is not located on or in an area with substantial slopes or streams, the proposed development of three concrete buildings with associated parking and landscaping would not alter existing drainage patterns or be susceptible to landslide risks that could expose people or structures to significant risks of downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the Project's potential to result in substantial environmental impacts associated with wildfire risks would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Less Than Significant Impact	No Impact
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XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

The Project Site is currently developed with a parking lot and is located within an urbanized area of the City, surrounded by urban uses, including arterial roadways, light industrial uses and parking lots of the larger business park campus, and residential uses to the east and south. The existing parking lot does not represent an important example of a major period of California history or prehistory.

As such, the Project’s potential to substantially degrade the environment, reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory would be less than significant and no additional mitigation measures are required.

b. Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project, in conjunction with other projects in the vicinity, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The Project would

be constructed within an urbanized area of the City, on the previously developed Site, and it would be consistent with existing General Plan land use designations and zoning for the Project Site, with approval of the requested General Plan Amendment, Zone Change, and Height District Change. Additionally, as discussed in Section XIV, the Project would represent less than one percent (0.06 percent) of the projected 2016 to 2045 City employment increase. As such, the scale of the Project would be far below projected growth levels, and it would not be anticipated to result in a cumulatively considerable contribution to regional impacts that could cause an adverse physical change in the environment. As concluded in this analysis, the Project's incremental contribution to each evaluated issue would be less than significant, mitigated to less than significant, or would have no impact. As such, the Project's contribution to cumulative impacts would be less than significant and no additional mitigation measures are required.

c. Less Than Significant Impact. A significant impact could occur if a project has the potential to result in significant environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. As discussed in the preceding environmental analysis, the Project would not have significant environmental effects with implementation of the mitigation measures identified within this document. As such, the Project would not have substantial adverse effects on human beings. Therefore, this potential impact would be less than significant and no additional mitigation measures are required.

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APPENDIX A
CalEEMod Output Sheets

APPENDIX B
Tree Inventory Report

APPENDIX C
Phase I Cultural Resource Assessment

APPENDIX D
Energy Consumption Worksheet

APPENDIX E.1
Geotechnical Report

APPENDIX E.2
LADBS Soils Report Approval Letter

APPENDIX F
Phase I Environmental Site Assessment

APPENDIX G
Transportation Assessment

APPENDIX H
NAHC Letter to the City