



## KPAC Coil Avenue Freezer Expansion Project

Case Number: ENV-2022-6860-ND

**Project Location:** 1420 Coil Avenue, Wilmington, CA 90744

**Community Plan Area:** Wilmington - Harbor

**Council District:** 15—McOsker

**Project Description:** The Project site is located at 1420 Coil Avenue within the Wilmington-Harbor Community Plan area in the City of Los Angeles (City). The Project site encompasses approximately 747,302 square feet (17.16 acres) and includes two zoning designations: [Q] MR2-1 VL-CUGU (Restricted Light Industrial) and [Q] M3-1VL-CUGU (Heavy Industrial). The site's land use designations include Light Manufacturing, Light Industrial, and Heavy Manufacturing. The Project site is currently developed with a one-story (varying heights between 26 to approximately 42 feet) 221,496 square foot cold storage facility used to store wholesale food products for third party users. The facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day, at a quantity of two 8-hour shifts. Additionally, there is an existing double rail spur that includes 9 unloading docks each, equating to 18 unloading stations. Properties surrounding the Project site are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 (Heavy Industrial) to the north and east along Alameda Street, R1-1XL-O-CUGU (One-Family Residential) to the west along Drumm Avenue and [Q]C1-1VL-O-CUGU (Limited Commercial) to the southwest along Pacific Coast Highway.

The proposed Project involves improvement and expansion of the existing cold storage facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet resulting in a net addition of 44,174 square feet of new floor area. The proposed Project would contain a maximum Floor Area Ratio (FAR) of 0.38:1 and would be 65 feet in height (not including rooftop equipment) which exceeds the 45-foot height limit currently allowed per the applicable zoning. Additionally, the existing interior freezer would be remodeled. The improved facility will be expanding to the west and would result in the removal of the existing portion of double rail spur that is located in the path of the expansion. Additionally, the proposed development would include 2,290 square feet designated for the mechanical room expansion, electrical room expansion, and fire pump building and 13,939 square feet of total new second floor building area for the offices. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The expansion would decrease the length of the existing double rail spur and

would also decrease the number of trains unloading stations from 18 down to 6. However, the overall operation of the cold storage facility would remain unchanged following the expansion.

No trees would be removed as part of the expansion. Additionally, the Project includes import of 7,000 cubic yards of earth.

The Applicant is requesting the following entitlements: (1) a General Plan Amendment from Light Industrial land use (45-foot height limit) to Light Industrial land use (site-specific 65-foot height limit), pursuant to LAMC Sec. 11.5.6-B; (2) a change of Height District from 1VL to 1L-D, pursuant to LAMC Sec. 12.32-B; (3) a Zoning Administrators' Determination to permit a Transitional Height of 65 feet in lieu of 61 feet otherwise permitted by LAMC Sec. 12.21.1-A,10 for buildings located 100 feet to 199 feet from lots classified in the R1 Zone, pursuant to LAMC Sec. 12.24-X,22; (4) Site Plan Review for a project adding more than 50,000 square feet of nonresidential floor area; and (5) a waiver of dedication and improvement (WDI) relief from Coil Street and Drumm Avenue.

More specifically, the Applicant is requesting relief from the following requirements:

- Coil Street: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way and roadway width to remain 15 feet as exists.
- Drumm Avenue: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way to remain 20 feet and half roadway width to remain 15 feet as exists.

**PREPARED FOR:  
THE CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING**

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# 1 INTRODUCTION

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

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, which are ultimately required to be adopted by the decision-making body of the City prior to approval of the Project.

## 1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment.

If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency shall adopt a Negative Declaration or a Mitigated Negative Declaration.



## 1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

### 1 INTRODUCTION

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

### 2 EXECUTIVE SUMMARY

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

### 3 PROJECT DESCRIPTION

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

### 4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

## 1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. Throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine whether the Project may have a significant effect on the environment. The analysis contained herein determined that with mitigation, the Project would not have a significant effect on the environment. Therefore, an Initial Study (IS) and Negative Declaration (ND) was determined to be the appropriate CEQA document.

## 2 EXECUTIVE SUMMARY

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<b>PROJECT TITLE</b>	KPAC Coil Avenue Freezer Expansion
ENVIRONMENTAL CASE NO.	ENV-2022-6860-ND
RELATED CASES	CPC-2022-6859-GPA-HD-ZAD-SPR-WDI-

<b>PROJECT LOCATION</b>	<b>1420 Coil Avenue, Wilmington, CA 90744</b>
COMMUNITY PLAN AREA	Wilmington – Harbor City
GENERAL PLAN DESIGNATION	Light Manufacturing, Light Industrial, Heavy Manufacturing
ZONING	[Q]MR2-1VL-CUGU, [Q]M3-1VL-CUGU
COUNCIL DISTRICT	15 - McOsker

<b>LEAD AGENCY</b>	<b>City of Los Angeles</b>
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Norali Martinez
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<b>APPLICANT</b>	Alston Construction Company, Inc.
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## 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"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality                      | <input type="checkbox"/> Hydrology / Water Quality     | <input type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input type="checkbox"/> Land Use / Planning           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities / Service Systems        |
| <input type="checkbox"/> Energy                           | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology / Soils                  | <input type="checkbox"/> Population / Housing          | <input type="checkbox"/> Mandatory Findings of Significance |

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## DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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Norali Martinez, City Planner

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March 17, 2025

PRINTED NAME, TITLE

DATE

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## 3 PROJECT DESCRIPTION

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### 3.1 PROJECT SUMMARY

The Project site is located at 1420 Coil Avenue within the Wilmington-Harbor City Community Plan area in the City of Los Angeles (City). The Project site area encompasses approximately 747,302 square feet (17.16 acres) and includes two zoning designations: [Q] MR2-1 VL-CUGU (Restricted Light Industrial) and [Q] M3-1VL-CUGU (Heavy Industrial). The site's land use designations include Light Manufacturing, Light Industrial, and Heavy Manufacturing. The Project site is currently developed with a one-story (varying heights between 26 to 42 feet) 221,496 square foot warehouse building used to store wholesale food products for third party users. The facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day, at a quantity of two 8-hour shifts. Additionally, there is an existing double rail spur that includes 9 unloading docks each, equating to 18 unloading stations. Properties surrounding the Project site are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 (Heavy Industrial) to the north and east along Alameda Street, R1-1XL-O-CUGU (One-Family Residential) to the west along Drumm Avenue and [Q]C1-1VL-O-CUGU (Limited Commercial) to the southwest along Pacific Coast Highway.

The proposed Project involves improvement and expansion of the existing cold storage facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet resulting in a net addition of 44,174 square feet of new floor area. The new structure would be 65 feet in height (not including rooftop equipment) which exceeds the 45-foot height limit currently allowed per the applicable zoning. Additionally, the existing interior freezer would be remodeled. The improved facility will be expanding to the west and would result in the removal of the existing portion of double rail spur that is located in the path of the expansion. Additionally, the proposed development would include 2,290 square feet designated for the mechanical room expansion, electrical room expansion and fire pump building and 13,939 square feet of total new second floor building area for the offices. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The expansion would decrease the length of the existing double rail spur and would also decrease the number of trains unloading stations from 18 down to 6. However, the overall operation of the cold storage facility would remain unchanged following the expansion.

The Applicant is requesting the following entitlements: (1) a General Plan Amendment from Light Industrial land use (45-foot height limit) to Light Industrial land use (site-specific 65-foot height limit), pursuant to LAMC Sec. 11.5.6-B; (2) a change of Height District from 1VL to 1L-D, pursuant to LAMC Sec. 12.32-B; (3) a Zoning Administrators' Determination to permit a Transitional Height of 65 feet in lieu of 61 feet otherwise permitted by LAMC Sec. 12.21.1-A,10 for buildings located 100 feet to 199 feet from lots classified in the R1 Zone, pursuant to LAMC Sec. 12.24-X,22; (4) Site Plan Review for a project adding more than 50,000 square feet of nonresidential floor area; and (5) a waiver of dedication and improvement (WDI) relief from Coil Street and Drumm Avenue. The dedication required along Coil Street include a 15-foot wide strip of land along the property

frontage between Colon Street and O Street; a partial elbow at the intersection with O Street; and a 15-foot by 15-foot cut corner or 20-foot radius property line return at the intersection with Pacific Coast Highway. Additionally, the improvement requires to construct suitable surfacing to join the existing improvements to provide an 18-foot wide roadway, concrete curb, 2-foot gutter, a 12-foot sidewalk with tree wells, and a partial elbow section with O Street. The dedication required along Drumm Avenue include a 10-foot wide strip of land along the property frontage to complete a 30-foot wide half right-of-way in accordance with Local Street standards; a partial elbow at the intersection with Q Street; and a 15-foot by 15-foot corner or 20-foot radius property line return at the intersection with Pacific Coast Highway. Additionally, the improvement requires to construct suitable surfacing to join the existing improvements to provide a 20-foot wide half roadway, concrete curb, 2-foot gutter, a 10-foot wide concrete sidewalk with tree wells, and the partial elbow section with Q Street.

The Applicant is requesting relief from the following requirements:

- Coil Street: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way and roadway width to remain 15 feet as exists.
- Drumm Avenue: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way to remain 20 feet and half roadway width to remain 15 feet as exists.

## 3.2 ENVIRONMENTAL SETTING

### 3.2.1 Project Location

The Project site is located at 1420 Coil Avenue within the Wilmington – Harbor City Community Plan area (refer to **Figure 1: Project Site Location**) which designates the commercial-zoned portion of the subject property for light manufacturing land uses and zoned [Q] MR2-1 VL-CUGU. The site encompasses approximately 747,302 square feet (approximately 17.16 acres) of lot area. The subject property is bound by the Wilmington Diamond Railroad Crossing to the north, Pacific Coast Highway to the south, Alameda Street to the east and Drumm Avenue to the west.

Properties surrounding the subject property are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 to the north and east along Alameda Street with heavy industrial uses, R1-1XL-O-CUGU to the west along Drumm Avenue with single-family residential uses and [Q]C1-1VL-O-CUGU to the southwest along Pacific Coast Highway with commercial uses.

Ordinance No. 177,243 subjects the following permanent [Q] conditions to subareas 50 and 60 including the Project site:

1. Any open storage uses on the property shall be subject to the following limitations:
  - a. A 15-foot setback shall be required along a Major Highway, or adjacent to or directly across from any residential zone.
  - b. A 5-foot landscaped buffer shall be required along a Class I or II Major Highway or facing any residential zone.

- c. The open storage area shall be enclosed by a solid fence or wall at least 8 feet in height, not to exceed 12 feet. No material or equipment shall be stored to a height exceeding that of the enclosing fence or wall. Such fencing shall be maintained in good condition and appearance. All walls, fences and other structures shall be maintained free of graffiti. Sheet metal and barbed wire shall be prohibited as fencing material along a Class I or II Major Highway, or adjacent to or directly across from any residential zone.
  - d. All driveways and parking spaces shall be paved.
2. No cargo containers may be kept or stored on the site. However, this condition shall not prohibit the loading and/or parking of trucks and truck trailers, including containers on wheels.
  3. An 8-foot masonry wall shall be maintained adjoining any residential property line.
  4. All structures or uses, including open storage, shall maintain a landscaped buffer at least 10 feet wide, including trees and shrubs, designed to visually screen the use, adjoining any residential property line.
  5. No openings shall be permitted on the side of any structure facing a residential zone located within 20 feet of said structure, except for emergency exits as required by Code.

The entirety of the site is located within the Clean Up Green Up District “CUGU” (ZI-2458). The subject property is currently developed with a one-story (varying heights between 26 to approximately 42 feet) 221,496 square foot warehouse building and 9,247 square feet of office space. The Project site complies with CUGU, and does not require either a CUGU Adjustment or a CUGU Exception. The property is in close proximity to an oil well located on the northern portion of the site, as identified in ZIMAS by ZI-1195, which requires a construction site well review (CSWR) be completed by the California Department of Conservation. However, the plugged and abandoned oil well on the property requires no further action at this time. Furthermore, the property is located within ZI-2514 (Trucking Related Use Regulation Ordinance), which provides goals to safeguard the public health, welfare, and safety of the Wilmington and Harbor City communities, which are the most affected by trucking-related activities.

The Project site is located within approximately 2.8 miles of the nearest fault. The Project site does not fall within the Alquist-Priolo Fault Zone, a Preliminary Fault Rupture Study Area, a Flood Zone, Liquefaction Area, Landslide Area, Tsunami Inundation Zone, Hillside Area, or BOE Special Grading Area. Although the Project site is located within a Methane Zone, the Project will be required to comply with any applicable regulatory development measures, as well as those regarding methane hazards. The Project involves associated grading that will result in approximately 7,000 cubic yards of earth being imported to the Project site.

### 3.2.2 Existing Conditions

The entirety of the site is located within the Clean Up Green Up District “CUGU” (ZI-2458). The subject property is currently developed with a one-story (varying heights between 26 to 42 feet) 221,496 square foot warehouse building and 9,247 square feet of office space. The Project site complies with CUGU, specifically related to noise and publicly habitable spaces adjacent to subject uses, and does not require either a CUGU Adjustment or a CUGU Exception. The property is in close proximity to an oil well located on the northern portion of the site, as identified in ZIMAS by ZI-1195, which requires a construction site well review (CSWR) be completed by the California Department of Conservation (refer to **Appendix E.3**). However, the plugged and abandoned oil well on the property requires no further action at this time as the planned construction activities for the proposed project will not directly interact with or affect the integrity of the abandoned well, as the project design avoids any subsurface activities in its vicinity. The property is not located within the boundaries of or subject to any specific plan, community design overlay, or interim control ordinance.

A Phase 1 Environmental Site Assessment (ESA) Report (dated August 26, 2022), prepared by Converse Consultants, revealed evidence of recognized environmental conditions (RECs) and environmental issues in connection with the subject property. More specifically, acceptance of hydrocarbon impacted soil was conducted between 1989 and 1990 resulting in volatile organic compounds (VOC) contaminated soil throughout the Project is a Historical Recognized Environmental Condition (HREC). Bioremediated soils were allowed to be reused at the Project site, based on recommendations provided by the Regional Water Quality Control Board (RWQCB), as long as they are capped with concrete or asphalt.

### 3.2.3 Surrounding Land Uses

Properties surrounding the subject property are zoned M3-1VL to the east with heavy industrial uses, R1-1XL-O-CUGU to the west with single-family residential uses and C1-1VL-O-CUGU to the southwest with commercial uses.

Properties to the north and east across Alameda Street are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 and are designated for heavy manufacturing land uses by the General Plan. The lots to the east are improved with industrial uses along Alameda Street.

Properties to the west across Drumm Avenue are zoned R1-1XL-O-CUGU and is designated for low residential land uses by the General Plan. The lots to the west are improved with single- and multi-family residential uses along Drumm Avenue, E. Sandison Street, E. Cruces Street, E. O Street and E. Colon Street.

Properties to the southwest are zoned 1VL-O-CUGU and are designated for General Commercial land uses by the General Plan. The lots to the southwest are improved with commercial uses along Pacific Coast Highway.



## 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

The Project site is currently developed with a one-story (varying heights between 26 to approximately 42 feet) 221,496 square foot warehouse building used to store wholesale food products for third party users. The facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day. Additionally, there is an existing double rail spur that includes 9 unloading docks each, equating to 18 unloading stations.

The Applicant is proposing to improve and expand the existing 221,496 square foot operations at the 1420 Coil Avenue facility located within the Wilmington neighborhood in the City of Los Angeles (refer to **Figure 2: Site Plan**). The expansion includes demolition and alteration of 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet and 65 feet in height (not including rooftop equipment), resulting in a net addition of approximately 44,174 square feet of new floor area. The new structure would exceed the 45-foot height limit currently allowed per the applicable zoning. Additionally, the existing interior freezer would be remodeled. The improved facility will be expanding to the west and would result in the removal of the existing portion of double rail spur that is located in the path of the expansion. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The expansion would decrease the length of the existing double rail spur and would also decrease the number of trains unloading stations from 18 down to 6. However, the overall operation of the cold storage facility would remain unchanged following the expansion.

In order to facilitate the development of the expansion, the Applicant is requesting the following entitlements: (1) a General Plan Amendment from Light Industrial land use (45-foot height limit) to Light Industrial land use (site-specific 65-foot height limit), pursuant to LAMC Sec. 11.5.6-B; (2) a change of Height District from 1VL to 1L-D, pursuant to LAMC Sec. 12.32-B; (3) a Zoning Administrators' Determination to permit a Transitional Height of 65 feet in lieu of 61 feet otherwise permitted by LAMC Sec. 12.21.1-A,10 for buildings located 100 feet to 199 feet from lots classified in the R1 Zone, pursuant to LAMC Sec. 12.24-X,22; (4) Site Plan Review for a project adding more than 50,000 square feet of nonresidential floor area; and (5) a waiver of dedication and improvement (WDI) relief from Coil Street and Drumm Avenue.

More specifically, the Applicant is requesting relief from the following requirements:

- Coil Street: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way and roadway width to remain 15 feet as exists.
- Drumm Avenue: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way to remain 20 feet and half roadway width to remain 15 feet as exists.

### **3.3.2 Design and Architecture**

The Project site is currently developed with a one-story (varying heights between 26 to 42 feet) 221,496 square foot warehouse building. The proposed Project involves improvement and expansion of the existing warehouse facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet resulting in a net addition of 44,174 square feet of new floor area. The new structure would be 65 feet in height (not including rooftop equipment), which exceeds the 45-foot height limit currently allowed per the applicable zoning. Paved areas, excluding parking and driveway areas, would consist of enhanced paving materials such as stamped concrete and permeable paved surfaces.

### **3.3.3 Open Space and Landscaping**

The Project site currently includes landscaping bordering the east side of the property along Alameda Street. The proposed Project involves improvement and expansion of the existing warehouse facility and would not alter or remove any existing landscaping that currently exists on the site.

### **3.3.4 Access, Circulation, and Parking**

The site currently provides vehicular and pedestrian access through the Coil Avenue security gate on the southwest corner of the property. The main path of access surrounding the facility is by driving along the south and west side of the facility. There are no active vehicle entrances or exits on the west side of the facility. There are two (2) access gates to and from Drumm Avenue, however these gates are restricted for use by only the Los Angeles Fire Department (LAFD). The overall general circulation will remain unchanged following the expansion.

### **3.3.5 Lighting and Signage**

The Project site currently provides ample lighting both externally and internally in order to maintain visibility in and around the structure to prevent any illegal activity within or surrounding the area. All exterior lighting would meet all applicable Los Angeles Municipal Code (LAMC) standards and be shielded or directed toward the areas to be illuminated. The LAMC standards require that all exterior lighting on the Project site would not illuminate adjacent properties.

### **3.3.6 Site Security**

Security is currently at the site 7 days per week for 24 hours per day. Security devices are screened from public view. If metal security grills are used, grills that recess into pockets or overhead cylinders, completely concealed, and retractable would be used. The overall general operation will remain unchanged following the expansion.

### 3.3.7 Special Events

The proposed Project is an expansion of the existing cooler and freezer temperature storage facility. No special events are expected to occur, and the overall general operation will be unchanged following the expansion.

### 3.3.8 Anticipated Construction Schedule

Future dates represent approximations based on the general Project timeline and are subject to change pending unpredictable circumstances that may arise. As such, for purposes of this analysis, Project construction is assumed to begin January 2026 and is expected to last until January 2027. Construction would occur over five (5) phases: (1) demolition; (2) grading; (3) building construction; (4) paving; and (5) architectural coating.

## 3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section [Sec. 11.5.6-B], a General Plan Amendment from Light Industrial land use (45-foot height limit) to Light Industrial land use (site-specific 65-foot height limit).
- Pursuant to LAMC Sec. 12.32-B, a change of Height District from 1VL to 1L-D;
- Pursuant to LAMC Sec. 12.24-X,22, a Zoning Administrator's Determination to permit a Transitional Height of 65 feet in lieu of 61 feet, otherwise permitted for buildings located 100 feet to 199 feet from lots classified in the R1 Zone;
- A Site Plan Review for a project adding more than 50,000 square feet of nonresidential floor area.
- A Waiver of Dedication and Improvements (WDI) relief from Coil Street and Drumm Avenue. More specifically, the Applicant is requesting relief from the following requirements:
  - Coil Street: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way and roadway width to remain 15 feet as exists.
  - Drumm Avenue: All dedications and improvements (with the exception of necessary repairs to existing curbing). Half-street right of way to remain 20 feet and half roadway width to remain 15 feet as exists.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

Figure 1: Project Site Location

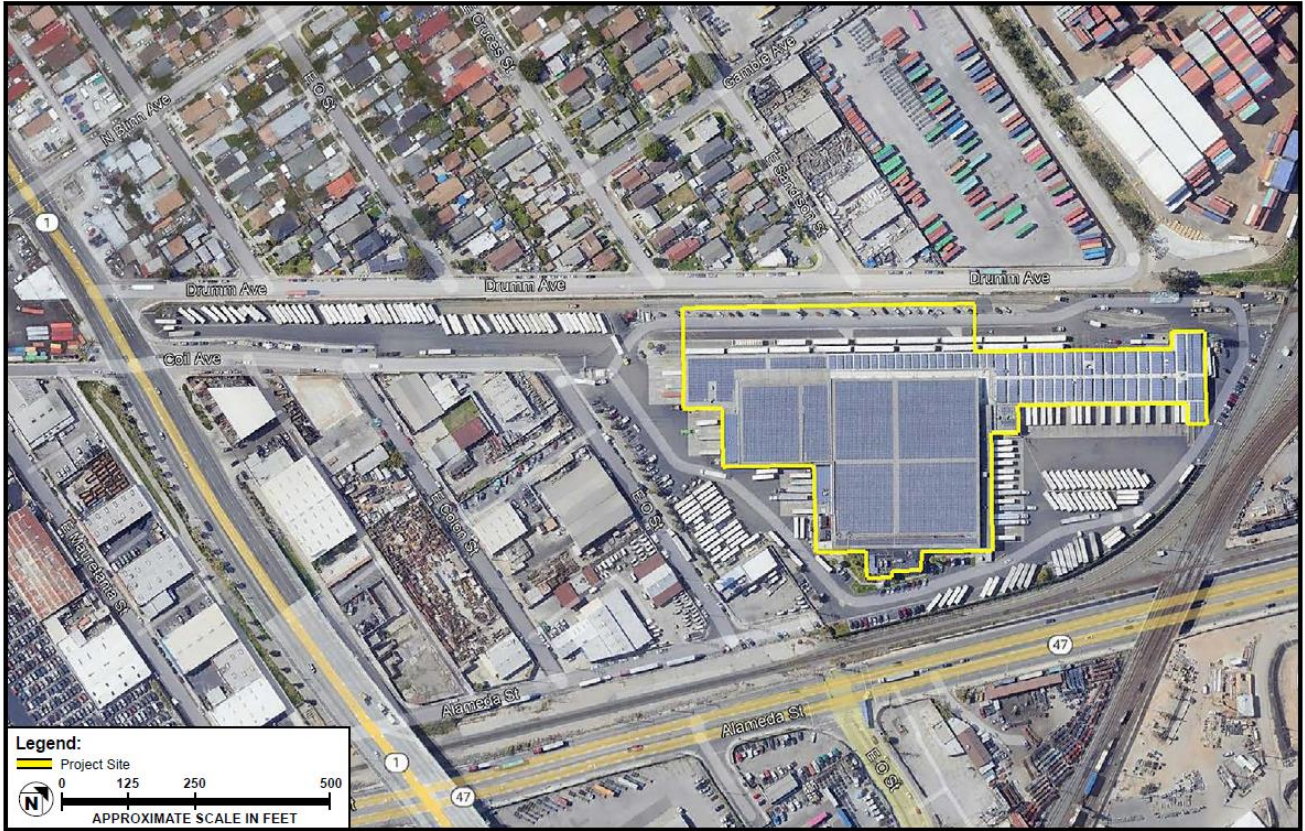


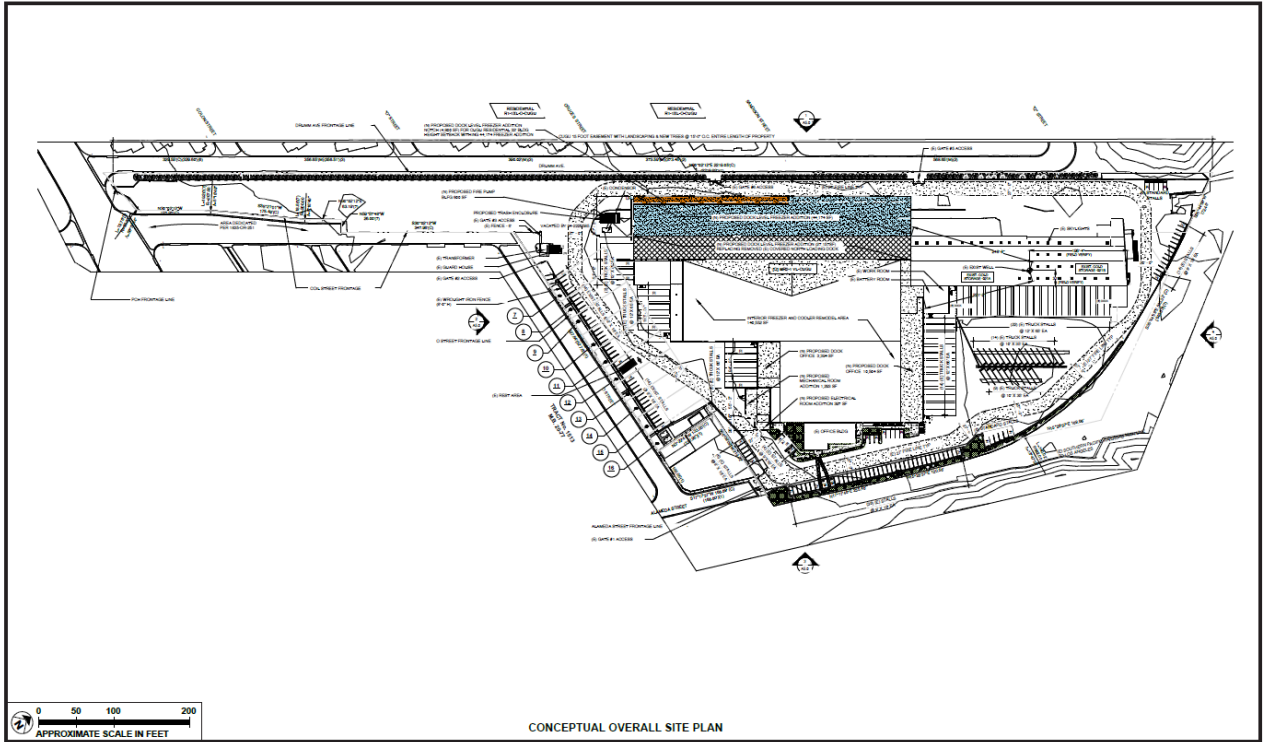
FIGURE 1

**Meridian**  
Consultants

Project Site Location

359-001-22

Figure 2: Site Plan



SOURCE: Kironke-Maust Company - April 2025

FIGURE 2



Site Plan

389-001-22



# 4 ENVIRONMENTAL IMPACT ANALYSIS

## I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Except as provided in Public Resources Code Section 21099 would the project:</i>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

### a. Have a substantial adverse effect on a scenic vista?

**No Impact.** A scenic vista, as defined by the California Department of Transportation (Caltrans), is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A significant impact would occur if the Project would have a substantial adverse effect on a scenic vista. A focal point view would consist of a view of a notable object, building, or setting. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The Project site is within a highly urbanized community in the Wilmington – Harbor City Community Plan Area. The area has a pattern of low density residential (across Drumm Avenue to the west) and industrial uses (along the industrial corridor along Anaheim Street to the east). The existing visual character of the surrounding area is highly urban and the Project site is not located on or near any scenic vistas that would be impeded. Therefore, although the proposed Project would involve an addition resulting in a building height of 65 feet, which increases the

height and development of the Project site which has varying heights between 26 and approximately 42 feet, Project implementation would not obstruct any views of unique scenic vistas or focal points. Development of the proposed Project would result in an incremental intensification of existing prevailing land uses in an already urbanized area in the City. Furthermore, development of the Project and related projects is expected to occur in accordance with adopted plans and regulations. No impact would occur, and no mitigation measures are required.

**b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site. The building has not been identified as requiring Historic Preservation Review. The City of Los Angeles' General Plan Mobility Element (Citywide General Plan Circulation System Maps), as well as Caltrans<sup>1</sup> indicates that no State-designated scenic highways are located near the Project site. Therefore, no impacts related to scenic highways would occur and no mitigation measures are required.

**c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**No Impact.** A significant impact would occur if the proposed Project would substantially degrade the existing visual character or quality of the site and its surroundings. Significant impacts to the visual character of the site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the proposed Project detract from the visual character of an area. The Project will not change the visual character of its surroundings. As mentioned previously, although the proposed Project would involve an addition resulting in a building height of 65 feet, which increases the height and development of the Project site which has varying heights between 26 and approximately 42 feet, Project implementation would not obstruct any views thus not changing the visual character of its surroundings.

The subject property is currently developed with an existing one-story (varying heights between 26 to 42 feet) 221,496 square foot cold storage facility and provides cooler and freezer temperature storage. The proposed Project involves improvement and expansion of the existing warehouse facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet resulting in a net addition of 44,174 square feet of new floor area. The new structure would be 65 feet in

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1 Caltrans. "California State Scenic Highway." Accessed September 2024. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

height (not including rooftop equipment) which exceeds the 45-foot height limit currently allowed per the applicable zoning. Additionally, the existing interior freezer would be remodeled. The improved facility will be expanding to the west and would result in the removal of the existing portion of double rail spur that is located in the path of the expansion. Additionally, the proposed development would include 2,290 square feet designated for the engine, electricity and fire pump building and 13,939 square feet of total new second floor building area for the offices. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The expansion would decrease the length of the existing double rail spur and would also decrease the number of trains unloading stations from 18 down to 6. However, the overall operation of the warehouse building would remain unchanged following the expansion. The existing parking on site, which will not be changed with the Project, is 119 spaces.

The subject property is zoned [Q] MR2-1 VL-CUGU and [Q] M3-1VL-CUGU and is located in a long-established, urbanized neighborhood. Properties surrounding the subject property are zoned M3-1VL to the east along Alameda Street with heavy industrial uses, R1-1XL-O-CUGU to the west along Drumm Avenue with single-family residential uses and C1-1VL-O-CUGU to the southwest along Pacific Coast Highway with commercial uses.

Properties to the north and east across Alameda Street are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 and are designated for heavy manufacturing land uses by the General Plan. The lots to the east are improved with industrial uses along Alameda Street.

Properties to the west across Drumm Avenue are zoned R1-1XL-O-CUGU and is designated for low residential land uses by the General Plan. The lots to the west are improved with single- and multi-family residential uses along Drumm Avenue, E. Sandison Street, E. Cruces Street, E. O Street and E. Colon Street.

Properties to the southwest are zoned [Q]C1-1VL-O-CUGU and are designated for Limited Commercial land uses by the General Plan. The lots to the southwest are improved with commercial uses along Pacific Coast Highway.

Potential for degradation to the visual character and quality of the site and surrounding area would be further reduced with adherence to LAMC Section 91.8104, requires that every building shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material; and LAMC Section 91.8014.15, which requires that the exterior to all building and fences shall be free from graffiti when such graffiti is visible from a street or alley. Aside from the entitlements requested herein, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impacts are anticipated, and no mitigation measures are required.

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

**Less than Significant Impact.** A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. 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. All on-site lighting is directed away from adjacent properties and would not substantially change existing ambient nighttime lighting conditions. No additional lighting would be required due to the facility expansion. The proposed Project does not include any elements or features that would create substantial new sources of glare. Therefore, light and glare impacts would be less than significant.

### **Cumulative Impacts**

The proposed Project is not located on or near any scenic vistas or other important visual resources, including scenic highways. The proposed Project would involve an addition resulting in an increase in building height to 65 feet. However, Project implementation would not obstruct any views of unique scenic vistas. Potential related projects that would increase building heights would result in an incremental intensification in an already urbanized area of the City; however, similar to the proposed Project, all other related projects would not be near scenic vistas and would be developed in accordance with adopted plans and regulations. As such, no cumulative impacts to aesthetics would occur.

## II. AGRICULTURE AND FORESTRY RESOURCES

*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>

**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?**

**No Impact.** A significant impact would occur if the proposed Project would convert valued farmland to non-agricultural uses. The Project site is located in an urbanized area of the City of

Los Angeles. As discussed in **Section 3.0: Project Description**, of this Initial Study, the Project site is currently developed with a warehouse building. In addition, the uses surrounding the Project site primarily include light industrial and single-family residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project site. The Project site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>2</sup> In addition, the proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. As such, no impacts would occur, and no mitigation measures are required.

**b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** A significant impact would occur if the proposed Project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Project site is zoned [Q] MR2-1 VL-CUGU and is designated for Restricted Light Industrial land uses by the Wilmington – Harbor City Community Plan. The Project site is not zoned for agricultural use, nor is there farmland at the site. In addition, none of the surrounding properties are zoned or utilized for agricultural use. Furthermore, the Project site and surrounding area are not enrolled under a Williamson Act Contract.<sup>3</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. As such, no impacts would occur, and no mitigation measures are required.

**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))?**

**No Impact.** A significant impact would occur if the proposed Project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project site is located in an urbanized area and is currently developed with a warehouse building. The Project site does not include any forest land or timberland. In addition, the Project site is currently zoned for industrial uses and is not zoned and/or used as forest land.<sup>4</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no mitigation measures are required.

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<sup>2</sup> California Department of Conservation. “Los Angeles County Important Farmland.” Farmland Mapping and Monitoring Program. Accessed September 2024. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>.

<sup>3</sup> California Department of Conservation. “Williamson Act Contract Land.” Division of Land Resource Protection. Accessed September 2024. [https://www.conservation.ca.gov/dlrp/wa/Pages/stats\\_reports.aspx](https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx).

<sup>4</sup> US Forest Service. “Map of the Angeles National Forest.” Angeles National Forest. Accessed September 2024. <https://www.fs.usda.gov/detailfull/angeles/maps-pubs/?cid=FSEPRD535505>.

**d. Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** A significant impact would occur if the proposed Project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required.

**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?**

**No Impact.** A significant impact would occur if the proposed Project caused the conversion of farmland to non-agricultural use. The Project site is located in a highly developed area and zoned for light industrial uses within the Wilmington-Harbor Community Plan. The subject property is currently improved with an existing warehouse building and is located in an urbanized area of the City, and no agricultural uses, designated Farmland, or forest land uses occur at the Project site or within the surrounding area. As such, the Project would not result in the conversion of farmland to nonagricultural use. No impacts would occur, and no mitigation measures are required.

**Cumulative Impacts**

The Project site is in an urbanized area that is not near or on land used for or designated as agricultural or forestland. Therefore, no cumulative impacts related to agriculture and forestry resources would occur.

### III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>

The following section summarizes and incorporates by reference information from the *Air Quality Study* prepared by Meridian Consultants, dated September 2024, on behalf of the Applicant. The Air Quality Study is included as **Appendix A** of this ND.

#### a. Conflict with or obstruct implementation of the applicable air quality plan?

**Less than Significant Impact.** The South Coast Air Basin (Basin) is designated nonattainment at the federal and State level for ozone and PM2.5. SCAQMD has developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin.

#### Construction

All construction activities would be conducted in compliance with the SCAQMD rules pertaining to Fugitive Dust (Rule 403)<sup>5</sup> and Architectural Coating (Rule 1113),<sup>6</sup> and heavy-duty diesel

<sup>5</sup> South Coast Air Quality Management District (SCAQMD). *Fugitive Dust Rule 403*. Accessed September 2024. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>6</sup> SCAQMD. *Architectural Coatings (Rule 1113)*. Accessed September 2024. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

equipment would meet minimum California Air Resources Board (CARB) off-road fleet requirements.

Construction impacts include emissions associated with demolition, grading, construction of freezer expansion, paving, and architectural coating. Construction emissions result from on- and off-site activities. On-site emissions principally consist of exhaust emissions from the activity levels of heavy-duty construction equipment, motor vehicle operation, and fugitive dust (mainly PM10) from disturbed soil. Additionally, paving operations and application of architectural coatings would release reactive organic gas (ROG) emissions. Off-site emissions are caused by motor vehicle exhaust from delivery vehicles, worker traffic, and road dust (PM10 and PM2.5).

The analysis of daily construction emissions was prepared utilizing CalEEMod (version 2022.1.1.26) recommended by SCAQMD. **Table 4.3-1: Unmitigated Maximum Regional Construction Emissions** presents the maximum estimated daily emissions anticipated to occur throughout the duration of Project construction. Emissions of volatile organic compounds (VOC), nitrogen oxides (NOx), carbon monoxide (CO), sulfur oxides (SOx), and particulate matter (PM10 and PM2.5) are compared against the applicable SCAQMD mass daily thresholds of significance. As shown in **Table 4.3-1**, maximum daily emissions during construction would be below the applicable SCAQMD maximum daily emission thresholds. Accordingly, air quality emissions associated with construction of the Project would have a less than significant effect on the environment.

**TABLE 4.3-1: UNMITIGATED MAXIMUM REGIONAL CONSTRUCTION EMISSIONS**

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Maximum	41.5	25.3	19.3	0.1	5.4	2.3
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

*Notes: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.*

Source: Refer to **Appendix A**.

### **Operation**

Operational emissions would result primarily from passenger vehicles traveling to and from the Project site. As mentioned previously, the facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day, at a quantity of two 8-hour shifts per day. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The new expanded facility would add approximately a maximum of 30 employees resulting in a total of 180 employees. Approximately 80 percent (144 employees) will work the day shift and approximately 20 percent (36 employees) will work the night shift. Similar to existing conditions, approximately 30 percent of the employees will continue to carpool

or use public transportation. Therefore, approximately 126 cars will arrive and depart from the facility per day. The expansion would result in an addition of approximately 40 trucks/containers arriving and departing the Project site per day, resulting in a total of 160 trucks/containers per day. Truck activity would continue to be conducted by appointment only, therefore no trucks would be idling off-site. Truck trips converted to PCE units at a ratio of 1.5 passenger cars results in 480 trips. As such, the proposed expansion would result in 732 daily trips.<sup>7</sup>

The results presented in **Table 4.3-2: Unmitigated Maximum Regional Operational Emissions** are compared to the SCAQMD-established operational significance thresholds. As shown, the operational emissions would not exceed the regional VOC, NOx, CO, SOx, PM10, and PM2.5 concentration thresholds. Accordingly, air quality emissions associated with operation of the Project would have a less than significant effect on the environment.

**TABLE 4.3-2: UNMITIGATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS**

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Mobile	1.4	12.3	18.6	0.1	5.8	1.6
Area	8.8	0.1	12.3	<0.1	<0.1	<0.1
Energy	0.1	1.6	1.3	<0.1	0.1	0.1
<b>Total</b>	<b>10.2</b>	<b>14.0</b>	<b>32.2</b>	<b>0.1</b>	<b>5.9</b>	<b>1.7</b>
<i>SCAQMD Mass Daily Threshold</i>	55	55	550	150	150	55
<b>Threshold exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

*Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations. CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.*

Source: Refer to **Appendix A**.

**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?**

**Less than Significant Impact.** SCAQMD recommends that a project be considered to result in a cumulatively considerable impact to air quality if any construction-related emissions and operational emissions from individual development projects exceed the mass daily emissions thresholds for individual projects.<sup>8</sup> As discussed previously, Project construction and operation emissions were estimated using California Emissions Estimator Model (CalEEMod), a Statewide land use emissions computer model designed to quantify potential criteria pollutant and

<sup>7</sup> 126 employees arriving trips + 126 employees departing trips + 480 PCE trips = 732 daily trips

<sup>8</sup> SCAQMD. "White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions." Board Meeting. Agenda No. 29 (September 5, 2003). Appendix D, p. D-3.

greenhouse gas (GHG) emissions associated with both construction and operations from land use projects. As shown in **Table 4.3-1**, maximum daily construction emissions for the Project would not exceed the SCAQMD thresholds for the criteria pollutants VOC, NOx, CO, SOx, PM10, and PM2.5. As shown in **Table 4.3-2**, maximum daily operational emissions for the Project would not exceed the SCAQMD thresholds for the criteria pollutants VOC, NOx, CO, SOx, PM10, and PM2.5. Therefore, the Project would result in a less-than-significant impact related to cumulative construction and operational emissions.

**c. Expose sensitive receptors to substantial pollutant concentrations?**

**Less than Significant Impact.** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.

**Localized Significant Emission Concentrations**

The SCAQMD *Final Localized Significance Threshold [LST] Methodology*<sup>9</sup> provides guidance on analysis of localized air quality impacts. Maximum daily LST values were derived for emissions of NOx, CO, PM10, and PM2.5 that would be generated during construction and operation of the Project. The results of the LST analysis are provided in **Table 4.3-3: Localized Construction and Operational Emissions**. These estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. Construction would comply with SCAQMD’s Rule 403 (Fugitive Dust), which requires watering of the site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing track-out dust from construction vehicles. As shown in **Table 4.3-3**, emissions would not exceed the localized significance construction and operational thresholds. As such, impacts would be less than significant.

**TABLE 4.3-3: LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS**

Source	NOx	CO	PM10	PM2.5
	On-Site Emissions (pounds/day)			
Total maximum construction emissions	12.9	14.6	2.4	1.4
LST construction threshold	74	757	6	4
<b>Construction Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Project area/energy operational emissions	1.7	12.6	0.1	0.1

9 SCAQMD. *Final Localized Significance Threshold Methodology*. (2008). p. 3-3. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>.



**TABLE 4.3-3: LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS**

Source	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	On-Site Emissions (pounds/day)			
LST operational threshold	74	757	4	1
<b>Operational Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations. CO = carbon monoxide; NO<sub>x</sub> = nitrogen oxide; PM<sub>10</sub> = particulate matter less than 10 microns; PM<sub>2.5</sub> = particulate matter less than 2.5 microns.

Source: Refer to **Appendix A**.

**Toxic Air Contaminants**

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. As mentioned previously, commercial hotel and multi-family residential uses are located adjacent to the Project site. Localized diesel particulate emissions (strongly correlated with PM<sub>2.5</sub> emissions) would be minimal and would be substantially below localized thresholds, as shown in **Table 4.3-3**. Project compliance with the CARB anti-idling measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project site. Based on the uses expected on the Project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance.

**d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less than Significant Impact.** As shown in **Table 4.3-3**, the construction and operation of the Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the number of VOCs in architectural coatings and solvents. According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more

likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed uses.

Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan.

### **Cumulative Impacts**

Air quality emissions during the construction and operation of the proposed Project would have a less than significant effect on the environment. Furthermore, the proposed Project's maximum daily construction and operational emissions would not exceed the SCAQMD thresholds for criteria pollutants. Thus, the proposed Project would result in a less than significant impact related to cumulative construction and operational emissions. It is largely speculative at this time to determine whether the proposed Project would overlap with any future projects. However, all projects, including the proposed Project, would be subject to SCAQMD rules and regulations to limit fugitive dust and other emissions. Therefore, the proposed Project's contribution to cumulative air quality impacts would be less than significant.

## IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US 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 type="checkbox"/>	<input checked="" 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"/>

The following section summarizes and incorporates by reference information from the Arborist Report prepared by The Tree Resource dated August 26, 2022, on behalf of the Applicant. The Arborist Report is included as **Appendix B** of this ND.

**a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**No Impact.** A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. The Project site is located in an urbanized area and is currently developed with an existing warehouse building. Due to the urbanized and disturbed nature of the Project site and the surrounding developed areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Areas not used for buildings, driveways, parking, or pedestrian amenities include landscaping in the form of non-native/non-protected trees and grass.

Due to the lack of habitat on the Project site, special status species listed by the California Department of Fish and Wildlife<sup>10</sup> or by the US Fish and Wildlife Service<sup>11</sup> would not be anticipated to be present on-site. Furthermore, the Project site is not located in or adjacent to a Biological Resource Area as defined by the City.<sup>12</sup> As detailed in **Appendix B**, there are no protected trees or shrubs on the site that would be considered protected native within the City of Los Angeles Native Tree Protection Ordinance. Additionally, there are no street trees in the parkway perimeter of the Project site. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, US Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code. Therefore, the Project would not have any 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 US Fish and Wildlife Service. No impacts would occur and no mitigation measures are required.

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

**No Impact.** A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The Project site is located in an urbanized area and is currently developed with an existing warehouse building. No riparian or other sensitive

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<sup>10</sup> California Department of Fish and Wildlife. "California Natural Diversity Database." Special Animals List. Accessed September 2024.

<sup>11</sup> US Fish and Wildlife Service. "Listed species believed to or known to occur in California." ECOS Environmental Conservation Online System. Accessed September 2024. <https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed>.

<sup>12</sup> City of Los Angeles Department of City Planning. "Los Angeles Citywide General Plan Framework." Draft Environmental Impact Report. January 19, 1995. P. 2-18-4.

natural community exists on the Project site.<sup>13,14</sup> The Project site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>15,16</sup> There are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the US Fish and Wildlife Service.<sup>17,18,19</sup> Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required.

**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?**

**No Impact.** A significant impact would occur if federally protected wetlands would be modified or removed by a project. The Project site is located in an urbanized area and is currently developed with an existing warehouse building. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project site.<sup>20</sup> As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required.

**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?**

**No Impact.** A significant impact would occur if the proposed Project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. No surface water bodies, streams or waterways occur on the Project site. The Project site does not provide nursery sites for wildlife, nor is it conducive to function as a corridor for migratory wildlife. Street trees would be planted in the public right of way and adjacent to the surface parking. The MBTA implements the US' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. Nesting migratory birds are protected under the MBTA (US Code, Title 16, Sections 703–712) and California Fish and Game Code Sections

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<sup>13</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

<sup>14</sup> US Environmental Protection Agency. NEPAassist. Accessed September 2024. [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist).

<sup>15</sup> City of Los Angeles Department of City Planning. "Los Angeles Citywide General Plan Framework." Draft Environmental Impact Report. January 19, 1995. P. 2-18-4.

<sup>16</sup> Los Angeles County. "Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map." Los Angeles County General Plan. October 6, 2015. Updated September 2021. Accessed September 2024. <https://planning.lacounty.gov/long-range-planning/general-plan/>.

<sup>17</sup> California Department of Fish and Wildlife. Biographic Information and Observation System (BIOS). Accessed September 2024. [www.wildlife.ca.gov/Data/BIOS](http://www.wildlife.ca.gov/Data/BIOS).

<sup>18</sup> California Department of Fish and Wildlife. CDFW Lands. Accessed September 2024. <https://www.wildlife.ca.gov/Lands>.

<sup>19</sup> California Department of Fish and Wildlife. National Wetlands Inventory. Accessed September 2024. <https://www.fws.gov/program/national-wetlands-inventory>.

<sup>20</sup> US Environmental Protection Agency. NEPAassist. Accessed September 2024. [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist).

3503 et seq. Compliance with federal MBTA and California Fish and Game Code would reduce the impact to a less than significant level. Therefore, the Project would not interfere with the movement of any native resident or migratory species or impede the use of native wildlife nursery sites. No impact would occur, and no mitigation measures are required.

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

**No Impact.** A significant impact would occur if the proposed Project would be inconsistent with local regulations pertaining to biological resources. The City Protected Tree Ordinance (No. 186,873) requires the protection Southern California native tree species such as oak trees, Southern California black walnut, western sycamore, and California bay trees and protected shrubs such as Mexican Elderberry and Toron. As detailed in **Appendix B**, there are no protected trees or shrubs on the site that would be considered protected native within the City of Los Angeles Native Tree Protection Ordinance. Additionally, there are no street trees in the parkway perimeter of the Project site. The proposed Project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CFGC protect migratory birds that may use trees on or adjacent to the Project site for nesting, and may be disturbed during construction of the proposed Project. As mentioned previously, no protected trees are currently onsite.<sup>21</sup> Therefore, there would be no impact relating to conflicts with local policies and ordinances protecting biological resources. No impacts would occur, and no mitigation measures are required.

**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?**

**No Impact.** The Project site is located in an urbanized area and is currently developed with an existing warehouse building. As described previously, the Project site does not support any habitat or natural community.<sup>22,23</sup> No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project site.<sup>24</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required.

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<sup>21</sup> See **Appendix B**.

<sup>22</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

<sup>23</sup> US Environmental Protection Agency. NEPAassist. Accessed September 2024. [www.epa.gov/nepa/nepassist](http://www.epa.gov/nepa/nepassist).

<sup>24</sup> California Department of Fish and Wildlife. California Regional Conservation Plans. October 2017.

## **Cumulative Impacts**

Similar to the proposed Project, future related projects would be located in highly urbanized and developed areas that most likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. The proposed Project would not result in any significant impacts on biological resources. Therefore, cumulative impacts related to biological resources would be less than significant.

## V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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"/>

The following section summarizes and incorporates by reference information from the AB52 Consultation conducted by the City and the California Historical Resources Information System (CHRIS) prepared by PaleoWest, dated August 29, 2023, on behalf of the Applicant. The AB52 Consultation and CHRIS report is included as **Appendix C** of this ND.

**a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?**

**No Impact.** A significant impact would occur if the proposed Project would substantially alter the environmental context of or remove identified historical resources. Section 15064.5 defines historic resources as resources listed or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources, resources included in a local register of historical resources or identified as significant in an historical resources survey meeting the requirements of PRC section 5024.1(g), and other resources considered to be historical resources by the lead agency based on substantial evidence. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project site is currently developed with an existing warehouse building used to store wholesale food products for third party users. Additionally, the building has not been identified as a historic resource by local or State agencies, and the Project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical



Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register. There are no identified historical resources on site according to Los Angeles Historic Resources Inventory<sup>25</sup> (OHR 2019) and SurveyLA for Wilmington-Harbor City.<sup>26</sup> Additionally, a California Historical Resources Information System (CHRIS) record search was conducted on August 15, 2023 (refer to **Appendix C.2**). No previously documented cultural resources lie within or immediately adjacent to the Project area nor are they listed on the Built Environment Resources Directory (BERD). Moreover, the City of Los Angeles Office of Historic Resources concluded that the Project site is not a historical resource for purposes of CEQA. No impacts would occur, and no mitigation measures are required.

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

**Less than Significant Impact.** A significant impact would 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 significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. No excavation activities are proposed as the Project would include 7,000 cubic yards of soil to be imported during the grading phase. Although no excavation activities are anticipated, in the event that any subsurface cultural resources are encountered at the Project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. The Project would not cause a substantial adverse change in the significance of an archaeological resource. With the

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<sup>25</sup> City of Los Angeles Office of Historic Resources (OHR). “HistoricPlacesLA.” Los Angeles Historic Resources Inventory Map. Accessed September 2024. <http://www.historicplacesla.org/map>.

<sup>26</sup> City of Los Angeles SurveyLA Results: Wilmington – Harbor City. Accessed September 2024. <https://planning.lacity.gov/preservation-design/survey-la-results-wilmington-harbor-city>.

implementation of regulatory requirements, impacts to archaeological resources would be less than significant, and no mitigation measures are required.

**c. Disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less than Significant Impact.** A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project site. As discussed previously, the Project site is located within an urbanized area and has been subject to previous grading and development. No excavation activities are proposed as the Project would include 7,000 cubic yards of soil to be imported during the grading phase; thus the finding of human remains would be minimal. While no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur within the Project area, there is always a possibility that human remains can be encountered during construction. In addition, In the event that human skeletal remains are encountered at the Project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground 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 human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

- 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 will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
    - The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
    - If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
    - The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
    - If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Therefore, impacts related to human remains would be less than significant, and no mitigation measures are required.

## **Cumulative Impacts**

The individual Project-level impacts associated with cultural resources were found to be less than significant and no mitigation would be required. The proposed Project would be required by law to comply with all applicable federal, State and local requirements related to historical, cultural and archaeological resources. Similar to the proposed Project, any future related projects would also be required to comply with all such requirements and regulations, to be consistent with the provisions set forth by CEQA and the CEQA Guidelines, including the implementation of all feasible mitigation measures, should a significant Project-related and/or cumulative impact be identified. As such, cumulative impacts would be less than significant.

## VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>

This section analyzes the Project’s potential impacts on energy resources, focusing on electricity and transportation-related energy (petroleum-based fuels). This analysis addresses both construction and operational impacts associated with the consumption of energy resources. This section evaluates the demand for energy resources attributable to the Project and determines whether the current and planned electrical and petroleum-based fuel supplies and distribution systems are adequate to meet the Project’s forecasted energy consumption. The information presented herein is based, in part, on the California Emissions Estimator Model (CalEEMod) outputs as calculated for **Section III: Air Quality** and **Section VIII: Greenhouse Gas Emissions**, and on the calculations for this section as presented in **Appendix D: Energy Calculations**.

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

**Less than Significant Impact.** A significant impact would occur if the project would substantially increase demand for energy resources, which exceeds the available supply. The Project would be constructed in accordance with all applicable laws and regulations, including applicable State and federal laws, and building regulations pursuant to the LAMC and Los Angeles Green Building Code (LA Green Building Code) that are intended to promote efficient utilization of resources and minimize environmental impacts.

**Construction**

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Construction of the proposed Project would require the use of various forms of energy. **Table 4.6-1: Summary of Energy Use During Construction** summarizes the quantity of petroleum fuels and electricity that would be consumed during construction. As shown in **Table 4.6-1**, 46,651 gallons of diesel fuel, 4,445 gallons of gasoline fuel, and 1,763 kilowatt-hours (kWh) of electricity would be consumed during construction. When compared to the national oil supply in 2023 of 17.7 million barrels per day,<sup>27</sup> and the City’s estimated power demand of 22,452 gigawatt-hours,<sup>28</sup> the oil and electricity usage during construction would be minimal. Moreover, the Project site is currently developed with a solar panel system located on-site which has a 1.5 MWh capacity.

Although construction would consume energy resources, construction activities would be temporary and would cease at the end of construction; therefore, there would be no long-term energy impacts associated with construction activities. The adopted energy conservation plans do not specifically discuss energy uses from construction activities. For this reason, and because the amount of fuel and electricity used during construction would be minimal and met by existing sources, impacts from construction would be less than significant.

**TABLE 4.6-1: SUMMARY OF ENERGY USE DURING CONSTRUCTION**

Fuel Type	Quantity
<b>Diesel</b>	
Off-Road Construction Equipment	34,846 Gallons
On-Road Motor Vehicles	11,805 Gallons
Total	46,651 Gallons
<b>Gasoline</b>	
Off-Road Construction Equipment	0 Gallons
On-Site Motor Vehicles	4,445 Gallons
Total	4,445 Gallons
<b>Electricity</b>	<b>1,763 kWh</b>

*Note: Refer to **Appendix D** for Energy Calculations.*

**Operation**

During operation, energy would be consumed for a variety of purposes, including electricity consumption for lighting, appliances, heating, ventilation, and air conditioning (HVAC) equipment,

<sup>27</sup> US Energy Information Administration. “Annual Energy Outlook 2020: Table 11.” Petroleum and Other Liquids Supply and Disposition. Accessed September 2024. <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0>.

<sup>28</sup> City of Los Angeles Department of Water and Power. 2018 Retail Electric Sales and Demand Forecast. November 2018. Accessed September 2024. [https://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast\\_Final.pdf](https://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf).

water supply and delivery, and other commercial operations that include transportation fuel consumption from motor vehicles driving to and from the site.

The Project would implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use. The Project would comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria. The Project would also comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

An energy report for the Project site shows that the existing uses generated approximately 1,524 megawatt-hours (MWh) in 2021.<sup>29</sup> Electricity demand would decrease to approximately 1,433 MWh once the Project is built out.<sup>30</sup> This decrease is the result of higher energy efficiency standards such as Title 24. Electricity demand at the Project site would be met by the existing solar panel system located on-site which has a 1.5 MWh capacity.

In addition to decreasing electricity consumption, the Project would be designed and operated in accordance with the applicable State Building Code Title 24 regulations and the LA Green Building code, which impose energy conservation measures. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy efficiency. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also be in compliance with the LA Green Building Code.

Trip generation estimates for the Project were calculated based on results from the City of Los Angeles VMT calculator (refer to **Appendix G.1**). As shown, the Project would result in a net daily increase of 1,092 VMT. This would result in a daily increase in consumption of approximately 26 gallons of vehicle fuel.<sup>31</sup> When compared to the national crude oil supply in 2026 of 17.9 million barrels per day,<sup>32</sup> the crude oil usage during operation would be minimal.

As such, impacts related to energy consumption would be less than significant and no mitigation measures are required.

**b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less than Significant Impact.** State plans adopted for the purposes of promoting energy efficiency include the California Renewable Portfolio Standard, the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350), the CARB's "In-Use Off-Road Diesel Fueled Fleets

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<sup>29</sup> See **Appendix D** for energy report.

<sup>30</sup> See **Appendix D** for energy calculations.

<sup>31</sup> See **Appendix D** for energy calculations.

<sup>32</sup> US Energy Information Administration. "Annual Energy Outlook 2020: Table 11." Petroleum and Other Liquids Supply and Disposition. Accessed September 2024. <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0>.

Regulation” and “Advanced Clean Cars Program,” California Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, CCR Part 6), and the California Green Building Standards Code (CALGreen, CCR Part 11).

Local plans adopted for the purposes of promoting energy efficiency include the City of Los Angeles Sustainable City Plan, the LAGBC, the LADWP 2017 Power Strategic Long-Term Resource Plan. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

The current Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards. The Project would be constructed in accordance with all applicable laws and regulations, including State and federal laws, and building regulations pursuant to the LAMC and LA Green Building Code that are intended to promote efficient utilization of resources and minimize environmental impacts. Thus, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant and no mitigation measures are required.

### **Cumulative Impacts**

The proposed Project would be constructed in accordance with all applicable laws and regulations, including applicable State and federal laws, and building regulations pursuant to the LAMC and the LA Green Building Code. The proposed Project’s impacts related to energy consumption during construction and operation would be less than significant. Future related projects would also be subject to applicable regulations, would not conflict with or obstruct State or local plans for renewable energy or energy efficiency. Thus, cumulative impacts resulting from the proposed Project would be less than significant.

## VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a. Directly or indirectly cause 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 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 waste water disposal systems where sewers are not available for the disposal of waste water?	<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 geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



- 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.**

**Less than Significant Impact.** A significant impact would occur if the proposed Project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the Project site and if the Project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

The Project site is not within a currently established Alquist-Priolo Earthquake Fault Zone.<sup>33</sup> In addition, according to the CGS, the Project site is not located in an Earthquake Fault Zone.<sup>34</sup> The nearest fault is the Newport – Inglewood Fault Zone, approximately 2.8 miles from the Project site. Therefore, since no known faults are directly beneath the Project site, the Project would not exacerbate existing environmental conditions such that rupture of a known earthquake fault would occur because of the Project. The Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust.

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<sup>33</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

<sup>34</sup> California Department of Conservation. Earthquake Zones of Required Investigation. Accessed September 2024. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions and impacts would be less than significant, and no mitigation measures are required.

## **ii. Strong seismic ground shaking?**

**Less than Significant Impact.** A significant impact would occur if the proposed Project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The Project site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake. However, as stated in the previous discussion, no active faults are known to pass directly beneath the Project site and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking.

Although the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to strong seismic ground shaking, the following discussion about seismic building codes is provided for informational purposes only. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. As with other development projects in the City, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the latest California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to lessen the effect of losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project would therefore be required to comply with the plan check review and permitting requirements of the Los Angeles Department of Building and Safety, including the incorporation of the recommendations provided in a final, site-specific geotechnical report. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Seismic Safety Act and Seismic Hazards Mapping Act.

Furthermore, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions like strong seismic ground shaking. Based on this, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Impacts would be less than significant, and no mitigation measures are required.

## **iii. Seismic-related ground failure, including liquefaction?**

**Less than Significant Impact.** A significant impact may occur if a proposed Project site is located within a liquefaction zone. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking.

Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion.

The City of Los Angeles does not classify the Project site as part of a potentially liquefiable area<sup>35</sup> or as a liquefaction zone as classified by the State of California.<sup>36</sup> The Seismic Hazards Map of the State of California does not classify the Project site as within a liquefiable area.

Development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking.<sup>37</sup> Additionally, the Project does not include any excavation activities during construction. Thus, not all three conditions are met (i.e., shallow groundwater, sandy soils, and strong ground motion) that could cause liquefaction. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required.

#### **iv. Landslides?**

**No Impact.** A significant impact would occur if the proposed Project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project site and surrounding area are fully developed and generally characterized by flat topography. There is no elevation difference across the Project site.<sup>38</sup>

The Project site is not located within a City Hillside Grading Area or a Hillside Ordinance Area, or a landslide area, as mapped by the City.<sup>39</sup> In addition, the Project would not substantially alter the existing topography of the Project site. Specifically, the Project does not propose creating any steep slopes, and, as such, the Project site would remain flat.

Therefore, the Project would not exacerbate existing conditions that would result in landslides. Accordingly, no impact would occur and no mitigation measures are required.

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<sup>35</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

<sup>36</sup> California Department of Conservation. Earthquake Zones of Required Investigation. Accessed September 2024. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

<sup>37</sup> California Department of Conservation. Earthquake Zones of Required Investigation. Accessed September 2024. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

<sup>38</sup> California Department of Conservation. Earthquake Zones of Required Investigation. Accessed September 2024. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

<sup>39</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

**b. Result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Construction of the proposed Project would result in ground surface disturbance of the Project site. The site is currently developed with an existing warehouse building and associated parking. As such, there are no open spaces with exposed topsoil. Additionally, no excavation activities are expected to occur during construction.

Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed by the City through grading and building permit regulations. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

The Project would be required to comply with the City's Low Impact Development (LID) Ordinance and implement best management practices (BMPs), as well as standard erosion controls to limit stormwater runoff, which can contribute to erosion. Additionally, proper grading practices during construction must be adhered to in accordance with City regulations. Regarding soil erosion during Project operations, the potential is relatively low since the Project site would be fully developed, except for typical landscaping, which would include ground cover and trees to prevent soil erosion.

Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required.

**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?**

**Less Than Significant Impact.** A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. No largescale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project site or in the general Project vicinity. Therefore, the Project site is not located on a geologic unit or soil that is unstable. Additionally, no excavation activities are proposed as the Project would include 7,000 cubic yards of soil to be imported during the grading phase.

The Project site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. As such, the Project would not exacerbate existing conditions, such as unstable geologic units or unstable soil. In addition, as discussed previously, based on the depth to groundwater, liquefaction is unlikely at the Project site.

Furthermore, there is no evidence of natural or manmade voids or low density soils that could lead to ground subsidence or collapse. As such, impacts would be less than significant, and no mitigation measures are required.

**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?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for Project buildings, thus, posing a hazard to life and property. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying.

The Project site and immediate vicinity are fully developed, so no soil would be exposed to water and swell. The Project does not propose to expose the underlying soils permanently or inject soils with water that could cause it to swell as no excavation activities are expected to occur during construction. Therefore, the Project would not exacerbate any existing environmental conditions that could create substantial risk to life or property due to expansive soil.

Furthermore, the Project would comply with the LABC, and all on-site grading and site preparation would comply with the applicable provisions of the LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. As such, impacts related to expansive soils would be less than significant, and no mitigation measures are required.

**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?**

**No Impact.** A project would cause a significant impact if adequate wastewater disposal is not available. The Project site is located within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. The Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures are required.

**f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** A significant impact would occur if excavation or construction activities associated with the proposed Project would disturb paleontological or unique geological features. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project site is located within an urbanized area of the City and has been subject to prior grading and development. Therefore, surficial paleontological resources that may have existed at one time have likely been previously disturbed. As discussed previously, no excavation activities are expected to occur during construction. Therefore, the possibility does not exist that paleontological artifacts would be recovered during prior construction or other human activity. Nonetheless, pursuant to the California Health and Safety Code Section 7050.5 and PRC Section 5097.98, in the event that any prehistoric subsurface cultural resources are encountered at the Project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, with compliance with the California Health and Safety Code Section 7050.5 and PRC Section 5097.98, the Project's impact on paleontological resources would be less than significant, and no mitigation measures are required.

### **Cumulative Impacts**

Any future cumulative projects would be required to assess impacts to geologic features, soils and paleontological resources through the environmental review (CEQA) process. Additionally, as needed, projects would incorporate individual mitigation for site-specific geological units present on each individual project site. The proposed Project would have less than significant impacts and no mitigation would be required. Therefore, the proposed Project, in combination with past, present, and reasonably foreseeable future projects adjacent to the Project site would result in less-than-significant cumulatively considerable impacts.

## VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State’s climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business-as-usual activities (CARB 2008, Climate Change Scoping Plan.) The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California’s GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs) (CARB 2014, First Update to the Climate Change Scoping Plan). The 2017 Scoping Plan Update (CARB 2017, California’s 2017 Climate Change Scoping Plan), shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.<sup>40</sup> The 2030 target is an interim but important

<sup>40</sup> CARB. California’s 2017 Climate Change Scoping Plan. 2017. Accessed September 2024. [ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](http://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf).

stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor’s Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Aligning local jurisdiction action with State-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State’s GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed Statewide building code requirements, and play a critical role in facilitating the rollout of Electric Vehicle (EV) infrastructure. As a result, local government decisions play a critical role in supporting State-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs in the General Plan (Housing Element, Mobility Plan 2035) and regulations such as requirements for All-Electric Buildings, the Green New Deal Green Building Code, converting the City’s fleet to zero emission vehicles, and energy emissions retrofits.

**a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less Than Significant Impact.** The analysis of the Project’s GHG emissions consists of a quantitative analysis of the GHG emissions generated by the construction and operation activities and a qualitative analysis of the Project’s consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project’s impacts.

The total GHG emissions from the Project were quantified to determine the level of the Project’s estimated annual GHG emissions. As with the Air Quality section calculations, construction



emissions were estimated using CalEEMod by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source emissions factors. SCAQMD's Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold recognizes that construction-related GHG emissions from projects occur over a relatively short-term period of time and contributes a relatively small portion of a project's overall lifetime GHG emissions. The guidance recommends that a project's construction-related GHG emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operation GHG reduction strategies.

CalEEMod was also used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, fireplaces, and landscaping equipment. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Mobile-source emissions were estimated based on the CARB EMFAC model and the Project's Transportation Assessment.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on square footage as well as predicted water supply needs for this use. Energy demand (off-site electricity generation and on-site natural gas consumption) for the Project was calculated within CalEEMod using the CEC's CEUS data set, which provides energy demand by building type and climate zone.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for methane, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are Statewide averages, were used in this assessment.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the restaurant use; the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment; the GHG emission factors for the electricity utility provider; and the emission factors for the wastewater treatment process.

As shown in **Table 4.8-1: Construction GHG Emissions**, total construction emissions would be 394 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e). One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new

building requires its first major renovation.<sup>41</sup> As shown in **Table 4.8-1**, when amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 13 MTCO<sub>2e</sub> per year.

**TABLE 4.8-1: CONSTRUCTION GHG EMISSIONS**

Construction Phase	MTCO <sub>2e</sub> /Year
2026	393
2027	1
<b>Overall Total</b>	<b>394</b>
<b>30-Year Annual Amortized Rate</b>	<b>13</b>

*Notes: GHG = greenhouse gas; MTCO<sub>2e</sub> = metric tons of carbon dioxide equivalent.*

Source: Refer to **Appendix A: Air Quality Study**.

Operation of the Project has the potential to generate GHG emissions through vehicle trips traveling to and from the Project site. As mentioned previously, the facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day, at a quantity of two 8-hour shifts per day. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The new expanded facility would add approximately a maximum of 30 employees resulting in a total of 180 employees. Approximately 80 percent (144 employees) will work the day shift and approximately 20 percent (36 employees) will work the night shift. Similar to existing conditions, approximately 30 percent of the employees will continue to carpool or use public transportation. Therefore, approximately 126 cars will arrive and depart from the facility per day. The expansion would result in an addition of approximately 40 trucks/container arriving and departing the Project site per day, resulting in a total of 160 trucks/containers per day. Truck activity would continue to be conducted by appointment only, therefore no trucks would be idling off-site. Truck trips converted to PCE units at a ratio of 1.5 passenger cars results in 480 trips. As such, the proposed expansion would result in 732 daily trips.<sup>42</sup> In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the Project. Moreover, the Project site is currently developed with a solar panel system located on-site which has a 1.5 MWh capacity. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table 4.8-2: Operational GHG Emissions** below. As shown in **Table 4.8-2**, average annual operational emissions from the

<sup>41</sup> International Energy Agency (IEA). Energy Efficiency Requirements in Building Codes. Energy Efficiency Policies for New Buildings, IEA Information Paper. 2008.

<sup>42</sup> 126 employees arriving trips + 126 employees departing trips + 480 PCE trips = 732 daily trips

facility would be 5,153 MTCO<sub>2</sub>e per year, resulting in a net increase of 1,343 MTCO<sub>2</sub>e per year from the proposed Project.

**TABLE 4.8-2: OPERATIONAL GHG EMISSIONS**

Source	Unmitigated MTCO <sub>2</sub> e per year
Construction (amortized)	13
Area	6
Energy	1,806
Mobile	1,773
Waste	83
Water	228
Refrigeration	1,244
<i>Subtotal</i>	<i>5,153</i>
Existing	3,810
<b>Net Total</b>	<b>1,343</b>

*Abbreviation: MTCO<sub>2</sub>e = metric tons of carbon dioxide emissions.*

Source: Refer to **Appendix A: Air Quality Study**.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Assessing the significance of a project’s contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project’s GHG-related impacts on the environment. As discussed below, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As such, impacts would be less than significant.

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

**Less Than Significant Impact.** A significant impact would occur if the Project conflicted with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, focuses on reducing GHG emissions in California.<sup>43</sup> GHGs, as defined under AB 32, include carbon dioxide (CO<sub>2</sub>), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32

<sup>43</sup> California Air Resources Board (CARB). “Assembly Bill 32 Overview” (last reviewed August 4, 2014). Accessed September 2024. <http://www.arb.ca.gov/cc/ab32/ab32.htm>

requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In November 2017, CARB adopted an updated Climate Change Scoping Plan, which details strategies to meet that goal.

The Project would be designed in accordance with the latest Title 24 Energy Efficiency Standards, which represent an approximate improvement of 30 percent beyond the 2008 Standards that were used in assumptions for the City's CAP GHG analysis. Conformance with the latest standards is consistent with the City's objectives to reduce GHG emissions to meet regional and Statewide emission reduction targets. Therefore, the Project does not interfere with the State's implementation of (i) Executive Order B-30-15 and Senate Bill 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the State's implementation of GHG reduction plans described in the CARB's updated Scoping Plan.

Similar to existing conditions, approximately 30 percent of the employees will continue to carpool or use public transportation. The Project's convenient access to public transit and opportunities for walking would result in a reduction of vehicle trips, vehicle miles traveled (VMT) and GHG Emissions. Specifically, the Project site is located in a transit-rich neighborhood services by the Los Angeles County Metropolitan Transit Authority (Metro) and LADOT bus lines such as the Pacific Coast Highway at Blinn Avenue bus stop located to the south along Pacific Coast Highway.

The Project would be designed in accordance with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards, CALGreen standards, and City of Los Angeles Green Building Code. The primary measure of whether a project would have an impact on GHG emissions is whether it would conflict with applicable regulatory plans and policies intended to reduce GHG emissions; in this case, specifically the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal). Key policies of SCAG's 2020-2045 RTP/SCS include improving access and mobility and encouraging efficient transportation infrastructure and pedestrian improvements. The Project includes the expansion of an existing warehouse facility and would not result in a substantial increase in population within the City. Therefore, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant, and no mitigation measures are required.

## **Cumulative Impacts**

To achieve Statewide goals, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. Currently, there is no generally accepted methodology that exists to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h (3), the City as a lead agency, has determined that a project's contribution to cumulative GHG emission and global climate change would be less than significant if a project is consistent with the applicable regulatory plans and polices to reduce GHG emissions.

Accordingly, the analysis herein considered the potential for the proposed Project to contribute to the cumulative impact of global climate change. As stated previously, the proposed Project would not conflict with applicable plans, and future related projects would also be required to show consistency with applicable plans. As such, cumulative impacts would be less than significant during construction and operation.

## IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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 type="checkbox"/>	<input checked="" 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 which 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 type="checkbox"/>	<input checked="" type="checkbox"/>

The following section summarizes and incorporates by reference information from the ESA Phase I dated August 26, 2022, the CalGEM Well Finder, the Department of Conservation Construction Site Well Review dated July 5, 2023, the Asbestos Survey Report dated August 17, 2022, the methane report dated August 9, 2022 and Phase II dated September 14, 2023 all prepared by

Converse Consultants on behalf of the Applicant. The reports are included as **Appendix E.1** through **E.6** of this ND.

**a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The types and amounts of hazardous materials to be used for the Project would be typical of those used during construction activities and those typically used in the operation of cold storage facilities, as discussed in the following analysis.

**Construction**

The Project would not involve the routine transport of hazardous materials to and from the Project site during construction. During demolition and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction, and development of the Project on the Project site would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required.

**Operation**

As mentioned previously, the overall operation of the warehouse building would remain unchanged following the expansion. Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Operation of the Project could also involve the routine use of potentially hazardous materials typical of those used in a small medical facility, including biohazards waste and cleaning agents. As with Project construction, all hazardous materials used on the Project site during operation would be used, stored, and disposed of in accordance with all applicable federal, State

and local requirements. Therefore, with implementation of appropriate hazardous materials management protocols at the Project site and compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant and no mitigation measures are required.

**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?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. According to the Phase I ESA Report (refer to **Appendix E.1**), methane gas issues, soil and groundwater contamination were identified within the Project site. Based on prior Project site investigations conducted between 1988 and 1994, it was determined that no further action regarding the contaminated groundwater was warranted, and the contaminated soil was remediated. The Phase I ESA Report identified three (3) Recognized Environmental Conditions (RECs) relating to (1) methane gas, (2) groundwater contamination and (3) soil staining. Methane gas was identified as a REC and methane gas should continue to be monitored. Second, the refining operations within the vicinity of the Project site were speculated as the cause of groundwater contamination and was identified as a REC. Soil staining observed at the north end of the railroad from wastewater generated from the wash down of equipment was identified as a REC. Thus, soil sampling of the discolored soil should be conducted, and based on the sample results, soil should be disposed of appropriately.

The Project site's historical use for coke-calcining operations and receiving illegal contaminated soil was identified as a Historical Recognized Environmental Condition (HREC), which was granted closure on the remediation. The stained soil observed northwest of the Project site building was identified as an environmental concern as the water used to wash down concrete at the Project site was generated with a cleaning solution. This operation should cease, and all wastewater diverted to the clarifier as intended. Additionally, an online research was completed with the California Department of Conservation's CalGEM (refer to **Appendix E.2**), which identified one (1) plugged and abandoned oil and gas well on the north side of the Project site, as the Project site is in the Wilmington Oil Field. While such wells can be considered environmental concerns due to their potential for subsurface or surface integrity issues, the identified well is appropriately documented as plugged and abandoned. No evidence has been provided to suggest that this well poses a significant hazard under current conditions. Additionally, a Construction Site Well Review (refer to **Appendix E.3**) was conducted by the California Geologic Energy Management Division (CalGEM). It was determined the planned construction activities for the proposed project will not directly interact with or affect the integrity of the abandoned well, as the project design avoids any subsurface activities in its vicinity. Therefore, no further action or mitigation is warranted with respect to this well, and the project is not anticipated to result in any adverse impacts related to its presence.



A Phase II ESA Report (refer to **Appendix E.6**), was prepared to evaluate the remaining RECs, environmental concerns, and to identify if potential target analytes were present at concentrations greater than threshold criteria. Data indicated that the total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals are a concern. **Appendix E.6** included a total of four (4) borings to depths of 8 feet below ground surface (bgs) and soil samples were collected from each boring at depths of two (2), four (4) and eight (8) feet bgs. Soil samples analyzed for TPH, VOCs, SVOCs, and Title 22 Metals. Based on the assessments conducted, a total of 12 metals were detected in the soil samples.

With the exception of arsenic, all other metal concentrations are less than their respective screening levels for both residential and commercial use, and all reported metals concentrations were less than their respective hazardous waste threshold values. Arsenic concentrations in two (2) samples exceeded the DTSC regional background level, however, in the shallower samples, arsenic levels were less than the regional background level. TPH-Diesel concentrations exceeded the residential screening level but were less than the commercial level. All other reported TPH concentrations including those in the gasoline and diesel range were reported to be less than their respective residential screening levels. Seven (7) SVOCs were reported in sample K2-2, and no other SVOCs were detected in any other samples. Benzo(a)pyrene was found to exceed the residential screening level; however, it was less than the commercial screening level. All other SVOC concentrations were less than their respective residential and commercial screening levels. One (1) VOC was reported in one (1) of the samples analyzed. The PCE concentration in sample K3-4 was less than the residential and commercial screening levels.

Based on the findings, wastewater from equipment wash down operations does not appear to be affecting soil conditions as no compounds were reported in samples in excess of residential screening levels. The shallow soil sample by the Project site's loading docks was reported to have TPH diesel and SVOC concentrations that exceed screening levels for residential land use, but no significant impacts were identified in the deep sample from 4 feet bgs. Samples where water appears to pond around the rail lines were reported to have concentrations of TPH-diesel and/or arsenic in excess of residential or background levels. Concentrations in the shallower samples from these locations were less than screening levels. The identified impacts appear to generally be limited in vertical extent, and/or to not pose a significant exposure risk. Additionally, aside from arsenic, all reported concentrations are less than screening levels for commercial and industrial land uses. Arsenic concentrations exceeding the DTSC regional background level were covered by at least two (2) feet of soils that have concentrations within the background range, and all arsenic concentrations are less than hazardous waste thresholds. Therefore, according to the Phase II ESA Report prepared for the Project site, no further assessment would be required.

## **Methane**

The Project site is located in a Methane Zone.<sup>44</sup> These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems.

The City requires the following for projects located within a Methane Zone: prior to the issuance of a building permit, the Applicant will be required to have the Project site to be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC. As a matter of regulatory compliance, the engineer will be required to measure subsurface soil gas concentrations and pressures of methane at the Project site and investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level, which will prevent potential methane gas seepage into the building.<sup>45</sup>

According to the Methane Report (refer to **Appendix E.5**), a methane investigation was conducted with consisted of the installation of eight (8) shallow probes at a depth of 5 feet bgs and four (4) deep probe sets were installed at 5, 10 and 20 feet below the lowest proposed bottom of footings. The result of the investigation revealed methane levels between 0.0 percent and 1.0 percent for the shallow probes and 0.0 percent to 8.4 percent for the deep probes. Based on the reported methane levels, the Site would fall under Methane Zone Site Design Level V (methane concentrations greater than 12,500 ppmv). Sites located within Methane Zones have the potential to be affected by the release or explosion of methane gas. The proposed Project would be required to comply with the regulatory compliance measures for sites located within the Methane Zone, pursuant to LAMC Sec. 91.7103 and as enforced by the LADBS Methane Mitigation Standards. The proposed Project would adhere to methane mitigation requirements for Site Design Level V, and would require a passive system to be installed along with compliance with the Los Angeles Methane Seepage Regulations. The passive system would include a subslab vent system, vent risers and an impervious membrane. Additionally, the active system would include a gas detection and alarm, mechanical ventilation of the lowest occupied space, mechanical extraction and a control panel with trench dams and conduit or cable seal fittings.

Additionally, the Applicant will be required to implement the engineer's design recommendations subject to the California Division of Oil, Gas, and Geothermal Resources (DOGGR), LADBS and Los Angeles Fire Department (LAFD) plan review and approval. Construction workers would be protected from methane exposure through compliance requirements regulated by the Division of Occupational Safety and Health (Cal/OSHA).

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<sup>44</sup> City of Los Angeles. Methane and Methane Buffer Zones. Accessed September 2024. <https://www.geoforward.com/los-angeles-methane-zones/>.

<sup>45</sup> LADBS. Methane Mitigation Standards. Accessed September 2024. <https://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigation-standards>.

As such, with adherence to regulatory compliance measures, impacts would be less than significant.

### **Asbestos**

According to the Asbestos Report (refer to **Appendix E.4**), an asbestos survey was conducted in the interior and exterior areas of the Project site for suspect asbestos-containing materials (ACMs) and homogenous areas (areas that have uniform color, texture, and appearance). The sampled suspect materials did not contain any asbestos. However, the following suspect materials were not sampled due to the non-destructive survey: roofing materials, CMU mortar and possible adhesive material on insulated wall panels. Pursuant to federal and State regulations, all suspect ACMs should either be presumed to contain asbestos or adequate rebuttal sampling should be conducted by an accredited Building Inspector prior to demolition or renovation. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The Project would be required to comply with SCAQMD Rule 1403 to ensure proper removal of ACMs during demolition activities.<sup>46</sup> Disturbance of any asbestos-containing material (ACM) would be handled in accordance with applicable local and State regulations, which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529.

### **Lead**

Due to the age of the building on the Project site, there is a potential that lead-based paint (LBP) is present. Cal/OSHA regulations require that specific work practices be implemented when handling construction materials and debris that contain lead-containing materials. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 Code of Federal Regulations (CFR) 1910.1025 and 1926.62. Local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the US Department of Housing and Urban Development (HUD).<sup>47</sup>

### **Polychlorinated Biphenyl**

Polychlorinated biphenyls (PCBs) were historically used as coolants and lubricants in transformers, capacitors, and other electrical equipment beginning in 1929 because they do not burn easily and serve as a good insulating material. Although the Department of Toxic Substances

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<sup>46</sup> SCAQMD. Fugitive Dust Rule 403. Accessed September 2024. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>47</sup> U.S. Department of Housing and Urban Development. Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Accessed September 2024. [https://www.hud.gov/program\\_offices/healthy\\_homes/lbp/hudguidelines](https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines).

Control (DTSC) is a lead regulatory agency for site cleanups in California, engagement with the US EPA is required when addressing PCB-contaminated sites. Since Toxic Substances Control Act (TSCA) PCB regulations are not delegated, US EPA is the regulatory lead for the cleanup of PCBs under the TSCA PCB cleanup requirements in 40 CFR 761.

Two (2) pad-mounted electrical transformers were observed on site. The transformers are owned and operated by the Department of Water and Power (DWP). No staining was observed on concrete pads beneath the equipment. The ballasts do not represent a recognized environmental concern but should be handled in accordance with 40 CFR 761 upon demolition or renovation.

### **Underground Storage Tanks (UST)**

Several adjacent sites were identified from regulatory listings as having USTs, however, no specific information was provided as these facilities were not listed on the RWQCB Geotracker website and the groundwater beneath the Property has been identified with low level of VOCs.

Compliance with the following regulations will ensure the safe removal of any potential USTs: Los Angeles Fire Code, Division 5 and 31;<sup>48</sup> California Health & Safety Code, Division 20, Chapter 6.7;<sup>49</sup> CCR, Title 23, Division 3, Chapter 1654; and LAMC Article 7 of Chapter V, Section 120, 2301 and 5003. With compliance with these regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation measures are required.

#### **c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant Impact.** No schools are located within a one-quarter mile radius from the Project site. As discussed previously, construction of the Project would involve the use of those hazardous materials that are typically necessary for construction of a mixed-use building containing residential and commercial uses. As such, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. In addition, construction of the Project would involve expansion of the existing warehouse building which, due to its age, may contain asbestos and lead-based paints and materials. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and Cal/OSHA regulations regarding lead-based paint. Thus, construction activities associated with the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste

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<sup>48</sup> LAFD. UST Tank Abandonment Guidelines. Accessed March 2020. <https://www.lafd.org/fire-prevention/cupa/ust-tank-abandonment-guidelines>.

<sup>49</sup> California Water Boards. Underground Storage of Hazardous Substances. Accessed September 2024. [https://www.waterboards.ca.gov/ust/regulatory/docs/hs\\_chp7\\_w\\_additions.pdf](https://www.waterboards.ca.gov/ust/regulatory/docs/hs_chp7_w_additions.pdf).

within one-quarter mile of an existing or proposed school. As such, impacts would be less than significant and no mitigation measures are required.

**d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Less Than Significant Impact.** A significant impact would occur if the Project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the DTSC (EnviroStor), the State Water Board (GeoTracker), and CalEPA. Based on a review of these databases, the Project site is not located on a list of hazardous material sites compiled pursuant to Section 65962.5. Additionally, the Project site is not included on any State hazardous site list and would not pose an environmental hazard to people on the Project site or to surrounding sensitive uses.<sup>50</sup> As such, the Project would not exacerbate existing conditions. Impacts would be less than significant, and no mitigation measures are required.

**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?**

**No Impact.** A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The Project site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Long Beach Airport located approximately 4.5 miles northeast of the Project site. Given the distance between the Project site and Long Beach Airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur and no mitigation measures are required.

**f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, the nearest designated disaster route to the Project site is along Alameda Street. However, due to the orientation Alameda Street and the Project site

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<sup>50</sup> State of California Department of Toxic Substances Control. “Hazardous Waste and Substances Site List.” EnviroStor. Accessed September 2024. <https://www.envirostor.dtsc.ca.gov/public/>.

the nearest accessible designated disaster route is along Pacific Coast Highway.<sup>51,52</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Operation of the Project would generate traffic in the Project vicinity and but would not result in modifications to site access. The Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. The Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and, as such, impacts related to the implementation of the City's emergency response plan would be less than significant and no mitigation measures are required.

**g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** A significant impact would occur if the proposed Project exposed people and structures to high risk of wildfire. The Project site is located in an urbanized area without wildlands in its vicinity. The Project site is not located within a City-designated Very High Fire Hazard Severity Zone<sup>53</sup> or a City-designated fire buffer zone.<sup>54</sup> Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential, educational, and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur and no mitigation measures are required.

## Cumulative Impacts

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. The individual Project-level impacts associated with hazards and hazardous materials were found to be less than significant with adherence to regulatory compliance measures. Similarly, potential cumulative projects would

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<sup>51</sup> City of Los Angeles Department of City Planning. "General Disaster Prevention, Response and Recovery." General Plan Safety Element. November 2021. Accessed September 2024. <https://planning.lacity.org/plans-policies/general-plan-overview>.

<sup>52</sup> Los Angeles County Department of Public Works. "Disaster Route Maps." City of Los Angeles Central Area. May 2014. Accessed September 2024. <https://planning.lacounty.gov/generalplan/figures2015>.

<sup>53</sup> City of Los Angeles Department of City Planning. "Parcel Profile Report." ZIMAS. Accessed September 2024. <http://zimas.lacity.org/>.

<sup>54</sup> City of Los Angeles Department of City Planning. "General Plan Land Use in Very High Fire Hazard Severity Zones." General Plan Safety Element. November 2021. Accessed September 2024. <https://planning.lacity.org/plans-policies/general-plan-overview>.

be required to comply with all such requirements and regulations, to be consistent with the provisions set forth by CEQA and the CEQA Guidelines, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified.

Development of similar future projects would cumulatively increase development intensity, population, and traffic in the region, thereby exposing a greater number of people to potential hazards in the area (e.g., hazardous materials and/or waste contamination, and fire). As described previously, the proposed Project and other potential future projects would be required to comply with applicable local, State, and federal requirements concerning hazardous materials. Additionally, adverse effects of hazards and hazardous materials tend to be localized; therefore, impacts from nearby projects would be limited, if any, and the Project site would be primarily affected by the proposed Project activities. Therefore, the proposed Project would not contribute to any significant cumulative hazardous materials impacts.

## X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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 substantially 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<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"/>

**a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all



applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

### **Construction**

During Project construction and demolition activities, stormwater runoff from the Project site could cause erosion and/or transport sediment off site and into municipal storm drain systems. Thus, pollutant discharges associated with storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in adverse impacts to water quality. The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

With compliance with these existing regulatory requirements, impacts to water quality and waste discharge requirements during construction would be less than significant, and no mitigation measures would be required.

### **Operation**

Operation of the Project would introduce sources of potential water pollution that are typical of commercial developments, including studio uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's LID Ordinance (Ordinance No. 181,899), best management practices (BMPs) would be implemented on-site to address City and State water quality requirements. The Project would not violate any water quality standards or waste discharge requirements through compliance with these regulatory requirements for stormwater and non-stormwater discharges; i.e., implementation of LID standards and best management practices. Therefore, impacts to surface water quality would be less than significant and no mitigation measures are required.

**b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would substantially deplete groundwater or interferes with groundwater recharge. Implementation of the proposed Project would not result in a substantial change in the amount of pervious and impervious surface across the Project site nor would it impede sustainable groundwater management of the basin. Similar to existing conditions, redevelopment of the Project site would result in a negligible amount of on-site groundwater recharge opportunities and would not impact groundwater wells, change the rate or direction of flow of groundwater, impact groundwater recharge areas, or impede sustainable groundwater management of the basin. As explained previously, the excavations and grading activities would be limited, therefore excavation activities are not likely to interfere with the groundwater table. As such, impacts would be less than significant and no mitigation measures are required.

**c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**i. Result in substantial erosion or siltation on- or off-site;**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. The Project site is located in a highly urbanized area. There are no natural water courses on the Project site or in the vicinity. As discussed previously, the Project is developed with paved surfaces, and current stormwater runoff flows to the local storm drain system. Additionally, the LID will improve the drainage pattern with less runoff leaving the Project site. As such, the proposed Project would not result in a substantial alteration to the existing drainage pattern or to any drainage course; no erosion or siltation impacts related to such alteration would occur. Impacts would be less than significant, and no mitigation measures are required.

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

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would substantially alter the drainage pattern of an existing stream or river such that flooding would result. There are no streams or rivers within or immediately surrounding the Project site. Construction activities on the Project site may temporarily on the Project site may temporarily alter the existing drainage patterns of the site and reduce off-site flows. However, construction and operation of the proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on or off site with implementation of the LID program. As such, impacts would be less than significant and no mitigation measures are required.

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

**Less Than Significant Impact.** A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the Project site, or if the proposed Project would substantially. The City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) contain requirements for construction activities and operation of development and redevelopment projects to integrate low impact development practices and standards for stormwater and other related requirements in the City's Development BMPs Handbook. Such regulations and practices are designed in consideration of existing and planned stormwater drainage systems. Conformance would be ensured during the permitting process with the Department of Building & Safety and impacts would remain less than significant and no mitigation measures are required.

- iv. **Impede or redirect flood flows?**

**No Impact.** A significant impact would occur if the proposed Project would be located within a 100-year or 500-year floodplain or would impede or redirect flood flows. The Project site is not located within a 100-year or 500-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.<sup>55,56</sup> Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required.

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

**No Impact.** A significant impact would occur if the proposed Project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. As discussed previously, the Project site is not located within a 100-year flood hazard area as mapped by FEMA or by the City of Los Angeles.<sup>57,58</sup> In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project site as being located within a flood control basin or within a potential inundation area.<sup>59</sup> The Project site is located approximately five (5) miles north of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project site as being located within an area potentially affected by a tsunami.<sup>60</sup> Therefore, no tsunami or tsunami events would

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<sup>55</sup> Federal Emergency Management Agency (FEMA). Flood Insurance Rate Map, Panel Number 06037C 1595F. Effective September 26, 2008.

<sup>56</sup> City of Los Angeles. "Tsunami." 2018 Local Hazard Mitigation Plan. Flood, Figure 12-1, p. 12-4..

<sup>57</sup> Federal Emergency Management Agency (FEMA). Flood Insurance Rate Map, Panel Number 06037C 1595F. Effective September 26, 2008.

<sup>58</sup> City of Los Angeles. 2018 Local Hazard Mitigation Plan. Flood, Figure 10-11, p. 10-33.

<sup>59</sup> City of Los Angeles. "Tsunami." 2018 Local Hazard Mitigation Plan. Flood, Figure 12-1, p. 12-4.

<sup>60</sup> City of Los Angeles. "Tsunami." 2018 Local Hazard Mitigation Plan. Flood, Figure 12-1, p. 12-4.

be expected to impact the Project site. No impacts would occur, and no mitigation measures would be required.

**e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less than Significant Impact.** The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is and would continue to be collected on the site and directed toward existing storm drains having adequate capacity in the Project vicinity.

Potential pollutants generated by the Project would be typical of land uses within the Project vicinity and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans. The increase in pervious areas would improve the groundwater recharge capacity of the Project site over existing conditions. Since the Project's LID BMP design is for biofiltration, treated runoff would be discharged into the storm drain system, away from the structures and groundwater table.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required.

**Cumulative Impacts**

The Project site is within an urbanized area with developed surrounding properties. Like the proposed Project, potential cumulative projects would adhere to the City's Stormwater and Urban Runoff Pollution Control regulations, LID Ordinance and would implement appropriate stormwater pollution control measures and related BMPs into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

## XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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*Would the project:*

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Physically divide an established community?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |

### a. Physically divide an established community?

**Less than Significant Impact.** A significant impact would occur if the proposed Project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. The Project site is currently developed with an existing warehouse building and associated parking. The Project site is located in a highly urbanized area characterized heavy industrial uses to the east, single-family residential uses to the west and commercial uses to the southwest. There is no existing residential use on the Project site or a residential use that would be physically separated or otherwise disrupted by the Project because the proposed development would remain within the boundary of the existing Project site. There are no vacant or undeveloped areas around the Project site, such that development of the Project could possibly divide an established community or result in a separation of uses or disruption of access between land uses around the Project site. Implementation of the Project would result in further infill of an already developed community and on a site that is already built out with an existing warehouse facility. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project site. Lastly, the Project does not propose a freeway or other large infrastructure or barrier that would divide a community. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Therefore, the impact would be less than significant.

### 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?

**Less than Significant Impact.** A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project involves the expansion of an existing warehouse building which includes demolition and alteration of 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet, resulting in a net addition of approximately 44,174 square feet of new floor area. Properties surrounding the subject property

are zoned M3-1VL to the east along Alameda Street with heavy industrial uses, R1-1XL-O-CUGU to the west along Drumm Avenue with single-family residential uses and C1-1VL-O-CUGU to the southwest along Pacific Coast Highway with commercial uses.

The Project site is located within the Wilmington – Harbor Community Plan Area which designates the commercially-zoned portion of the subject property for Restricted Light Industrial land uses corresponding to the MR2 zone. The Project site is zoned [Q] MR2-1 VL-CUGU (Restricted Light Industrial) and [Q] M3-1VL-CUGU (Heavy Industrial). The proposed Project would not conflict with the Project site's General Plan designation of Light Industrial use. The Project site is currently developed with a one-story (varying heights between 26 to approximately 42 feet) 221,496 square foot cold storage facility used to store wholesale food products for third party users. The proposed Project would contain a maximum Floor Area Ratio (FAR) of 0.38:1 and would be 65 feet in height (not including rooftop equipment) which exceeds the 45-foot height limit currently allowed per the applicable zoning. Thus, in order to ensure the development of the proposed Project would not conflict with applicable zoning such as the current height limit, the Applicant would request entitlements as detailed below.

In order to facilitate the development of the proposed Project, the Applicant is requesting the following entitlements: (1) a General Plan Amendment from Light Industrial land use (45-foot height limit) to Light Industrial land use (site-specific 65-foot height limit), pursuant to LAMC Sec. 11.5.6-B; (2) a change of Height District from 1VL to 1L-D, pursuant to LAMC Sec. 12.32-B; (3) a Zoning Administrators' Determination to permit a Transitional Height of 65 feet in lieu of 61 feet otherwise permitted by LAMC Sec. 12.21.1-A,10 for building located 100 feet to 199 feet from lots classified in the R1 Zone, pursuant to LAMC Sec. 12.24-X,22; (4) Site Plan Review for a project adding more than 50,000 square feet of nonresidential floor area; and (5) a waiver of dedication and improvement requirements for public rights of way, in conjunction with the construction, use and maintenance of an approximately 60,403 square feet of cold storage area, mechanical area, and office area building additions.

The Project site is located within the CUGU District (ZI-2458). As previously described in **Section 3.2, Environmental Setting**, the Project site complies with the CUGU and does not require either a CUGU Adjustment or a CUGU Exception. Additionally, due to the proximity to an oil well located on the northern portion of the site, as identified in ZIMAS by ZI-1195, a construction site well review (CSWR) must be completed by the California Department of Conservation. However, the plugged and abandoned oil well would not require further action at this time. Furthermore, the Project site is located within ZI-2514 (Trucking Related Use Regulation Ordinance), which provides goals to safeguard the public health, welfare, and safety of the Wilmington and Harbor City communities, which are the most affected by trucking-related activities. The Project site is not within the boundaries of or subject to any specific plan, community design overlay, or interim control ordinance.

The Wilmington-Harbor Community Plan (Plan) seeks to protect residences from noxious environmental impacts of industrial activities. More specifically, the Plan identifies issues related to truck traffic invading local residential streets. As mentioned previously, the site currently provides vehicular and pedestrian access through the Coil Avenue security gate on the southwest

corner of the property through Pacific Coast Highway. The proposed Project's consistency with the Plan is addressed below in **Table 4.11-1: Consistency with the Wilmington-Harbor Community Plan**. The main path of access surrounding the facility is by driving along the south and west side of the facility. There are no active vehicle entrances or exits on the west side of facility along Drumm Avenue where residential uses are located. The overall operation of the warehouse building would remain unchanged following the expansion and would continue to protect the residences located along Drumm Avenue. Additionally, the Plan seeks to protect industrially zoned land, where it does not encroach into predominantly residential areas, to capitalize upon the District's strategic proximity to the Port of Los Angeles through the creation of new, diverse industrial activities and commensurate employment opportunities. In portions of Harbor City and Wilmington where industrial strips or pockets of land lie adjacent to residential areas, the Plan designates Limited or Light Industrial land uses with corresponding MR restricted zoning classifications, which are intended to stabilize the industrial land reserve while assuring that industrial development be compatible with adjacent land uses.

**TABLE 4.11-1: CONSISTENCY WITH THE WILMINGTON-HARBOR COMMUNITY PLAN**

Goals and Policies	Consistency Analysis
Preserving a strong industrial base to provide jobs for residents and promote economic vitality within the Plan area.	<b>Consistent.</b> The proposed Project's improvement and expansion of the existing warehouse building would continue to promote economic vitality within the Plan area and would expand the industrial employment for residents with the addition of approximately 30 new employees.
Protection of residents from noxious environmental impacts of industrial activities	<b>Consistent.</b> As discussed, the proposed Project would be consistent with applicable regulatory plans and policies to reduce GHG emissions. With respect to hazards and hazardous materials, the proposed Project would not emit hazardous emissions as the proposed Project's construction and operation would occur in conformance with all applicable local, State and federal regulations. Further, the proposed Project would adhere to applicable regulatory compliance measures to reduce the potential risk for the release or explosion of methane to affect the public or environment.
Adequate buffering of industrial areas from nearby residential and commercial uses.	<b>Consistent.</b> The proposed Project would not alter the overall operations of the Project site and would not substantially impact the surrounding areas, which consists of heavy industrial use, residential and limited commercial use. Further, the proposed Project would adhere to Ordinance No. 177243, which contains provisions to ensure there is adequate landscape buffering.
Illegal dumping and other criminal activities have occurred in some industrial areas.	<b>Consistent.</b> The proposed Project would continue to maintain the Project site's existing lighting and security measures. The Project site's security is available seven (7) days per week for 24 hours per

**TABLE 4.11-1: CONSISTENCY WITH THE WILMINGTON-HARBOR COMMUNITY PLAN**

Goals and Policies	Consistency Analysis
	day, and security devices are screened from public view. Additionally, the Project site provides ample lighting both externally and internally in order to maintain visibility in and around the structure to prevent any illegal activity within or surrounding the area.

As mentioned previously, the Applicant is requesting a change of the Height District from 1VL to 1L-D and would retain the General Plan designation of Light Industrial Use that currently exists on the site. Additionally, the Project conforms to the Plan by improving and expanding the existing warehouse building. This would maintain and expand the industrial employment within and immediately surrounding the community with the addition of approximately 30 new employees. The proposed Project's consistency with the City's General Plan is addressed below in **Table 4.11-2: Consistency with the General Plan Framework Element**. As such, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

**TABLE 4.11-2: CONSISTENCY WITH THE GENERAL PLAN FRAMEWORK ELEMENT**

Goals and Policies	Consistency Analysis
Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	<b>Consistent.</b> The proposed Project would be consistent with the City's vision for industrial growth that provides employment opportunities for the City's residents. The proposed Project's improvement and expansion of the existing warehouse building would add approximately 30 new employees.
Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit."	<b>Consistent.</b> The proposed Project would remain consistent with the City's goal of accommodating the development of industrial uses in areas designated as "industrial-Transit" as the proposed Project would improve and expand the existing warehouse within an "Industrial-Transit" area.
Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.	<b>Consistent.</b> The proposed Project would improve and expand the existing warehouse. The proposed Project would add a new freezer, remodel the existing interior freezer, designate room for a mechanical room, electrical room expansion, fire pump building and a new second floor building area for offices. As such, the proposed Project's implementation of improvements would assist in the expansion of existing industrial uses.



## **Cumulative Impacts**

The proposed Project and any future related projects would not conflict with land use policies and would be consistent with the City's General Plan, designations and zoning. As such, both the proposed Project and potential related projects would not alter the existing land use patterns. Additionally, no existing residential uses exist on the Project site and the proposed Project would not disrupt or divide an existing community, as the improvements and expansion of the existing cold storage facility would occur within the limits of the Project site. Similar to the Project, potential cumulative projects would not contain existing residential uses on the site and proposed development would be bound to the limits of the Project site. Therefore, the Project in combination with potential related projects, would result in less than significant impacts to an established community and to any land use plan, policy or regulation.

## XII. MINERAL RESOURCES

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

**a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** A significant impact would occur if the proposed Project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The Project site is located in a highly urbanized portion of the City and is not used for mineral resource extraction. No State-designated or locally designated mineral resource zones exist in the City. According to the Conservation Element of the City of Los Angeles General Plan, Mineral Resources, Exhibit A, the Project site is not classified by the City as containing significant mineral deposits, but is classified as being located in a State Designated Oil Field. However, the Project site is currently developed and does not include active mineral resource extraction operations. Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of local importance or value to the region or to the residents of the State. No impact would occur and no mitigation measures are required.

**b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**No Impact.** A significant impact would occur if the proposed Project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. No mineral extraction operations currently occur on the Project site. Furthermore, the Project site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the

California Geologic Survey.<sup>61,62,63</sup> The Project site is also not located within a City-designated oil field or oil drilling area.<sup>64,65</sup> The Project site is located in a State Designated Oil Field, however, the site is currently developed and does not include active mineral resource extraction operations.<sup>66</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required.

## Cumulative Impacts

The Project site is within a State Designated Oil field; however, the Project site is developed and does not include active mineral resource extraction operations. Thus, the implementation of the proposed Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. The proposed Project would not impact mineral resources, and therefore no cumulative impacts related to mineral resources would occur.

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<sup>61</sup> City of Los Angeles Department of City Planning. "Figure GS-1 Los Angeles Citywide General Plan Framework." Draft Environmental Impact Report. January 19, 1995.

<sup>62</sup> California Department of Conservation. "Aggregate Sustainability in California." California Geologic Survey. 2018.

<sup>63</sup> City of Los Angeles Department of City Planning. "Exhibit A." Conservation Element of the Los Angeles City General Plan. January 2001.

<sup>64</sup> City of Los Angeles Department of City Planning. "Exhibit A." Conservation Element of the Los Angeles City General Plan. January 2001.

<sup>65</sup> California Department of Conservation. DOC Maps. Accessed September 2024. <https://maps.conservation.ca.gov/>.

<sup>66</sup> City of Los Angeles Department of City Planning. "Exhibit A." Conservation Element of the Los Angeles City General Plan. January 2001.

### XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project result in:</i>				
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"/>

The following section summarizes and incorporates by reference information from the *Noise Study* prepared by Meridian Consultants, dated September 2024, on behalf of the Applicant. The Noise Study is included as **Appendix F** of this ND.

**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?**

**Less than Significant Impact.** A significant impact would occur if exposure of persons to or generation of noise levels are in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

**On-Site Construction Noise**

Construction activities that would occur during the construction phases (demolition, grading, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project site.

Noise from construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities that would occur during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each construction phase involves the use of different types of

construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be required.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously. As mentioned previously, properties surrounding the Project site are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 (Heavy Industrial) to the north and east along Alameda Street, R1-1XL-O-CUGU (One-Family Residential) to the west along Drumm Avenue and [Q]C1-1VL-O-CUGU (Limited Commercial) to the southwest along Pacific Coast Highway. The estimated construction noise levels were calculated for each of the analyzed receptors, ranging between 85 feet to 950 feet from the Project Site (refer to **Appendix F**) during each of the construction phases. Given the physical size of the Project site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. This is considered a worst-case evaluation because construction of the Project would typically use fewer pieces of equipment simultaneously at any given time as well as operating throughout the construction site (i.e., most of the time construction equipment would be operating at distances further away from the off-site receptors than that assumed in the forecasting of Project construction noise levels). As such, Project construction would often generate lower noise levels than reported herein.

**Table 4.13-1: Construction Maximum Noise Estimates** presents the maximum noise impacts that are forecasted to occur at each of the receptor sites. As shown, average noise levels during construction would not result in an increase above the absolute threshold of 80 dBA during any phase of construction. As such, construction noise levels would not be considered significant.

**TABLE 4.13-1: CONSTRUCTION MAXIMUM NOISE ESTIMATES**

Noise Monitoring Site	Calculated Noise Level (Leq-1hour) by Construction Phase					Absolute Threshold	Increase Above Significance Threshold
	Demolition	Grading	Building Construction	Paving	Architectural Coating		
Site 1	77.4	76.3	77.6	74.3	64.1	80	No
Site 2	72.2	70.5	71.7	68.5	58.3	80	No
Site 3	64.9	64.0	65.3	62.0	51.8	80	No
Site 4	57.9	59.8	61.1	57.8	47.6	80	No
Site 5	66.6	67.5	68.8	65.5	55.3	80	No
Site 6	59.7	60.7	62.0	58.7	48.5	80	No

Source: Refer to **Appendix F** for Construction Noise Worksheets

### **Off-Site Construction Noise**

Construction of the Project would require workers travelling to and from the Project site to work on the site, export soil, and deliver supplies to the site. Trucks traveling to and from the Project site would be required to travel along a haul route approved by the City. At the maximum, approximately 146 hauling trips per day would take place during the grading phase. Haul truck traffic would take the most direct route to the freeway ramp along Drumm Avenue and Pacific Coast Highway.

Noise associated with construction truck trips were estimated using the Caltrans Federal Highway Administration (FHWA) Traffic Noise Model based on the maximum number of truck trips in a day. Project truck trips which includes medium- and heavy-duty trucks would generate noise levels of approximately 58.9 to 63.7 dBA, respectively, measured at a distance of 25 feet from the adjacent sensitive receptor. As described in **Appendix F**, existing noise levels at the Project site range from 61.9 dBA to 76.9 dBA. The noise level increases from truck trips would be below the significance threshold of 5 dBA. As such, off-site construction noise impacts would be less than significant and no mitigation measures are required.

### **Operational Noise**

The facility includes designated outdoor break areas for employees. Noise from these areas is primarily associated with conversation and general use during breaks. These areas are located at the eastern portion of the site and are shielded by the existing cold storage facility, acting as a physical barrier between the break areas and the adjacent sensitive residential receptors along Drumm Avenue, thus reducing the transmission of noise off-site.

As mentioned previously, the expansion would decrease the length of the existing double rail spur and would also decrease the number of trains unloading stations from 18 down to 6. Overall operation of the cold storage facility would remain unchanged following the expansion and existing noise levels are not anticipated to increase.

Truck activity at the facility is conducted by appointment only, with trucks entering and exiting from Coil Avenue. The expansion would result in addition of approximately 40 trucks/container arriving and departing the Project site per day, resulting in a total of 160 trucks/containers per day. Operational truck trips which can include medium- and heavy-duty trucks would generate noise levels of approximately 59.3 dBA to 64.1 dBA, respectively, measured at a distance of 25 feet from the adjacent sensitive receptor. As described in **Appendix F**, existing noise levels at the Project site range from 61.9 dBA to 76.9 dBA. The noise level increases from truck trips would be below the significance threshold of 5 dBA. As such, operational truck noise impacts would be less than significant, and no mitigation measures are required.

### **Fixed Mechanical Equipment**

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate

noise-control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls, to comply with noise-limitation requirements provided in LAMC Section 112.02, which prohibits the noise from such equipment from causing an increase in the ambient noise level of more than 5 dBA. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance.

**b. Generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

In December 2023, Department of City Planning released their proposed updates to the construction noise and vibration thresholds. The proposed thresholds are intended to be suited to the generally urban nature of the City, while still recognizing the importance of human health, including sleep disruption. The Project would have a significant impact to vibration if it would exceed the following thresholds:

- Architectural Building Damage – Construction activities shall not exceed the following building damage thresholds for the identified structures:
- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older<sup>67</sup> Residential Structures: 0.3 PPV

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<sup>67</sup> Caltrans does not specify the age of the building to be considered. For vibration impact analyses, a building over 50 years can be considered an "older" residential structure.

- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

Ground-borne vibration impacts were evaluated by identifying potential vibration sources estimating the distance between vibration sources, vibration sensitive receptors, and surrounding structure locations; and making a significance determination based on the significance thresholds.

Construction activities for the Project have the potential to generate low levels of ground-borne vibration to vibration sensitive uses that include the surrounding residential uses. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

**Table 4.13-2: On-Site Construction Vibration Impacts—Building Damage** present construction vibration impacts associated with on-site construction in terms of building damage. As shown in **Table 4.13-2**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the surrounding residential uses. Therefore, construction vibration impacts would be less than significant and no mitigation measures are required.

**TABLE 4.13-2 ON-SITE CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE**

Site	Nearest Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment				Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Small bulldozer	
1	1630 E. Sandison Street	0.033	0.012	0.006	0.000	0.3
2	1614 E. Cruces Street	0.013	0.005	0.002	0.000	0.3
3	1351 Drumm Avenue	0.002	0.001	0.000	0.000	0.3
4	1325 Drumm Avenue	0.001	0.000	0.000	0.000	0.3
5	1600 E. Sandison Street	0.003	0.001	0.000	0.000	0.3
6	1502 E. Cruces Street	0.001	0.000	0.000	0.000	0.3

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.



**TABLE 4.13-2 ON-SITE CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE**

Site	Nearest Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment				Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Small bulldozer	

Refer to **Appendix F** for construction vibration worksheets.

- 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?**

**No Impact.** A significant impact would occur if the proposed Project would expose people residing or working in the Project area to excessive noise levels from a public airport or public use airport. The Project site is not located within the vicinity of a private airstrip or two miles of a public airport. The Project site is not within the Airport Influence Area of any of the listed airports.<sup>68</sup> The Project would not expose residents to excessive noise levels from aircraft. Therefore, no impact would occur, and no mitigation measures are required.

**Cumulative Impacts**

The proposed Project would have less than significant impacts related to construction and operational noise and vibration impacts. Due to this distance and uncertainty of construction timing, existing urban development, and the proposed Project’s less than significant noise impacts, development of cumulative projects would not result in an increase in ambient noise levels above a level of significance. Thus, cumulative noise impacts would be less than significant.

<sup>68</sup> Los Angeles County Airport Land Use Commission. Airports-Los Angeles County. Accessed September 2024. <https://planning.lacounty.gov/airport-land-use-planning/>.

## XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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)?**

**Less Than Significant Impact.** A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude.

**SCAG Regional Comprehensive Plan.** In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan (RCP) for the SCAG Region—Helping Communities Achieve a Sustainable Future. The RCP is a long-term comprehensive plan that provides a strategic vision for handling the region’s land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region. The following principles are based on the region’s adopted Compass Growth Vision Principles for Sustaining a Livable Region.

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.
- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

**SCAG Regional Transportation Plan Sustainable Communities Strategy.** On September 3, 2020, SCAG approved and adopted the 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 – 2045 RTP/SCS) a plan that the Regional Council now calls Connect SoCal. As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every four years. The Plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region’s sustainable future. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region.

According to the growth estimates from SCAG’s RTP/SCS, the City had an estimated employment population of 1,831,457 in 2020 and is projected to have an employment population of 2,169,100 in 2040. The warehouse would result in 180 employees, an increase of 30 employees when compared to the existing warehouse. The addition of employees would be less than 0.01 percent of SCAG’s employment forecast for the City. While the proposed use would provide new employment opportunities, the proposed use is not considered a unique use that would draw substantial new residents to the area to fulfill jobs.

As such, the Project would not result in substantial indirect or induced unplanned population growth. Therefore, impacts would be less than significant and no mitigation measures are required.

**b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** A significant impact would occur if the proposed Project would displace a substantial quantity of existing residences or a substantial number of people. The Project would expand the current capacity of the existing warehouse. No displacement of existing people or housing would occur upon implementation of the Project. No impacts would occur and no mitigation measures are required.

### **Cumulative Impacts**

Population growth in the City has the potential to result in cumulatively significant environmental impacts. City planning documents, such as the General Plan, have been prepared to be consistent with population forecasts identified for the region. As described previously, the proposed Project is not anticipated to cause significant population growth as employees are expected to be current residents of the City. Furthermore, any future development would be

required to comply with applicable federal, State and local regulations related to population and housing, including any potential affordable housing replacement requirements. Required compliance with these regulations would ensure impacts related to population and housing would be less than significant. Thus, impacts related to population and housing would not be cumulatively considerable.

## XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<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 checked="" type="checkbox"/>	<input 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"/>

### a. Fire protection?

**Less Than Significant Impact.** A significant impact would occur if the LAFD could not adequately serve the proposed Project, necessitating a new or physically altered station. Fire protection and emergency medical services to the Project site would continue to be served by the LAFD. The nearest LAFD station to the Project site is Station 38, located at 124 East I Street, approximately 1.22 miles southwest of the Project site. Fire Station 38's average response time is approximately six (6) minutes and is equipped with one (1) aerial ladder truck, a triple combination fire engine and one (1) rescue ambulance. Additionally, Station 49, located at 400 Yacht Street, is located approximately 1.88 miles to the south. The City's standard for distance to a fire station is 1-1/2 miles.<sup>69</sup> Given the proximity of the Project to Station 38, response time would not be substantial and new or expanded facilities would not be needed. Therefore, impacts would be less than significant, and no mitigation measures are required.

### b. Police protection?

**Less Than Significant Impact.** A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed Project, necessitating a new or physically altered station. The Project site is located within the area served by the Harbor Community Station of the LAPD, located at 2175 John S. Gibson Boulevard (approximately 3.44 miles southwest of the Project site). The proposed Project includes improvements to the existing warehouse building, resulting in approximately 60,403 square feet of cold storage area,

<sup>69</sup> City of Los Angeles Department of City Planning. "Chapter 9 Infrastructure and Public Services." General Plan Framework.

mechanical area, and office area building additions. The increase of 20 to 30 employees from the proposed Project expansion are expected to be current residents of the City. As such, the proposed Project would not result in any population and housing growth given the current uses on the Project site. Thus, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the proposed Project and maintain acceptable service ratios, response times, or other performance objectives for police protection. Furthermore, the proposed Project would not impact or alter the current safety features of the Project site, and the overall general operation would remain unchanged following the expansion, including lighting and site security measures. The Project site's existing security is available seven (7) days per week for 24 hours per day, and security devices are screened from public view. Additionally, the Project site provides ample lighting both externally and internally in order to maintain visibility in and around the structure to prevent any illegal activity within or surrounding the area. Therefore, impacts would be less than significant, and no mitigation measures are required.

#### **c. Schools?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The proposed Project is an expansion of the existing warehouse building. The proposed Project would result in a net increase of 20 to 30 employees. The Project would expand an existing, nonresidential use. As such, the proposed Project is not anticipated to generate a substantial increase in regional employment or population growth that would exceed the capacity of the school district. Further, the proposed Project would adhere to applicable impact fees. As authorized under Section 17620(a) of the California Education Code (CECC) and Section 65995(b) of the California Government Code (CGC), local school districts are authorized to impose and collect school impact fees for all residential and non-residential development activities that occur within their jurisdiction to off-set the additional costs associated with the new students. For new construction, the chargeable covered and enclosed space of commercial or industrial construction would not include the square footage of any existing structure on the site of construction as of the date the first building permit is issued for any portion of that construction. Therefore, impacts would be less than significant, and no mitigation measures are required.

#### **d. Parks?**

**No Impact.** A significant impact would occur if the proposed Project would exceed the capacity or capability of the local park system to serve the proposed Project. Parks and recreational facilities in the vicinity of the Project site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate two-mile radius of the Project site include but not limited to: East Wilmington Greenbelt Park (located approximately 0.12 mile southwest from the Project site); Banning Recreation Center (located approximately 0.70 mile west from the Project site); and Wilmington Town Square Park (approximately 1.22 miles southwest from the Project site).

As a screening criterion for impacts on parks, the *L.A. CEQA Thresholds Guide* considers whether a proposed Project would result in a net increase of 50 residential units or more that would adversely impact recreation and park services and/or facilities due to the Project's proximity, or expected usage of, those facilities or services. The Project does not meet this screening criterion. As such, no impacts would occur, and no mitigation measures are required.

**e. Other public facilities?**

**Less Than Significant Impact.** A significant impact would occur if the proposed Project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the Project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. As a screening criterion for impacts on libraries, the *L.A. CEQA Thresholds Guide* considers whether a proposed Project would result in a net increase of 75 residential units. The Project does not meet this screening criterion. As such, the Project would not result in significant impacts on library facilities. Impacts would be less than significant, and no mitigation measures are required.

**Cumulative Impacts**

As discussed previously, impacts to public services from the proposed Project would be less than significant. In addition, the proposed Project would not increase the demand for local schools, parks or public facilities. Thus, the proposed Project would not cumulatively combine with potential related projects to have an impact on such facilities. Cumulative projects would also be required to undergo environmental review, in compliance with the requirements of CEQA. Should potential impacts to public services be identified, appropriate mitigation would be prescribed that would reduce impacts to less-than-significant levels. Because the proposed Project would not create a significant impact on public services, and other potential cumulative projects would also be expected to avoid or mitigate impacts on public services, cumulatively significant impacts are anticipated to be less than significant.

## XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>

**a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

**Less Than Significant Impact.** A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project involves the expansion of an existing warehouse building, that would result in a net increase of 20 to 30 employees. The Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. In conclusion, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required.

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

**Less Than Significant Impact.** The Project site contains a small outdoor break area for employees consisting of tables and chairs; however, the Project site does not contain any recreational facilities. The Project would not include the development of public recreational facilities or require the expansion of recreational facilities. As mentioned previously, the Project involves the expansion of an existing warehouse building. The Project site is designated for light manufacturing land uses and zoned Restricted Light Industrial. Additionally, the proposed Project involves improvements and expansion of the existing warehouse facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer resulting in an approximately 60,403 square feet of cold storage area, mechanical area, and office area. Therefore, the Project would not require the construction or expansion of recreational facilities. As such, impacts would be less than significant and no mitigation measures are required.



## **Cumulative Impacts**

The proposed Project would have a less than significant impact on recreational facilities. The proposed Project involves the improvement and expansion of the existing cold storage facility, and the proposed Project does not propose the development of public recreational facilities. Furthermore, the proposed Project does not propose residential uses, which increases demand for recreational facilities. As such, the proposed Project would not cumulatively combine with potential related projects to have an impact on parks and recreational facilities. Cumulative impacts would be less than significant.

## XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

The following section summarizes and incorporates by reference information from the City of Los Angeles VMT Calculator (refer to **Appendix G.1**) and the Transportation Study Assessment Referral Form (refer to **Appendix G.2**).

**a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Less than Significant Impact.** A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Trip generation estimates for the Project were calculated based on the latest edition of the Institute of Transportation Engineers' *Trip Generation* manual (refer to **Appendix G**). The new expanded facility would add approximately a maximum of 30 employees and cars per day and a maximum of 40 trucks/containers per day, resulting in a total of 160 trucks/containers per day. The warehouse would result in 448 daily trips and 3,371 vehicle-miles travelled (VMT).

As stated per the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG),<sup>70</sup> a new development would have potential impacts when work VMT per employee drops 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC). As detailed in **Appendix G.1**, the Project would add 125 net trips and 1,092 net daily VMT. It is important to note, these values do not take into account credits for Project Transportation Demand Management (TDM) features, such as 30 percent of the workforce at the current facility use carpool or public transportation. Furthermore, even without

<sup>70</sup> Los Angeles Department of Transportation (LADOT). Transportation Assessment Guidelines. July 2019.

taking into account credits from TDM features, the Project would not exceed the Harbor Area Planning Commission (APC) household VMT threshold of 9.2 and work VMT threshold of 12.3. As such, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system and impacts would be less than significant.

**b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less than Significant Impact.** CEQA Guidelines section 15064.3, subdivision (b) states that land use projects that indicate 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, as is the Project, should be presumed to cause a less than significant transportation impact. Pursuant to CEQA Guidelines section 15064.3(b)(1), Projects that decrease VMT in the Project area compared to existing conditions should be presumed to have a less than significant transportation impact.

CEQA Guidelines section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact.

The significance of the Project's impact is measured against the VMT thresholds established in LADOT's TAG. As explained previously, the expansion would result in 125 net daily trips including 1,092 net daily VMT. The proposed Project is projected to be below the Household VMT per capita and Work VMT per employee thresholds identified above. As such, the proposed Project is not anticipated to cause a significant VMT impact based on the City's VMT criteria for the Central APC area. Impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur if a project includes a new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project site access or other features were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features and the proposed Project is compatible with existing uses. The Project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. As explained previously, the Project site currently provides vehicular and pedestrian access through the Coil Avenue security gate on the southwest corner of the property. The main path of access surrounding the facility is by driving along the south and west side of the facility. There are no active vehicle entrances or exits on the west side of facility. There are two (2) access gates to and from Drumm Avenue, however these gates are restricted for use by only the Los Angeles Fire Department (LAFD). The overall general circulation will remain unchanged following the expansion. Therefore, Project's driveways would continue to conform to the City's design standards and provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Impacts would be less than significant, and no mitigation measures are required.

#### **d. Result in inadequate emergency access?**

**Less than Significant Impact.** A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses. The nearest primary emergency route is Pacific Coast Highway, approximately 0.25 miles south of the Project site. Alameda Street is adjacent to the Project site on the east and serves as a secondary emergency route. As mentioned previously, there are two (2) access gates to and from Drumm Avenue, however these gates are restricted for use by only the LAFD. The overall general circulation will remain unchanged following the expansion. Development of the Project site would require temporary and/or partial street and sidewalk closures due to construction activities as the proposed Project includes expansion of the current facility. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would be less than significant.

### **Cumulative Impacts**

The TAG requires that the proposed Project be reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy or ordinance. As discussed under Threshold "A," the proposed Project would not exceed the Harbor APC household and work VMT thresholds, and the proposed Project would operate in conformance with and would not conflict with the City's *General Plan*, transportation plans, policies, programs and ordinances.

Development of the proposed Project in conjunction with any future related projects may result in an intensification of existing traffic in an already urbanized area of Los Angeles. Future related projects would also be subject to the LADOT approval process, including CEQA review. Additionally, potential related projects would incorporate any mitigation measures necessary to reduce potential traffic impacts, such that no significant traffic impacts would occur, should a significant project-related and/or cumulative impact be identified. Thus, the proposed Project would not contribute to a significant cumulative transportation impact when considered with related projects.

## XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 Resource 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"/>

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

**Less than Significant Impact.** Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC §21074, as part of CEQA. 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. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. An informational letter was mailed to a total of 11 Tribes known to have resources in this area, on April 3, 2023 describing the Project and requesting any information regarding resources that may

exist on or near the Project site. On April 13, 2023, one tribal response was received from the Gabrieleño Band of Mission Indians- Kizh Nation who requested a consultation. The consultation began on May 2, 2023 via email, when documentation was submitted with the request to condition for monitoring during construction in the event anything related to tribal resources is discovered during construction. On February 25, 2025, the City emailed the Gabrieleño Band of Mission Indians- Kizh requesting additional information. On March 6, 2025 the Kizh Nation resubmitted the same documentation and same condition.

At the conclusion of the consultation, the Department of City Planning issued a letter dated March 26, 2025, concluding that mutual agreement cannot be reached for purposes of AB 52, and that no substantial evidence exists to support a conclusion that this project may cause a significant impact on tribal cultural resources, therefore the City has no basis under CEQA to impose any related mitigation measures.

A Sacred Lands File Search (“SLF”) was conducted through the Native American Heritage Commission (“NAHC”) which confirmed negative results in correspondence dated March 6, 2025 (refer to **Appendix H**).

As mentioned in Section V: *Cultural Resources* of this ND, a California Historical Resources Information (“CHRIS”) record search was conducted on August 15, 2023 to identify any known cultural resources in the immediate vicinity of the Project area. A records review was prepared by Meridian Consultants dated August 29, 2023. The search concluded no previously documented cultural resources have been previously documented within the Project area.

The Project site is not found to be a potential historic resource in HistoricPlaces LA, SurveyLA or other City parcel reports or references. As such, implementation of the Project would not alter any of the physical characteristics of the nearby historic resources, including through construction activities, vibration from off-road equipment, and operation of the proposed Project. Because the Project site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the Regulatory Compliance Measures for archeological resources, paleontological resources, and human remains would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be avoided or reduced to less-than-significant levels. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

- b. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less than Significant Impact.** Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. As discussed under Finding (a), no responses were received within the 30-day notification period.

As noted previously, the depth and extent of grading and excavation would be limited. As such, unearthing of subsurface cultural resources would be limited. In the event subsurface cultural resources are unearthed, the Project would comply with City regulations on how artifacts found during construction must be handled. As such the potential for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe would be less than significant and no mitigation measures are required.

### **Cumulative Impacts**

The proposed Project's adherence to the regulatory compliance measures for archaeological, paleontological resources and human remains would ensure any found resources, deposits or remains are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Furthermore, impacts related to tribal cultural resources are site-specific and are assessed on a site by-site basis through the AB 52 Consultation process. The City requires applicants to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. Therefore, because Tribal Cultural impacts are site specific, cumulative impacts related to Tribal Cultural Resources would be less than significant.

## XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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"/>
<b>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</b>				

**Less than Significant Impact.** A significant impact would occur if the proposed Project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project site would be exceeded. Water in the City is supplied by the LADWP. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's water service area. The LAAFP has



the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 240–260 mgd as of March 2018.<sup>71</sup> Therefore, the LAAFP has a remaining capacity of approximately 340-360 mgd, depending on the season.

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.<sup>72</sup> This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

The Project site is in a developed, urbanized portion of the City that is served by existing water and sewer mains. As shown in **Table 4.19-1: Estimated Water Demand**, it is estimated that proposed Project would have a net increase in daily water demand of 1,679 gallons, or 1.9 acre-feet per year (afy). The proposed expansion would require less than 0.01 percent of the remaining capacity of the LAAFP (which currently operates at 60 percent capacity). Therefore, the proposed Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Furthermore, the Project applicant would be required to implement applicable California Green Building Code requirements that would further reduce water demand.

**TABLE 4.19-1: ESTIMATED WATER DEMAND**

Land Use	Quantity	Demand Factor (gpd/unit) <sup>a</sup>	Daily Demand (gpd)	Annual Demand (afy)
<b>Proposed</b>				
Proposed Expansion	281,899 square feet	36 gpd/1,000 Gr SF	7,831 gpd	8.8
<b>Current</b>				
Existing Warehouse	221,496 square feet	36 gpd/1,000 Gr SF	6,152 gpd	6.9
<b>Net Increase</b>	—	—	<b>1,679 gpd</b>	<b>1.9</b>

Note: afy = acre-feet per year; gpd = gallons per day; Gr SF = gross square feet.

<sup>a</sup> 120 percent sewage generation loading factor; City of Los Angeles, Bureau of Sanitation, Sewage Generation Factors, April 2012.

As shown in **Table 4.19-2: Estimated Sewage Generation**, it is estimated that the proposed expansion would generate approximately 8,896 gpd (10.0 afy) of wastewater, resulting in a net increase of 2,014 gpd (2.2 afy) when compared to the existing warehouse. The proposed Project would require approximately less than 0.01 percent of the remaining capacity of the HTP, which currently operates with 88 mgd of remaining capacity.

<sup>71</sup> LAAFP Control Room Operator. Phone Conversation with Jeff Shaffen. March 21, 2018.

<sup>72</sup> City of Los Angeles Department of Public Works Bureau of Sanitation. Wastewater System Fact Sheet. 2014.

**TABLE 4.19-2: ESTIMATED SEWAGE GENERATION**

Land Use	Quantity	Demand Factor <sup>a</sup> (gpd/unit)	Daily Generation (gpd)	Annual Demand (afy)
<b>Proposed</b>				
Proposed Expansion	281,899 square feet	30 gpd/ 1,000 Gr SF	9,397 gpd	10.
<b>Current</b>				
Existing Warehouse	221,496 square feet	30 gpd/ 1,000 Gr SF	7,383 gpd	8.3
<b>Net Increase</b>			<b>2,014 gpd</b>	<b>2.2</b>

*Note: afy = acre-feet per year; gpd = gallons per day.*

<sup>a</sup> *City of Los Angeles, Bureau of Sanitation, Sewage Generation Factors, April 2012.*

The Project site is located in an urbanized location that is currently served by stormwater infrastructure. The Project site would continue to be predominantly impervious surface. In addition, the Project would be required to demonstrate compliance with the City’s Low Impact Development (LID) Ordinance standards. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As such, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

The Project site is located in a developed, urbanized setting that is served by existing electric power, natural gas and telecommunications services. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical or telecommunications services. No new connections would be established for the Project. No substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the Project site that would need to be relocated to accommodate the Project. Impacts would be less than significant, and no mitigation measures are required.

**b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less than Significant Impact.** A significant impact would occur if the proposed Project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. The proposed Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services.

The LADWP adopted a new Urban Water Management Plan (UWMP) in May 2020,<sup>73</sup> which serves as a master plan for water supply and resources management consistent with LADWP goals and policy objectives. The UWMP forecasts expected cumulative growth in water demand and identifies matching water supplies. According to the UWMP, the total demand for water was 487,591 afy for 2020. The total forecasted demand for water during a single dry season would be 674,700 afy for 2025, and the forecasted post-conservation demand for water during a single dry season would be 509,500 afy for 2025.<sup>74</sup> The UWMP projects adequate water supplies to meet cumulative forecasted demand through 2045, the planning horizon for the current UWMP. The Project demand of 8.3 afy would be less than 0.01 percent of the available capacity during a single dry year in 2025. The Project is considered to be within the growth projections used by the LADWP in forecasting cumulative future demand. As such, it is expected that LADWP has sufficient water supplies available to serve the proposed Project.<sup>75</sup> The Project applicant would be required to adhere to current standards, including the California Green Building Code, that would reduce demand on local water supplies. Thus, LADWP has sufficient water supplies available to serve the proposed Project from existing entitlements and resources, and no new or expanded entitlements are needed. As such, impacts would be less than significant, and no mitigation measures are required.

**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?**

**Less than Significant Impact.** Wastewater flows from the Project site would be conveyed to the HTP through existing sewer lines. The HTP is managed by the City of Los Angeles. The City has adopted an Integrated Resources Plan (IRP) that includes a Wastewater Facilities Plan addressing forecasted cumulative system demand and identifying sufficient capacity to meet that demand.<sup>76</sup> Operation of the proposed Project would result in an increase in the amount of wastewater generated on the Project site compared to existing conditions. As stated previously, the HTP has capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. Furthermore, the Project is considered to be within the growth projections used in forecasting cumulative future demand. As such, impacts would be less than significant and no mitigation measures are required.

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<sup>73</sup> City of Los Angeles Department of Water and Power. City of Los Angeles Urban Water Management Plan 2020. Accessed September 2024. <https://www.ladwp.com>.

<sup>74</sup> City of Los Angeles Department of Water and Power. City of Los Angeles Urban Water Management Plan 2020. Accessed September 2024. <https://www.ladwp.com>.

<sup>75</sup> City of Los Angeles Department of Water and Power. City of Los Angeles Urban Water Management Plan 2020. Accessed September 2024. <https://www.ladwp.com>.

<sup>76</sup> City of Los Angeles Department of Public Works Bureau of Sanitation. City of Los Angeles Integrated Resources Plan Executive Summary. December 2006.

**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?**

**Less than Significant Impact.** Solid waste generated within the City is disposed of at landfill facilities throughout Los Angeles County. The solid waste is collected and taken to Athens’s recycling facility, the City of Industry Materials Recovery Facility. Food waste is processed and transported to Athens’s compost facility in Victorville, American Organics. Remaining waste that cannot be recycled is disposed on a regular basis to one of four facilities within Los Angeles County.

The County Department of Public Works prepares an annual report on solid waste management within the County to help meet long-term needs and maintain adequate capacity. As described in the County’s most recent report, landfills within Los Angeles County have a remaining capacity of more than 103 million tons and no shortfall in permitted solid waste disposal capacity is anticipated within the County under forecasted growth and ongoing municipal efforts at waste reduction and diversion.<sup>77</sup> As shown in **Table 4.19-3: Expected Operational Solid Waste Generation**, the proposed expansion would generate 180 pounds of solid waste per day, resulting in a net increase of 30 pounds of solid waste per day. This estimate is conservative because it does not factor in any recycling or waste diversion programs. The amount of solid waste generated by the proposed Project would be within the available capacities at area landfills.

**TABLE 4.19-3: ESTIMATED OPERATIONAL SOLID WASTE GENERATION**

Type of Use	Size	Waste Generation Rate <sup>a</sup> (lb./unit/day)	Total Solid Waste Generated (lb./day)
<b>Proposed</b>			
Proposed Expansion	180 Employees	1 lb./employee/day	180 lb./day
<b>Current</b>			
Existing Warehouse	150 Employees	1 lb./employee/day	150 lb./day
<b>Net Increase</b>			<b>30 lb./day</b>

Notes: lb. = pounds; sf =square feet.

<sup>a</sup> City of Los Angeles, Bureau of Sanitation, *Solid Waste Generation (1981)*. Waste generation includes all materials discarded, whether they are later recycled or disposed of in a landfill.

In addition, the County addresses forecasted cumulative landfill demand and capacity through the preparation of annual County of Los Angeles Integrated Waste Management Plan (CoIWMP) reports. The current CoIWMP has identified sufficient capacity to meet the cumulative forecasted landfill needs within the County. The Project is considered to be within the growth projections

<sup>77</sup> Los Angeles County Department of Public Works. “2020 Annual Report.” Los Angeles Countywide Integrated Waste Management Plan. October 2021.

used in forecasting cumulative demand. The preparation of each annual CoIWMP report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. As such, construction and operation of the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Impacts would be less than significant, and no mitigation measures are required.

**e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less than Significant Impact.** As under current conditions, solid waste generated on site would be disposed of in accordance with all applicable federal, State, and local regulations related to solid waste. In addition, the Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939) which was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000 and 70 percent by the year 2020. As such, compliance with local regulations, impacts would be less than significant, and no mitigation measures are required.

**Cumulative Impacts**

The proposed Project would not result in significant impacts to utilities and service systems. Future related projects' evaluation of infrastructure plans would ensure that there is adequate public utility services and resources available to serve both individual development projects and cumulative growth in the region. Each individual development project would be subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to development projects without interrupting or degrading services to existing customers. Further, development projects would be subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because the comprehensive utility and service planning and coordination activities described in the previous discussion would ensure that new development projects do not disrupt or degrade the provision of utility services, cumulatively considerable impacts to utilities and service systems would not occur.

## XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:</i>				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

**No Impact.** Wildland fire protection in California is the responsibility of either the local government, State, or the federal government. State Responsibility Areas (SRA) are the areas in the State where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government (CAL FIRE 2019a). LAFD provides fire protection and emergency medical services to the County. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. Fire Hazard Severity

Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA.

The Project site is not in or near an SRA or LRA or lands classified as FHSZ.<sup>78</sup> The Project site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The nearest primary emergency route is Pacific Coast Highway, approximately 0.25 miles south of the Project site. Alameda Street is adjacent to the Project site on the east and serves as a secondary emergency route. The proposed Project would be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Thus, the proposed Project would not substantially impair an adopted emergency response or evacuation plan. No impact would occur and no mitigation measures are required.

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

**No Impact.** As demonstrated previously, the Project site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire to protect occupants. Therefore, no impact would occur no mitigation measures are required.

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

**No Impact.** As demonstrated previously, the Project site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The Project would not require the installation or maintenance of any infrastructure or utility improvements or additions. As such, impacts related to infrastructure modifications increasing fire risk would not result in any impacts and no mitigation measures are required.

**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?**

**No Impact.** As demonstrated previously, the Project site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. Development of the Project site would not exacerbate wildfire hazards on site. The Project is not located near a potential flooding, landslide area, or would result in potential drainage changes. No impacts would occur and not mitigation measures are required.

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<sup>78</sup> CalFire. Fire Hazard Severity Zones. Accessed September 2024. [https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones#:~:text=Local%20Responsibility%20Areas%20\(LRA\)%20are,by%20CAL%20FIRE%20under%20contract.](https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones#:~:text=Local%20Responsibility%20Areas%20(LRA)%20are,by%20CAL%20FIRE%20under%20contract.)

## **Cumulative Impacts**

Both the proposed Project and any future related projects would be located within a developed, urban setting and would not be located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone. Thus, no cumulative impacts would occur.



## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<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 a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** A significant impact could occur only if the Project would have an identified potentially significant impact for any of the environmental topics addressed in this Initial Study . However, as described previously, the Project would not result in any significant impacts. The Project is located in a densely populated urban area and would have no significant impacts with respect to biological and cultural resources. The proposed Project does not have the potential to significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, or threaten to eliminate a plant animal community. The Project is located in a developed, urbanized area and will not disrupt or hinder any known habitats. Impacts would be less than significant and no mitigation measures are required.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Less Than Significant Impact.** A significant impact may occur if the proposed Project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. There are no related projects within a half mile (1/2) radius of the Project site.

As such, the cumulative impacts to which the proposed Project would contribute would be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if the proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Upon implementation of the Regulatory Compliance Measures applicable and compliance with existing regulations, any potentially significant impacts would be reduced to less than significant levels.

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