REVISED INITIAL STUDY
&
MITIGATED NEGATIVE DECLARATION

LAPD EVIDENCE WAREHOUSE
4671 WORTH STREET
LOS ANGELES, CALIFORNIA 90063

LEAD AGENCY:
CITY OF LOS ANGELES
PUBLIC WORKS, BUREAU OF ENGINEERING
1149 SOUTH BROADWAY
LOS ANGELES, CALIFORNIA 90015

REPORT PREPARED BY:
BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 SOUTH HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745

OCTOBER, 2018

LACY 012
CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

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

COUNCIL DISTRICT 14

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

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

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

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

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:
Marc Blodgett, 2211 South Hacienda Boulevard, Suite 107 Hacienda Heights, California 91745

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

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

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

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: Talmage Jordan
Environmental Specialist II
ADDRESS: 1149 S. Broadway, Suite 600, MS 939
Los Angeles, CA 90015

TELEPHONE NUMBER: (213) 485-5754

SIGNATURE (Official): Maria Martin, Environmental Affairs Officer
Environmental Management Group

DATE: 11/1/18
1. INTRODUCTION

1.1. PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project’s approval even if it leads to environmental damage. The Bureau of Engineering Environmental Management Division (EMD) has determined the proposed project is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study (IS) is required.

An IS 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 (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

The IS/MND contained herein have 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 July 31, 2002).

1.2. DOCUMENT FORMAT

This Mitigated Negative Declaration was circulated for a 20-day public review and comment period which began on September 6, 2018. Minor revisions and changes to the IS/MND were made to reflect the input received. The City recirculated a Revised Mitigated Negative Declaration and Initial Study for a 20-day review period from October 11th, 2018 until October 31st, 2018. These changes are identified using the following conventions: additional or new material is noted using underlining while text that has been
This MND is organized into eight nine sections as follows:

- **Section 1. Introduction**: provides an overview of the project and the CEQA environmental documentation process.

- **Section 2. Project Description**: provides a description of the project location, project background, project components, and proposed construction and operation.

- **Section 3. Existing Environment**: provides a description of the existing environmental setting with focus on features of the environment, which could potentially affect the proposed project or be affected by the proposed project.

- **Section 4. Environmental Effects/Initial Study Checklist**: presents the City’s Checklist for all impact areas and mandatory findings of significance. Includes discussion and identifies applicable mitigation measures.

- **Section 5. Mitigation Measures**: provides the mitigation measures that would be implemented to ensure that potential adverse impacts of the proposed project would be reduced to a less than significant level.

- **Section 6. Preparation and Consultation**: provides a list of key personnel involved in the preparation of this report and key personnel consulted.

- **Section 7. Determination – Recommended Environmental Documentation**: provides the recommended environmental documentation for the proposed project; and,

- **Section 8. References**: provides a list of reference materials used during the preparation of this report.

- **Section 9. Comments and Response to Comments**: provides a list of comments received during the public review period. This section also includes responses to the comments received.

### 1.3. CEQA Process

Once the adoption of a ND (or MND) has been proposed, a public comment period opens for no less than twenty (20) days or thirty (30) days if there is state agency involvement. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the initial study and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.
After the close of the public review period, the Board of Public Works considers the ND or MND, together with any comments received during the public review process, and makes a recommendation to the City Council on whether or not to approve the project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the ND or MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project. During the project approval process, persons and/or agencies may address either the Board of Public Works or the City Council regarding the project. Public notification of agenda items for the Board of Public Works, Council committees, and City Council is posted 72 hours prior to the public meeting. The Board of Public Works Agenda is available via the internet at http://www.bpw.lacity.org/. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling 213/978-1047, 213/978-1048 or TDD/TTY 213/978-1055; or via the internet at http://www.lacity.org/city-government/elected-official-offices/city-council-and-committeemeeting.

If the project is approved, the City will file a Notice of Determination with the County Clerk within 5 days. The Notice of Determination will be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues presented to the lead agency by any person, either orally or in writing, during the public comment period.

As a covered entity under Title II of the Americans with Disabilities Act (ADA), the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.
2. PROJECT DESCRIPTION

2.1 PROJECT PURPOSE AND PURPOSE OF THE INITIAL STUDY

The project involves the subdivision of a 6.6-acre lot located at the northwest corner of the Marianna Avenue and Worth Street. This lot will be subdivided to accommodate two projects. However, this Initial Study/Mitigated Negative Declaration (IS/MND) will only analyze the subdivision of the site and the construction of an approximately 80,000 square-foot warehouse within one of the two newly created parcels. Development of the second parcel is not being analyzed as part of this project because doing so would be speculative at this time. No particular development is planned or foreseeable for the second parcel at this time and any future development of the second parcel, if developed, would need to undergo a separate review when its use is known. A lead agency is generally not permitted to segment or piecemeal a project into smaller components if the purpose of this piecemealing is to avoid the full disclosure of environmental impacts. Again, the requirement arises from the definition of a CEQA project which includes the phrase "...whole of the action." This phrase has been interpreted by the California Supreme Court to mean that it is generally inappropriate to divide a larger project into smaller segments so as to avoid the preparation of an environmental impact report (EIR). It is important to note that the CEQA concept of a project refers to the underlying activity being approved by an agency, not just the government permits necessary to implement the project. Therefore, a lead agency may not treat each separate permit or approval as a separate project for purposes of evaluating environmental impacts. The rule against segmenting does not mean that every activity related to a proposed project’s implementation must be included in a single CEQA document. Rather, the California Supreme Court held that related actions only had to be included in a CEQA document when they were reasonably foreseeable, but not when they were remote and speculative.

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

As part of the project, the Applicant, Camfield Partners L.L.C, c/o Mr. Ken Jackson, CEO, 8895 Research Drive, Irvine, California 92618) will be entering into a Purchase and Sale Agreement with the City in order to facilitate the construction of the project and the transfer of ownership of the property to the City’s Police Department. The Purchase and Sale Agreement will be discussed in further detail in subsection 2.5.

As part of the proposed project’s environmental review, the City of Los Angeles (the City), as the CEQA Lead Agency, authorized the preparation of this Initial Study. Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Los Angeles, in its capacity as the Lead Agency. The primary purpose of CEQA is to ensure that decision-makers and the public understand the

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environmental impacts of the proposed project and that decision-makers have considered such impacts before considering approval of the project. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

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

The City also determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and the Notice of Intent to Adopt a Mitigated Negative Declaration will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 20-day public review period will be provided to allow these agencies and other interested parties to comment on the proposed project and the findings of this Initial Study. Questions and/or comments should be submitted to the following individual:

Maria Martin, Environmental Management Group Manager  
Los Angeles Department of Public Works Bureau of Engineering  
1149 South Broadway, Suite 600  
Los Angeles, California 90015  
maria.martin@lacity.org

### 2.2 PROJECT LOCATION

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

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2. Quantum GIS. Shapefile layers for Los Angeles County and the City of Los Angeles.
3. Ibid.
4. Ibid.
A regional location map is provided in Exhibit 2-1 and a map of the City is provided in Exhibit 2-2. The project site is located at the northwest corner of the Worth Street and Marianna Avenue intersection. The site’s legal address is 4671 Worth Street. The corresponding Assessor Parcel Numbers (APNs) include 5223-002-007 and 5223-002-015. Major roadways in the vicinity of the project site include Valley Boulevard, located 0.22 miles to the north; Soto Street, located 0.96 miles to the west; and Eastern Avenue, located 308 feet to the southeast. Regional access to the project site is provided ramp connections to the San Bernardino Freeway (1-10), located 1.32 miles to the southwest along Soto Street. A local map is provided in Exhibit 2-3.

2.3 Physical Characteristics of the Proposed Project

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

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

- **LAPD Evidence Warehouse and Office.** The new warehouse will have a total floor area of approximately 80,000 square feet, a width (east-west) of 416 feet and a depth (north-south) of 203 feet. The building will also have a total height of 44 feet, a lot coverage of 54 percent, and a Floor Area Ratio (FAR) of 0.56 to 1.0. The warehouse will include multiple rooms each with a dedicated purpose. A 10,030 square-foot portion of the warehouse will be reserved for commercial auto theft (CATS). Other various amenities include a 2,500 square-foot break down room; a 4,300 square-foot sorting room; a 1,206 square-foot freezer that will be used to store organic evidence; a 5,025 square feet climate controlled room; a 2,600 square-foot auction staging room; and a 744 square-foot lobby, among others. Additionally, the Applicant will provide 46 bicycle racks with capacity for a total of 414 bicycles. These 46 bicycle racks will be located within the northern portion of the warehouse building. Furthermore, 10,086 square feet of office mezzanine will be included.

- **Parking and Access.** A total of 237 parking spaces will be striped. Of the total number of spaces that will be provided, 16 will be located south of the warehouse building, 20 spaces will be located within the warehouse, and 201 spaces will be located on the roof. A ramp leading up to the rooftop parking area will be installed along the northeast corner of the building along the west side of Marianna Avenue. The Applicant will also provide three dock high doors along the building's south facing elevation.

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2.6. **DISCRETIONARY ACTIONS AND OTHER AGENCIES WHOSE APPROVAL IS REQUIRED (PERMITS, FEES, LICENSES, AND TRIBAL CONSULTATION)**

**DISCRETIONARY ACTIONS:** A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Los Angeles) that calls for an exercise of judgment in deciding whether to approve a project. Anticipated approvals or permits for the proposed project include, but are not limited to, the following:

- City of Los Angeles City Council adoption of the Mitigated Negative Declaration (MND).

- City of Los Angeles City Council, execution of a purchase and sale agreement regarding the development by and conveyance of the property from the Applicant to the City of Los Angeles for the City of Los Angeles’s use and operation of the facilities on the property;

- City of Los Angeles Department of City Planning, Tentative Parcel Map to realign the site’s existing parcel boundaries (the site consists of two parcels);

- City of Los Angeles Department of City Planning, Site Plan Review for a building larger than 50,000 square feet;

- City of Los Angeles Board of Public Works Commission, Tree Removal Permit to remove street trees; and,

- Acceptance of the property and facilities after completion by the City.

**OTHER AGENCIES WHOSE APPROVAL IS REQUIRED:** The project would require various ministerial approvals such as building permits, grading permits, business licenses, occupancy permits, and a permit to connect to the City’s water and sewer lines. The project would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board.

**NATIVE AMERICAN AND TRIBAL CONSULTATION:** California Native American tribes traditionally and culturally affiliated with the project area that requested consultation pursuant to Public Resources Code section 21080.3.1 has occurred. Formal Native American Consultation Pursuant to AB-52 has been initiated and contact with the Native American Heritage Commission (NAHC) has been completed.
<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SECTION 4.1 AESTHETIC IMPACTS. Would the project:</strong></td>
<td></td>
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<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
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<td>X</td>
<td></td>
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<tr>
<td>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td></td>
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<td>X</td>
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<tr>
<td>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
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<td>X</td>
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<tr>
<td>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td></td>
<td></td>
<td>X</td>
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<tr>
<td><strong>SECTION 4.2 AGRICULTURE &amp; FORESTRY RESOURCES IMPACTS. Would the project:</strong></td>
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<tr>
<td>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?</td>
<td></td>
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<td>X</td>
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<tr>
<td>b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?</td>
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<td>X</td>
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<tr>
<td>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</td>
<td></td>
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<td>X</td>
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<tr>
<td>d) Result in the loss of forest land or conversion of forest land to a non-forest use?</td>
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<td>X</td>
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<tr>
<td>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?</td>
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<td>X</td>
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<td><strong>SECTION 4.3 AIR QUALITY IMPACTS. Would the project:</strong></td>
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<tr>
<td>a) Conflict with or obstruct implementation of the applicable air quality plan?</td>
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<td>X</td>
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<tr>
<td>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
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<td>X</td>
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<tr>
<td>c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</td>
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<td>X</td>
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## Table 4-1
Summary (Initial Study Checklist)

<table>
<thead>
<tr>
<th>Environmental Issue Area Examined</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>d) Expose sensitive receptors to substantial pollutant concentrations?</td>
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<td>X</td>
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<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
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<td>X</td>
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</table>

### SECTION 4.4 BIOLOGICAL RESOURCES IMPACTS.
Would the project:

| 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? | X |
| 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? | X |
| c) Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | X |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? | X |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | X |
| 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? | X |

### SECTION 4.5 CULTURAL RESOURCES IMPACTS.
Would the project:

| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | X |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | X |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | X |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | X |
4.1 AESTHETICS

4.1.1 THRESHOLDS OF SIGNIFICANCE

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

• Have a substantial adverse effect on a scenic vista;

• Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

• Substantially degrade the existing visual character or quality of the site and its surroundings;

or,

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

4.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Scenic vistas in the area include views of the San Gabriel Mountains (located approximately ten miles to the north) and of Downtown Los Angeles (located approximately four miles to the southwest). The implementation of the proposed project will not impact scenic views of the San Gabriel Mountains or Downtown Los Angeles because views of the aforementioned vistas are obstructed by the existing development. These conclusions are supported by the field survey that was conducted for the project.14 Views of Downtown Los Angeles looking west from the residential development located along the east side of Marianna Avenue will remain intact since these units consist of three stories and are situated at a higher elevation than the project site. As a result, no impacts will occur.

B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? • No Impact.

According to the California Department of Transportation (Caltrans), neither Worth Street nor Marianna Avenue are designated scenic highways.15 The closest scenic highway to the project site is Angeles Crest Highway (SR-2), located 11 miles to the north of the project site. In addition, the vegetation present on-site consists of grass and ornamental species and the project site does not contain any scenic rock outcroppings. As stated previously, the project will require the removal and replacement of all of the street trees located adjacent to the project site along the west side of Marianna Avenue. These trees consist of species most commonly planted as ornamental landscaping and possess minimal scenic value due to their abundance, age, and unmaintained appearance. Lastly, the project site is undeveloped and does not contain any buildings listed in the State or National registrar (refer to

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

Section 4.5. As a result, no impacts will occur.

C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? • Less than Significant Impact.

The project site is presently undeveloped and is covered over in unmaintained ruderal vegetation. There are mature trees located adjacent to the project site’s eastern property line along the west side of Marianna Avenue. These trees are unmaintained and consist of common ornamental species. The project’s implementation will require the removal and replacement of these street trees with new drought tolerant species, which will improve the appearance of the street and surrounding area. Once constructed, the proposed project will improve the quality of the site by introducing new development characterized by modern architecture, façade treatments, and a neutral color scheme (grey and white walls and blue glazed windows). In addition, the size and mass of the proposed development will be consistent with the other warehouses located in the site’s vicinity. The project’s size and mass is also similar in scale to the nearby multiple-family residential development, which totals three stories in height. As a result, less than significant impacts will occur.

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

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as light trespass which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. The apartment complex located along the east side of Marianna Avenue is the closest sensitive receptor to the project site.16 The predominant source of light impacts will be related to the surface parking lot and building lighting. Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or a driver’s vision. The exterior façade would consist of non-reflective materials, such as concrete. In addition, the windows would be comprised of blue reflective glazing, which reduces glare over other transparent surfaces. As a result, no daytime glare-related impacts are anticipated. Nighttime glare and illumination has the potential to result in potentially significant impacts to sensitive receptors. Many sources of light contribute to the ambient nighttime lighting conditions. These sources of nighttime light include street lights, security lighting, wall packs, and vehicular headlights. The outdoor lighting will be controlled by timers. In addition, all lighting must be installed according to these provisions outlined in the City’s Municipal Code:

- *Chapter 9, Article 3, Sec. 93.0117*: No exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

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16 Blodgett Bayliss Environmental Planning. *Site survey.* Survey was conducted on May 17, 2018.
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation.

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

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

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

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

There are multiple mature trees located along the Marianna Avenue right-of-way. All of the trees are of the same species (eucalyptus trees), which are not a protected species. These street trees will be removed and replaced to accommodate the proposed project. Even though these trees are not "protected trees," their removal is contingent upon the attainment of a Tree Removal Permit and the trees will be replaced following the construction of the facilities during the landscaping and finishing phase, pursuant to conditions in said permit. The removal of the existing eucalyptus trees is not considered to be a significant impact that requires further mitigation because the project Applicant will replace these trees on a 2 to 1 ratio pursuant to the conditions outlined in the Permit. Furthermore, these trees will consist of drought tolerant species.

The removal of these trees may have the potential to impact nesting species that may reside within their canopy. To ensure that the potential tree removal does not adversely impact any avian species living in the trees, the following mitigation is required:

- If clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before the construction activities commence. The qualified biologist shall survey the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction

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survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.

The above mitigation would reduce the impact to levels that are less than significant by ensuring there are no nesting birds present on-site should construction commence between the months of February and August.

F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? • No Impact.

The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The project site is not governed by a Natural Community Conservation Plan. Moreover, the closest Significant Ecological Area (SEA) to the project site is the Verdugo Mountains Significant Ecological Area (SEA #40), located approximately nine miles northwest from the project site. The construction and operation of the proposed project will not affect the Verdugo Mountains SEA.

The Los Angeles River is currently the focus of a revitalization effort lead by the City of Los Angeles. The City of Los Angeles intends to focus on the 32-mile portion of the river that flows from Owensmouth Avenue, located in the San Fernando Valley, to the northern border of the City of Vernon. The project site is located 2.60 miles east of the Los Angeles River and the project's construction and subsequent operation will not affect efforts to revitalize the Los Angeles River. Therefore, no impacts will occur.

4.4.3 Mitigation Measures

The analysis of biological resources impacts indicated that the proposed project may have the potential to impact nesting avian species. The project's implementation will require the removal of the mature street trees located adjacent to the project site's eastern property line along the west side of Marianna Avenue. Avian species may be present within these trees during the migratory bird nesting season. Therefore, the following mitigation is required:

Mitigation Measure No. 2 (Biological Resources). If clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before the construction activities commence. The qualified biologist shall survey the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are
not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. The emissions generated by the proposed project will be less than the thresholds of significance established for CO₂ (refer to Table 4-5). As a result, no impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are anticipated.

The proposed project will be in accordance with the City's Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version address additional items such as clean air vehicles, increased requirements for electric vehicles charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as State law provides methods for local enhancements.

In addition, the project will be LEED BD+C: New Construction certified. The proposed project will include the installation and use of energy efficient lighting. This new lighting will also be controlled by timers to limit wasteful energy consumption. Furthermore, the project will provide four Level II electric vehicle chargers and roof mounts for future solar panels. Lastly, the project is an "infill development" and is seen as an important strategy in reducing regional GHG emissions. Infill development is a key priority of SCAG, whose goal is to implement land use policies that encourage more density and redevelopment of underutilized urban parcels located within transit priority areas (according to Zoning Information and Map Access System [ZIMAS], the project site is located within a transit priority area). Furthermore, SCAG is embracing recent innovations in mobility as part of their 2016 RTP, including the use of alternative fueled vehicles and establishing a network of electric vehicle charging stations. The 2016 SCAG RTP includes the following recommendations for reducing GHG emissions:

- **Use energy and fuel efficient vehicles and equipment.** The proposed project will include the installation and use of energy efficient lighting. This new lighting will also be controlled by timers to limit wasteful energy consumption. Furthermore, the project will provide four Level II electric vehicle chargers.

- **Incorporate design measures to reduce energy consumption and increase use of renewable energy.** The project will include roof mounts for future solar panels.

- **Plant shade trees in or near construction projects where feasible.** The project’s implementation will require the removal of the eucalyptus trees located along the west side of Marianna Avenue. These trees will be replaced at a 2:1 ratio.