DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: November 10, 2016
Time: After 8:30 A.M.
Place: Los Angeles City Hall
Board of Public Works Hearing Room
200 North Spring Street, Room 350
Los Angeles, CA 90012

Public Hearing: July 6, 2016
Appeal Status: Appealable to City Council.
Expiration Date: November 10, 2016
Multiple Approval: Yes

Case Nos.:	AA-2012-919-PMLA DIR-2013-887-SPR
CEQA No.:	ENV-2012-920-EIR SCH No. 2014061030
Incidental Cases:	N/A
Related Cases:	N/A
Council No.:	9 - Price
Plan Area:	South Central
Specific Plan:	South Los Angeles Alcohol Sales
Certified NC:	South Central
GPLU:	Light Manufacturing
Zone:	M2-2
Applicant/ Representative:	CEG Construction, Barry Segal (Segal + REA Architecture)
Appellant:	Mr. Tezozomoc, South Central Farmers

PROJECT LOCATION: 4051 Alameda Street

PROPOSED PROJECT: The proposed project involves the subdivision of one 562,314 net square-foot parcel into four lots (Lot 1: 3.23 net acres, Lot 2: 3.23 net acres, Lot 3: 3.23 net acres, and Lot 4: 3.23 net acres) in the M2-2 Zone. The project includes the construction of four industrial buildings consisting of Building 1: 115,973 square feet and 123 parking spaces, Building 2: 133,680 square feet and 79 parking spaces, Building 3: 116,724 square feet and 96 parking spaces, and Building 4: 113,743 square feet and 106 parking spaces. The applicant is requesting the merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place.

APPEAL:

1. An appeal of the certification of the **Environmental Impact Report**, findings, Statement of Overriding Considerations, and accompanying mitigation measures and Mitigation Monitoring Program for ENV-2012-920-EIR, SCH No. 2014061030;

2. Pursuant to the Los Angeles Municipal Code Section 17.54, an appeal of Parcel Map AA-2012-919-PMLA to permit the subdivision of one 565,314 net square-foot parcel into four lots (Lot 1: 3.23 net acres, Lot 2: 3.23 net acres, Lot 3: 3.23 net acres, and Lot 4: 3.23 net acres) in the M2-2 Zone. As part of the Parcel Map, the applicant is requesting the merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place; and

3. Pursuant to LAMC Section 16.05, an appeal of Site Plan Review for the construction, use and maintenance of four new industrial buildings consisting of: Building 1: 115,973 square feet and 124 parking spaces, Building 2: 133,680 square feet and

79 parking spaces, Building 3: 116,724 square feet and 96 parking spaces, and Building 4: 113,743 square feet and 106 parking spaces.

RECOMMENDED ACTIONS:

1. **Deny** the appeal of the certification of the **Environmental Impact Report**, findings, Statement of Overriding Considerations, and accompanying mitigation measures and Mitigation Monitoring Program for ENV-2012-920-EIR, SCH No. 2014061030;

2. **Deny** the appeal and **sustain** the decision of the Advisory Agency for Parcel Map AA-2012-919-PMLA to permit the subdivision of one 565,314 net square-foot parcel into four lots (Lot 1: 3.23 net acres, Lot 2: 3.23 net acres, Lot 3: 3.23 net acres, and Lot 4: 3.23 net acres) in the M2-2 Zone. As part of the Parcel Map, the applicant is requesting the merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place; and

3. **Deny** the appeal and **sustain** the decision of the Director of Planning for Site Plan Review for the construction, use and maintenance of four new industrial buildings consisting of: Building 1: 115,973 square feet and 124 parking spaces, Building 2: 133,680 square feet and 79 parking spaces, Building 3: 116,724 square feet and 96 parking spaces, and Building 4: 113,743 square feet and 106 parking spaces.

4. **Adopt** the findings of the Advisory Agency and the Director of Planning.

5. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.

6. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

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AA-2012-919-PMLA-1A
DIR-2013-887-SPR
ENV-2012-920-EIR / SCH No. 2014061030

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 525, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, 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 these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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http://planning.lacity.org/eir/4051SoAlamedaStProj/4051SoAlamedaCoverPg.html

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PROJECT ANALYSIS

Project Summary

The proposed project includes the merger and resubdivision of an existing 12.98-acre (565,798 square feet) site into four industrial lots in order to allow for the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet.

Consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- 5' street widening on Martin Luther King, Jr. Boulevard
- 8.5 street widening on the north and 12.5' street widening on the south of South Alameda Street
- 22' street widening on 41st Street

In order to allow for the proposed project, the project applicant has requested and been approved for a Preliminary Parcel Map (AA-2012-919-PMLA) and Site Plan Review (DIR-2013-887-SPR). The Advisory Agency's approval of AA-2012-919-PMLA and the Director's approval of DIR-2013-887-SPR have been appealed by Mr. Tezozomoc, on behalf of the South Central Farmers.

Background

The project site is a rectangular shaped property that totals approximately 12.9 acres, after deduction of dedication requirements. The property has a frontage on Alameda Street, Martin Luther King Jr. Boulevard, 41st Street, and Long Beach Avenue. The project is zoned M2-2 and is not located within a specific plan area. The Zone's Height District 2 is silent in regard to building height limitations, however the allowable Floor Area Ratio (FAR) is limited to 6:1. The site is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

Property History

The subject property was acquired by the City of Los Angeles through eminent domain in 1986 for the purpose of constructing a trash incinerator known as the Los Angeles City Energy Recovery ("LANCER") project. The condemnation judgment provided that the Alameda-Barbara Investment Company, which owned 11 acres of the approximately 13-acre site, would have a first right to repurchase the property should the City determine that the property was no longer needed for public use. The LANCER project was terminated due to community opposition and in 1994 the property was transferred to the City Harbor Department for $13.3 million. The Harbor Department granted a revocable permit to the Los Angeles Regional Food Bank ("the "Food Bank") to occupy and use the site as a community garden.

In late 1994, the Harbor Department began negotiations with the Libaw-Horowitz Investment Company ("Libaw-Horowitz"), the successor-in-interest to the Alameda-Barbara Investment Company, with regard to the repurchase of the property, and by October 1996, a purchase and sale agreement had been signed by Libaw-Horowitz with the understanding that the agreement would be presented to the Board of Harbor Commissioners and City Council for consideration. In 2001, the Harbor Department informed Libaw-Horowitz that it would not sell the property. Instead, it offered the land publicly for development under a long-term lease. In response, Libaw-Horowitz filed suit against the City for breach of contract.

The City settled the lawsuit with Libaw-Horowitz in 2003 and the land was sold to Libaw-Horowitz. As part of the settlement agreement, Libaw-Horowitz agreed to dedicate 2.6 acres of the property for park and recreational purposes. In January 2004, Libaw-Horowitz gave written notice to the Food Bank that its revocable permit to occupy the land would terminate on February 29, 2004. Occupants of the community garden filed a lawsuit arguing the City's settlement with Libaw-Horowitz violated their rights, and they were granted an injunction allowing them to remain on the land until the case was resolved in favor of Libaw-Horowitz in June of 2005. Use of the property as a community garden ceased in 2006 when the community garden was vacated. The property has remained vacant ever since.

In 2008, the Horowitz Group, as a successor-in-interest to Libaw-Horowitz, proposed to sell the property to a major Los Angeles-based garment manufacturer that expressed interest in purchasing the property to develop a 46-foot high, two-story structure containing approximately 643,000 square feet of warehouse and ancillary support space with subterranean parking for 306 cars. The City circulated a mitigated negative declaration to evaluate the proposed development of the property, but the Horowitz Group did not finalize the sale to the proposed developer and did not seek final approval of the proposed project.

In the meantime, the Horowitz Group worked with the City to amend the settlement agreement to substantiate a cash pledge for the dedication of the 2.6 acres of the property for park and recreational purposes. In 2011, the City Council accordingly adopted Ordinance No. 181,949 authorizing execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made, and a special trust fund was created to provide and improve recreational and park facilities in the vicinity of the property. The amendment allows for development of the property consistent with the land use designation and zoning and provides the City with the funds to create or make improvements to recreational facilities in a more appropriate location than the property, which is industrially zoned and isolated to the east and west by major rail lines. In 2012, the City Council adopted a motion authorizing the City Controller to transfer the funds from the special trust find in order to fund improvements at the Pueblo Del Rio housing project, Fred Roberts Park, and the Ross Synder Park. In the meantime, the Los Angeles Community Gardening Council was successful in establishing a new seven-acre community

garden with 190 plots at 110th Street and Avalon Boulevard, to which many of the community gardeners formerly using the property were able to relocate.

In March 2012, the Horowitz Group sold the property to PIMA. In February 2013, PIMA submitted its application to develop the project on the property and in May 2013, the City circulated a mitigated negative declaration ("MND") for the project in accordance with the requirements of the California Environmental Quality Act ("CEQA). The City received many letters of comment in response to the MND. The City, with input from PIMA, agreed that, in light of the comments received from the public, preparation of the environmental impact report ("EIR") was warranted. The draft EIR (ENV-2012-920-EIR, SCH No. 2014061030) for the project was prepared and circulated for public review and comment from January 22, 2015 through March 9, 2015. The final EIR for the Project for the project was completed on June 16, 2016.

General Plan Land Use Designation

The project site is zoned M2-2 located within the Southeast Los Angeles Community Plan area, with a Light Manufacturing land use designation that corresponds to the MR2 and M2 Zones. The proposed use as a light industrial park that will contain garment manufacturing and supportive uses is consistent with the Light Manufacturing land use designation and is permitted within its underlying zones.

Surrounding Properties

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

Street and Circulation

Martin Luther King, Jr. Boulevard, abutting the property to the north, is an Industrial Local Street that will be dedicated to complete a 30-foot wide half right-of-way as a result of the project.

41st Street, abutting the property to the south, is a designated Major Highway that will be dedicated to complete a 52-foot wide half right-of-way as a result of the project/

Alameda Street, abutting the property to the east, is a designated Avenue III that will be dedicated to complete a 36-foot wide half right-of-way as a result of the project.

Long Beach Avenue East, abutting the property to the west, is a designated Boulevard II and is dedicated to a 68-foot wide half right-of-way at the project's street frontage.

Site Related Cases and Permits

Case No. VTT-61482: On August 12, 2010 an application was terminated for the approval of a Vesting Tentative Tract Map for the development of an industrial condominium project.

Case No. DIR-2008-841-SPR: On August 12, 2010 an application was terminated for the approval of Site Plan Review for the development of an industrial condominium project.

Surrounding Related Cases

No relevant cases exist.

Public Hearing and Determination

Public Hearing

A public hearing for the Advisory Agency action was conducted by the Hearing Officer on July 6, 2016, at 11:10 a.m., at Los Angeles City Hall, Room 1020. The hearing was attended by approximately 50 people, including the applicant, the applicant's representatives, and members of the community. Community members who spoke in opposition to the project commented on the adequacy of the project's Environmental Impact Report and were opposed to any new construction on the subject site and were in support of reestablishing a community farm on the subject site. Those individuals in support of the project spoke in support of the local economy boost and job creation the project would provide.

Determination

On September 23, 2016, both requested entitlements (AA-2012-919-PMLA and DIR-2013-887-SPR) were approved for the project. The Advisory Agency's approval of the Preliminary Parcel Map certified the Final Environmental Impact Report ENV-2012-920-EIR (SCH No. 2014061030) for the Project (4051 South Alameda Street Project) and adopted the Mitigation Monitoring Program, the required findings for the certification of the EIR, and a Statement of Overriding Considerations setting forth the reasons and benefits for certifying the EIR with full knowledge that significant impacts may remain.

On October 11, 2016, an appeal was filed on both determinations that were issued for the project. The submitted appeals focus on the adequacy of the project's Environmental Impact Report and do not raise appeal points related to the specific entitlement findings for the Preliminary Parcel Map or the Director's approval of the project's Site Plan Review.

APPEAL ANALYSIS

Staff recommends that the City Planning Commission deny the appeals of the project's Final Environmental Impact Report and sustain the Advisory Agency's approval of Preliminary Parcel Map No. AA-2012-919-PMLA and the Director's approval of Site Plan Review No. DIR-2013-887-SPR. Staff also recommends that the City Planning Commission deny the appeal and sustain the certification of the project's associated Environmental Impact Report, findings, Statement of Overriding Considerations, and accompanying mitigation measures and Mitigation Monitoring Program for ENV-2012-920-EIR, SCH No. 2014061030.

Appeal Summary

The following is a consolidated summary of the appeals submitted by the appellant and the Department's response. Both appeals focus on the City's certification of the project's Environmental Impact Report. Exhibits 5 and 6 include the appeals in their entirety.

1. **Appellant's Statements: Project Description**

The EIR fails to adequately describe the project and to provide sufficient detail about the project operations in order to analyze environmental impacts.

Staff's Response

The appeal does not introduce new evidence in support of these assertions but instead attaches correspondence to which responses were included in the FEIR and in the findings in the Letter of Determination. A letter dated March 9, 2015, submitted in response to the Draft EIR on behalf of the Appellant, argued that the project description was deficient because it did not provide enough information on the specific aspects of the proposed on-site garment manufacturing operations in order to analyze impacts on hazardous materials, traffic, noise and air quality. Contrary to the Appellant's statements and as addressed in Response to Comment No. E7-4 on pages III-70 and III-71 of the FEIR, the project description is sufficient to allow a detailed analysis of the potential environmental impacts of the proposed project. The project description is consistent with the State CEQA Guidelines Section 15124, inclusive of the project's precise location and boundary, statement of objectives, and technical, economic, and environmental characteristics. Pursuant to State CEQA Guidelines, the project description should not provide extensive detail beyond that needed for the evaluation and review of potential environmental impacts.

The information required pursuant to the CEQA Guidelines is provided in Chapter III, *Project Description*, of the Draft EIR and in Chapter IV, *Corrections and Additions to Draft EIR*, in the FEIR. As described therein, the proposed project includes the construction of a new industrial development consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. The project's proposed site plan is contained in revised Figure III.B-1 in Chapter IV, *Corrections and Additions to Draft EIR*, in the FEIR. The location and boundary are provided in the project description, and a project

Location Map showing the precise boundary of the project is included as Figure II.A-3 of the Draft EIR.

A general description of the project's technical and environmental characteristics can be found in Section III.B of the Draft EIR. This section provides a summary of site-specific recommendations, local hire agreement, and construction scenario and phasing plan. Site ingress and egress locations for construction, emergency evacuation planning, and safety and security issues are also described. The total number of employees is identified on page IV.A-9 in Section IV.A, *Impacts Found to Be Less Than Significant*, of the Draft EIR as 990, which consist of 580 employees transferred from existing nearby facilities and 410 new employees. The project objectives are discussed in Section III.C of the Draft EIR.

Sufficient information has been provided in the project description, including the construction scenario, to allow a detailed analysis of the potential environmental impacts of the proposed project on the routine use, storage, and transport of hazardous materials, which was evaluated in Chapter VIII of the Initial Study attached as Appendix III to the Draft EIR, Chapter IV.E, Hazards and Hazardous Materials of the Draft EIR, and Chapter IV of the FEIR. As discussed therein, the project will occupy 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space for the manufacture of clothing, which would not result in significant impacts from the routine transport, use, or disposal of hazardous materials. The project is located in an M2 industrial zone, under which a variety of industrial and warehouse uses are permitted per the LAMC. Further, the proposed project would be required to comply with all relevant federal, state, and local statutes and regulations, including regulations of the routine use and storage of chemicals pursuant to 42 U.S. Code Section 11021, which require the facility owner to prepare a list of available Material Safety Data Sheets.

The project description and level of detail concerning the type of industrial use based on the ITE traffic rates for the corresponding land use category is sufficient to be used to evaluate impacts on traffic, noise, and inputs to the air quality model. The trip generation rates and methodology in the traffic study were reviewed and approved by LADOT. As discussed on pages 4.G-12 through 4.G-13 in Chapter IV.G, *Traffic and Transportation*, of the Draft EIR, trip generation rates for the proposed project are based on the nationally recognized recommendations of the Institute of Transportation Engineers (ITE). ITE also provides information on the percentage of truck traffic associated with this type of land use, and approximately 20 percent of all vehicular trips generated by a warehouse are designated as truck trips to evaluate a conservative, worst-case scenario. A truck trip is generally equivalent to two (2) passenger car trips on average. Therefore, a 2.0 factor was applied to the number of truck trips to estimate passenger care equivalent (PCE) trips generated by the trucks.

As more fully detailed in the EIR, inclusive of the *Addendum to Traffic Impact Study* attached as Appendix IX to the Draft EIR, based on the vehicle trip generation rates in the ITE Manual for the proposed uses, the project will generate approximately 1,968 net PCE trips per average day, 351 of which would be truck trips. As discussed in Response No. E7-2 on FEIR page III-64, truck traffic for the project will consist of box trucks and cargo vans. As discussed on page 3 of the *Air Quality Health Risk Assessment* attached as Appendix V to the Draft EIR (the HRA), the cargo vans used at the facility are categorized in the EMFAC 2011 emissions model as Light Duty Truck 2 (LDT2) and Light Heavy Duty Truck 1 (LHD1). The box trucks are categorized as Light Heavy Duty Truck 2 (LHD2). These three categories of trucks can be either gasoline or diesel fueled. The fraction of diesel-fueled vehicles at the project was determined from EMFAC for Los Angeles County. Of the box trucks, approximately 17.03% are diesel fueled, while 1.46% of LDT2 and 0.20% of LHD1 are diesel fueled. It was assumed that one-half of the trucks are box vans, so the total percentage of the 351 trucks per day that

visit the facility that are diesel-fueled will be about 9%, or approximately 31 diesel-fueled trucks per day. According to the Applicant, current operations involve approximately 33 truck trips per day, and the number of truck trips are not expected to significantly increase above that number in connection with the operation of the project. However, the HRA analyzed potential health risks associated with diesel emissions based on the full ITE rate of 351 daily truck trips and concluded that potential risks are well below established thresholds and therefore constitute a less than significant impact. The health risks associated with only 33 daily truck trips would be substantially less than what was already determined to be a less than significant impact in the HRA. Air quality and noise impacts are further discussed below on pages 11 – 12.

2. Appellant's Statement: Alternatives Analysis

There EIR fails to analyze a reasonable range of alternatives that would avoid or reduce the project's admittedly significant environmental impacts, especially air quality.

Staff's Response

The appeal does not introduce new evidence in support of these assertions but instead attaches correspondence to which responses were included in the FEIR. As addressed in FEIR Response to Comment Nos. E7-2, E7-5 and E7-6, Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but must consider a reasonable range of alternatives that will foster informed decision making and public participation. The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible and briefly explain the reasons underlying the Lead Agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental effects.

The FEIR considered the following three alternatives, Alternative A: No project Alternative; Alternative B: Use of Clean Fuel Trucks; and Alternative C: Reduced Truck Operations. As discussed in Chapter VI of the Draft EIR, under the No Project Alternative, the project would not be constructed, and the existing conditions at the project site would remain unchanged until a future project is proposed for development consistent with the existing zoning. The No Project Alternative would not meet any of the project objectives, and would not develop the property for its designated purpose as light manufacturing in accordance with the objectives of the adopted Southeast Los Angeles Community Plan.

The Use of Clean Fuel Trucks Alternative is capable of achieving the six project objectives. The Use of Clean Fuel Trucks Alternative affects only the operational phase of the project, and the construction scenario would be the same as that described for the project. Because the grading area and the number of days of construction are the primary drivers of PM_{10} emissions during the construction phase of the project, the grading area and duration of the construction scenario under this alternative would be the same as the project and would require implementation of Mitigation Measures Air-1 through Air-7, and would result in similar construction emissions compared to the project. The Use of Clean Fuel Trucks Alternative would also have the same trip generation as the project and would result in significant impacts with regard to operational traffic and transportation at the intersection of Alameda Street and Washington Boulevard, which would operate at LOS E during the p.m. peak hour. The Use

of Clean Fuel Trucks Alternative would therefore not eliminate the significant and unavoidable impact resulting from the project.

The Reduced Truck Operations Alternative would also achieve the six objectives of the project. Moreover, because it proposes to reduce the number of daily truck trips for the project to no more than 75, it would avoid the project's only significant and unavoidable impact, which is p.m. peak hour traffic at the intersection of Alameda Street and Washington Boulevard. However, the City determined that the Reduced Truck Trip Alternative is infeasible because the imposition of a condition which sets a permanent cap or limit on truck trips would limit the potential economic growth and long term viability of industrial-zoned site. In the event that the project remains the same but the nature of the operations on the property changes or the Applicant's business expands, there would not be an opportunity to revisit the trip cap and reassess the possibility of an adjusted limit. In addition, an alternative that would limit truck operations presents practical difficulties with respect to long term enforcement following the construction of the project. Both of the project's requested entitlements, a parcel map and site plan review, do not avail themselves of an inherent plan approval process that would allow the City to revisit compliance with conditions and potentially revoke a grant if a condition is not appropriately followed in perpetuity. The challenge of ongoing monitoring would be potentially further complicated in the event that the lots created by the recorded parcel map are sold to four separate entities in the future and the number of truck trips would be required to be allocated among the four owners, each of which be required to be monitored. The City accordingly rejected the Reduced Truck Operations Alternative as infeasible.

The EIR also considered two alternate land use alternatives, the Community Garden Alternative and the Park or Recreational Use Alternative. As discussed in Response to Comments No. E7-2 in the FEIR, in response to comments submitted on behalf of the Appellant to the Draft EIR, the Community Garden alternative was withdrawn from consideration as it does not meet the project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project.

As further documented throughout the Draft EIR and FEIR, the former interim use of the project site as a community garden that occurred under previous ownership was acknowledged. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the project site for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow a proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the project site would be inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of

$3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. The City Council subsequently authorized release of the funds to finance improvements at the Pueblo Del Rio Housing project, Fred Roberts Park, and Ross Snyder Park (see pages IV-11 and IV-12 of Section IV, *Corrections and Additions to the Draft EIR* of the FEIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR). In sum, the EIR considered a reasonable range of alternatives that could meet project objectives and could reduce or substantially lessen project impacts. Impacts to air quality are discussed below on pages 11-12.

3. Appellant's Statement: Air Quality and Noise

EIR fails to adequately disclose and mitigate the project's noise and air quality impacts on sensitive receptors.

Staff's Response

The Appellant incorrectly states that the EIR fails to mitigate the project's noise impacts. Noise impacts were evaluated in Section XII of the Initial Study, attached as Appendix III to the Draft EIR. As discussed therein, the City's CEQA Threshold Guide states that a project would have a significant impact on noise levels if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a sensitive receptor. As discussed on Initial Study page B-124, the loudest phases of construction (excavation/grading and finishing) will generate noise levels upwards of 79.3 dBA at the nearest sensitive receptor located 153 feet to the west of the project site. Therefore, construction noise related to the project has the potential to exceed the City's existing noise regulation by 6.0 dBA at sensitive receptors. In order to reduce noise impacts to below the City's existing noise regulation, the project would incorporate a temporary noise barrier as a project design element during outdoor construction activities that would exceed allowable levels. The temporary noise barrier would be installed at the western boundary of the project site, along Long Beach Avenue. The temporary noise barrier would exceed the needed 6.0 dBA reduction at sensitive receptors and therefore avoid the need for implementing noise mitigation measures pursuant to the existing noise regulation.

Regarding project operations, as discussed on Initial Study page B-125, the greatest noise level generated by typical building equipment at a distance of 50 feet is 61 dBA, which is well below the significance threshold of 73.3 dBA. Furthermore, noise generated from mechanical equipment is generally absorbed and or sheltered by on-site structures and buildings, further reducing noise levels. Because the nearest sensitive receptor is 153 feet away from the project site, operational noise impacts associated with mechanical equipment would be less than significant. The greatest potential noise level generated by typical parking lot sources at a distance of 50 feet is 66 dBA, which is below the significance threshold of 78.3 dBA. Therefore, the project would not result in significant impacts to noise in relation to construction or operation of the project, and no further analysis related to permanent increases in ambient noise levels is warranted.

The Appellant also incorrectly states that the project would result in admittedly significant impacts to air quality. As discussed in Section IV.B of the Draft EIR and page III-65 in Response to Comment No. E7-2 of the FEIR, criteria pollutants generated during construction and operation of the project are calculated to be below acceptable thresholds except with

respect to PM_{10} emissions during construction, which would be reduced to less than significant levels through implementation of mitigation measures Air-1, Air-2, and Air-3:

- Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).
- Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).
- Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Emissions of VOCs will be further reduced below acceptable levels through implementation of the following mitigation measure:

- Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Construction-related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts so the impacts of short-term TACs from the construction of the project are considered less than significant and were not quantified as part of the Draft EIR. For operations of the project, there will be an estimated 31 diesel fueled trucks/day out of a total 351 total truck trips/day under the most conservative scenario. Because the total of 351 is greater than 100 daily truck trips, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk (Appendix V in Volume IV of the Draft EIR). The maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in one million. Therefore, the project would not result in the significant human health risks related to diesel emissions. The alternatives with clean fuel trucks and reduced truck operations would result in even fewer diesel emissions. Operational emissions generated from mobile sources will be further reduced below acceptable levels through implementation of mitigation measures Air-4, Air-5 and Air-6.

In addition to the above mitigation measures, and as discussed on FEIR page IV-13, emissions generated from mobile sources will be further reduced below acceptable levels as a result of the On-Road Heavy-Duty Diesel Vehicles Regulation Amendments approved by the California Air Resources Board (CARB) in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles. As a result of the various measures required to reduce impacts on air quality, the project will have a less than significant effect on air quality.

In sum, the FEIR fully and adequately analyzes the project's impacts on noise and air quality, and the conclusions in the FEIR that the noise and air quality impacts of the project can be mitigated to a less than significant level are supported by substantial evidence. The Appellant fails to provide substantial evidence to the contrary.

4. Appellant's Statements: Project Objectives

The EIR forecloses the consideration of alternatives based on impermissibly narrow project objectives.

Staff's Response

The Appellant has attached a letter dated March 9, which asserted that the project alternatives precluded consideration of additional alternatives, including a community garden alternative, a park alternative, preservation of a portion of the project site as open space, and an alternative location. The Appellant has also attached a letter dated July 5, 2016, which argues that the response to the assertions in the March 9 Letter was inadequate.

As specified in Section 15126.6(b) of the State CEQA Guidelines, the purpose of the consideration of alternatives is to identify ways to mitigate or avoid the significant effects that the project may have on the environment and allows for the consideration of alternatives to the "project or location" which are capable of avoiding or substantially lessening any significant effects of the project. The proposed project was specifically located to avail itself of the existing labor pool that resides in close proximity to the proposed project site. Further, the significant impacts of the proposed project are related to traffic. The proposed project has mitigated all significant impacts to below a level of significance through mitigation measures with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard.

As stated in Chapter III of the Draft EIR, the project objectives are as follows:

- Construct a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing.
- Locate a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- Develop an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- Provide opportunities for the proposed project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project.
- Preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- The Southeast Los Angeles Community Plan Area population stands to benefit from the proposed project due to economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City.

As discussed in Response No. E7-5 on page III-73 of the FEIR, the first of the six objectives was based on the applicant's anticipated space requirements to accommodate the anticipated garment manufacturing, consistent with the City of Los Angeles light manufacturing land use designation and Zoning Ordinance. The applicant is currently operating facilities in proximity to the proposed project site and has exceeded the capacity of the existing facility. The requirement for the minimum square feet is based on their documented need for additional space. The second and fifth objectives are consistent with the adopted goals and objectives of the Southeast Los Angeles Community Plan Area to encourage the provision of jobs in

proximity to labor resources and to preserve or redevelop industrial land uses in the plan area, as discussed in Section IV.F, Land Use section of the Draft EIR (see page IV.F-4). The third and fourth objectives are consistent with the adopted goals and objectives of the Transportation Element of the City of Los Angeles General Plan and the Southeast Los Angeles Community Plan which encourage development in conjunction with existing infrastructure and use of the transit system to move people and goods, as discussed in Section IV.G, Transportation/Traffic section of the Draft EIR (see pages IV.G-3 and -4). The sixth and final objective was also crafted in alignment with the Southeast Los Angeles Community Plan to promote economic stimulation in the plan area through employment opportunities and tax revenue from the industrial land uses.

Contrary to the Appellant's claims, the project objectives did not preclude the consideration of a reasonable range of alternatives. As described above, the FEIR evaluated the No Project Alternative, the Use of Clean Fuel Trucks Alternative, and the Reduced Truck Operations Alternative. The Community Garden Alternative and the Park or Recreational Use Alternative were withdrawn from consideration because they did not satisfy the project objectives. Furthermore, as discussed above, the Draft EIR and FEIR describe how the City Council determined that use of a portion of the project site for park purposes would be inappropriate due to the property's location in an industrial corridor and isolated to the west and east by major rail lines, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property. The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. The City Council subsequently authorized release of the funds to finance improvements at the Pueblo Del Rio Housing project, Fred Roberts Park, and Ross Snyder Park (see pages IV-11 and IV-12 of Section IV, *Corrections and Additions to the Draft EIR* of the FEIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR).

The project has mitigated all significant impacts to below a level of significance with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. Relocation to an alternative site would not change the project's trip generation. An alternative location would also likely not achieve the project goals and objectives related to minimizing worker travel because locating the project in close proximity to the existing public transit system and other multimodal transportation alternatives would likely decrease average vehicle miles travelled per employee. Furthermore, it is well established that in contrast to public infrastructure projects, private development projects generally do not need to evaluate alternative locations as part of their alternative analysis, as it is reasonably assumed that the developer owns or controls the project site, but not multiple other sites in different locations. A comparison of site specific conditions or potential impacts at unknown or non-existent sites is speculative and not supported by evidence, and would not be appropriate. Section 15126.6(f)(1) of the CEQA Guidelines states that site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site are among the factors to be considered when addressing the feasibility of alternatives. Finally, the EIR did indeed evaluate alternatives that could reduce project-related impacts. The Reduced Truck Operations Alternative would avoid and substantially lessen the effects of the project by limiting the number of daily truck trips and thus meet the requirements of the State CEQA Guidelines, which requires the consideration of alternatives that could avoid or substantially lessen the impacts of the project.

5. Appellant's Statements: Mitigation Measures

The EIR fails to require concrete and enforceable mitigation measures.

The EIR impermissibly defers analysis and mitigation of environmental impacts to post-approval processes.

Staff's Response

Prior comments submitted on behalf of the Appellant had asserted that the project's mitigation measures were impermissibly vague. Those mitigation measures that were identified as vague were Mitigation Measure Air-4 Air-6, and Traffic-3. Mitigation Measure Utilities and Service Systems-1 was described as requiring deferred mitigation. Such comments were adequately addressed in Response to Comment No. E7-8 in Chapter III of the FEIR. The Appellant has not provided further evidence to the contrary, but rather has made general statements that the mitigation measures were not concrete or enforceable.

As detailed in Response to Comment No. E7-8, Mitigation Measures Air-4 and Air-6 further reduce operational air quality impacts that are already less than significant. Nevertheless, Air-4 and Air-6 were included in the EIR in order to further reduce air quality emissions below already acceptable levels. As stated in the Draft EIR, Mitigation Measures Air-4 and Air-6 are as follows:

> Air-4: The project applicant shall establish incentives for increased transit frequency.
>
> Air-6: The project applicant shall provide traffic calming measures through street improvements.

However, in response to comments received on the Draft EIR, Mitigation Measures Air-4 and Air-6 were refined (see pages III-80 and III-81 in Chapter III *Responses to Comments*, and pages IV-4 through IV-6 in Chapter IV *Corrections and Additions to Draft EIR*, in the FEIR):

> Air-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code ("LAMC"), which include the following requirements for nonresidential projects with more than 100,000 square feet of floor area.
>
> (a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:
>
> 1) Current routes and schedules for public transit serving the site;
> 2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
> 3) Ridesharing promotion material supplied by commuter-oriented organizations;
> 4) Regional/local bicycle route and facility information;
> 5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.
>
> (b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:
>
> 1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least

ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

7) Bicycle parking shall be provided in conformance with Section 12.21A16 of the LAMC.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Mitigation Measure Traffic-3 requires that the project dedicate land along its 41st Street frontage between Alameda Street and Long Beach Avenue. This street dedication is pursuant to Bureau of Engineering requirements, and is a condition of approval for the project.

Prior comments submitted on behalf of the Appellant had asserted that Mitigation Measure Utilities and Service Systems-1 represents deferred mitigation. This comment was addressed in Response to Comment No. E7-8 in Chapter III of the FEIR. Mitigation Measure Utilities and Service Systems-1 provides as follows:

> Utilities and Service Systems-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

The Draft EIR determined that the existing storm water and sewer capacity would be adequate to accommodate the project, and there would accordingly be no significant impact. The additional gauging to support the sizing and location of sewer connections provides an additional check that is part of standard City review processes, and should not be considered deferred mitigation. Further, the City has adopted a Mitigation Monitoring Plan which is included as Chapter V of the FEIR and which will ensure that the mitigation measures for the project are enforced. The Appellant provides no support for its assertion that the FEIR impermissibly defers analysis and mitigation of environmental impacts to post-approval processes.

6. Appellant's Statements: Greenhouse gas impacts

The EIR fails to adequately analyze and mitigate greenhouse gas emissions.

Staff's Response:

The Appellant's comments regarding greenhouse gas emissions were addressed in Section IV.D of the Draft EIR and FEIR Response to Comment No. E7-9. As discussed therein, the modeling for direct, indirect, and cumulative greenhouse gas (GHG) emissions was conducted in accordance with CalEEMod2013.2.2, which is a statewide model, accepted by the South Coast Air Quality Management District (SCAQMD), to calculate air quality and GHG emissions in land use projects. The model incorporates multiple components of the project including the construction scenario with its heavy construction equipment, landscaping, mobile trips (car and truck), architectural coatings, and potential energy and water efficiency savings. Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO2e. Operational emissions equal approximately 2,090.25 metric tons of CO2e per year. The operational GHG emissions can be attributed to mobile sources associated with the project's approximate 353,375 square feet of warehouse space. In the absence of regional thresholds adopted for GHG emissions, the California Air Resources Board (CARB) has suggested a threshold of 25,000 metric tons of CO2e per year for the quantitative analysis of GHG emissions. Additionally, based on the suggested thresholds proposed by the California Air Pollution Control Officers Association (CAPCOA), the project would be expected to have the potential to result in significant impacts related to global climate change if the project emits more than 25,000 metric tons of CO2e per year. Because the project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO2e per year, mitigation measures are not required. Compliance with the following mandatory measures in the Los Angeles Green Building Code will further reduce the project's direct GHG emissions below acceptable levels:

- **99.05.106.5.3.1**. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number

of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- **99.05.203.1.3**. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent.
- **99.05.210.1**. ENERGY STAR Equipment and Appliances. Residential grade equipment and appliances provided and installed shall be ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.
- **99.05.211.4**. Prewiring for Future Electrical Solar System. Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.
- **99.05.303.2**. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.
- **99.05.410.1**. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals

Substantial evidence therefore supports the conclusion that the project will not result in significant impacts due to GHG emissions. The Appellant has not provided substantial evidence to the contrary.

7. Appellant's Statements: The EIR fails to provide good faith, reasoned responses to comments submitted by State Agencies and members of the community during the CEQA process.

Comments submitted by Caltrans have not received adequately responses

Staff's response:

The Appellant claims that responses to comments received from Caltrans regarding the Draft EIR were inadequate. Contrary to Appellant's assertion, the FEIR fully addressed the comments made by Caltrans on the Draft EIR regarding project impacts to State highways.

As discussed in the FIER, regarding the necessity of a traffic analysis of State highway facilities, the traffic analysis was conducted per the scope of study identified in a memorandum of understanding (MOU) signed in consultation with the City of Los Angeles Department of Transportation ("LADOT"). Because the project site is entirely within the jurisdiction of the City, LADOT requires the traffic study to follow the guidelines established in its "Traffic Study Policies and Procedures" document. The most recent version of the guidelines, dated August 2014, includes a section that addresses the need for analysis of State highway facilities. The following is an excerpt from LADOT guidelines relevant to State highway facilities (refer to Section E, page 8 of Traffic Study Policies and Procedures, which is included as Appendix B of the FEIR):

FREEWAY IMPACT ANALYSIS SCREENING CRITERIA

Pursuant to the Freeway agreement executed in October 2013 between LADOT and Caltrans District 7, traffic studies may be required to conduct a focused freeway impact

analysis in addition to the CMP analysis described above. If the proposed project meets any of the following criteria, the applicant will be directed to the Caltrans' Intergovernmental Review section for a determination on the need for analysis and, if necessary, the methodology to be utilized for a freeway impact analysis:

- *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F (based on an assumed capacity of 2,000 vehicles per hour per lane); or*
- *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or*
- *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or*
- *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane).*

The project's traffic study and existing conditions section on freeway segment analysis included an analysis of the project's estimated trip generation and distribution, existing traffic counts, lane configuration and level of service (LOS). The project is a relocation of four light manufacturing facilities to a new location (per project plans); thus, although all 351 project-related trips were analyzed for purpose of the traffic study in accordance with the ITE Manual, the majority of the trips (over 50 percent) already occur in the baseline conditions. No trip subtraction was taken due to any existing on-street project traffic in order to assume a conservative worst-case scenario. Information for freeway segment and ramp intersections was analyzed to determine if the project meets the agreed upon criteria in order to proceed with freeway impact analysis using the Caltrans Guide for the Preparation of Traffic Impact Studies (latest version, December 2002, which is included as Appendix C to the FEIR). The freeway segments of I-10 EB (East of Alameda Street, and West of Alameda Street) as well as I-10 WB (East of Alameda Street, and West of Alameda Street) were analyzed. The results of this analysis indicated that the project does not meet any of the criteria requiring a freeway impact analysis. At freeway LOS E or F, project trips must increase freeway peak hour volume by 100 in either direction (i.e., 1 percent of 5-lane freeway capacity, 10,000 vehicles per hour). The existing I-10 Freeway segments in the study area are operating at LOS F. The project contributes a maximum of 22 trips in both EB and WB direction of the freeway (Table IV G.3, p. IV.G-8 of the Draft EIR) during the peak hour, which is less than the 100 trips threshold requiring additional impact analysis.

The City determined that the project is not regionally significant, as defined by Section 15206(b)(2) of the CEQA Guidelines, because the project is not an industrial, manufacturing, or processing plant, or industrial park that plans to house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. The project consists of 994 planned employees. The project area is 12.9 acres, and the total floor area of all four proposed buildings is 480,120 square feet. Therefore, the project meets none of the criteria that require it to be considered as regionally significant. Therefore, the project is not of regional significance and would not change trip patterns or induce growth of trips regionally.

A cumulative analysis was undertaken for all the study surface intersections as required by LADOT Policy and Procedures. However, because the number of peak-hour trips generated

by the project would not exceed the applicable threshold of 100 peak-hour trips in either direction on the I-10 Freeway, the project's traffic contribution to freeways and off-ramps was determined to be not large enough to include in the analysis as per LADOT's "Traffic Study Policies and Procedures" document. As a result, a cumulative analysis was determined not to be required for freeways and off-ramps. To analyze cumulative traffic impacts, traffic study guidelines require an analysis of trip generation, distribution and level of service at key intersections and roadways using the list of all planned and approved projects in the vicinity of the project that would be assumed to be built prior to construction of the project. Accordingly, a list of such projects was obtained from the City and a total of five projects were identified for cumulative traffic analysis. The estimated traffic volume from these projects was added to project traffic volumes and the existing traffic volumes (multiplied by a traffic growth factor to account for any smaller projects and population growth through the opening year of the project). The intersection level of service determined with this combined volume was used to measure cumulative traffic impacts. A cumulative analysis was undertaken for all the study surface intersections as required by LADOT Policy and Procedures. However, as discussed above, the project's traffic contribution to freeways and off-ramps was determined to be not large enough to include in the analysis. As a result, a cumulative analysis was deemed unnecessary for freeways and off-ramps. There is no evidence in the traffic study prepared for the project that demonstrates impacts to freeway facilities, no evidence has been provided that would warrant this additional analysis, and no evidence has been provided that disputes the findings of the Traffic study that was undertaken pursuant to the provisions of the MOU agreed to by Caltrans and LADOT. Section IV.G Traffic, page IV.G-17 and the Traffic Impact Study (Appendix III IS-5 of the Draft EIR, pages 22 through 24, and Addendum to Traffic Impact Study, Appendix IX to the Draft EIR, pages 5, 7–9, and 23) in the Draft EIR discuss in detail why additional cumulative analysis, including further discussion of State facilities in the vicinity of the project, would not be required under CEQA.

8. Appellant's Statements: Statement of Overriding Considerations

The Statement of Overriding Considerations lacks the required substantial evidence to support its claims that the project alternatives are infeasible and that project benefits outweigh the project's admittedly significant environmental impacts.

Staff's Response:

The FEIR determined that a significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour is unavoidable even after incorporation of all feasible mitigation measures. The July 5 Letter submitted on behalf of the Appellant argued that a Statement of Overriding Considerations is required for the project. The City has now adopted a Statement of Overriding Considerations, and the Appellant states that it is not supported by substantial evidence but provides no information to support this claim. Notwithstanding the Appellant's assertion to the contrary, the Statement of Overriding Considerations adopted for the project is supported by substantial evidence. The significant and unavoidable impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour is outweighed by specific economic, social, and other considerations, based upon the FEIR, the public record, and the adopted Statement of Overriding Considerations.

- The proposed development of the project site for light industrial use will effectuate the goals and policies of the Southeast Los Angeles Community Plan by converting an existing underutilized vacant parcel of land to productive use as a light manufacturing facility on property that is planned and zoned for light industrial use.

The goals and policies of the South East Los Angeles Community Plan which support the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

- Development of the project will result in the creation of more than 450 new permanent garment manufacturing jobs. The project applicant has entered into a Local Hire Agreement with the Coalition for Responsible Community Development ("CRCD") and the Los Angeles Job Corps, according to which the applicant will make an assertive effort to hire local residents for at least 50 percent of new employment positions and/or employment positions for which local residents are qualified that become vacant during the term of the agreement. Priority will be given to local residents in the following order: (i) those living within one mile of the project site, (ii) those living more than one mile but within three miles of the project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The applicant will also pay a one-time fee of $250,000 to CRCD and the Los Angeles Job Corps.

The total number of employees is identified on page IV.A-9 in Section IV.A, *Impacts Found to Be Less Than Significant*, of the Draft EIR as 990, which consist of 580 employees transferred from existing nearby facilities and 410 new employees. A copy of the Local Hire Agreement is attached as Appendix O to the FEIR.

- The project applicant's general contractor has entered into a Construction Local Hire Agreement with Playa Vista Job Opportunities and Business Services ("PVJOBS") for each of the four new buildings to be developed on the project site, according to which an assertive effort will be made such that 20 percent of all hours worked in construction will be performed by local residents. Priority will be given to local residents in the following order: (i) those living within one mile of the project site, (ii) those living more than one mile but within three miles of the project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. An assertive effort will also be made such that included within the 20 percent local hire goal, 10 percent of all hours worked in construction will be performed by at-risk individuals, who are described in the agreement as a local resident who lacks a high school diploma or GED, has a history of substance abuse, has a household income below 50 percent of median, is homeless, a welfare recipient, has a history of involvement with the justice system, is chronically unemployed, or a single parent.

A copy of the Construction Local Hire Agreement for each of the four buildings to be constructed on the project site is included as Appendix O to the FEIR.

- Development of the project will result in improved public infrastructure due to the dedication and widening of the public right-of-way along Alameda Street, 41st Street, and Long Beach Avenue as well as new curbs, gutters, sidewalks, street trees, street lights, and upgraded traffic control devices.

Condition of Approval No. 14 for Case No. 2012-919-PMLA requires the dedication and improvement of Martin Luther King Jr. Boulevard, Alameda Street, and 41st Street, and the improvement of Long Beach Avenue adjoining the project site with new paving, curbs, gutters, sidewalks, including the removal and reconstruction of existing improvements such as street trees, street lights, and traffic control devices, prior to recordation of the final parcel map for the project. Furthermore, Mitigation Measure Air-6 requires that in connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works

- The development of the project as proposed will directly result in increased revenues to the City of Los Angeles through increased property taxes based on an increase of approximately $30 million in assessed value upon completion of construction based on approximate construction costs of between $60.00 and $65.00 per square foot of floor area, and will indirectly result in increased revenues through increased sales and other use taxes from higher rates of employment in the surrounding community.

The City of Los Angeles Department of Building and Safety has valued the construction of the project at $31,939,056 for purposes of establishing the building permit fee, which is $66.52 per square foot based on 480,120 square feet of total floor area. The increased value of the project site upon completion of the project will result in a higher assessed value for property tax purposes, which in turn would increase City revenues. The amount of indirect revenue due to increased sales tax and other use taxes is less easily quantified but is expected to contribute in some measure to City revenues.

Conclusion

The appeals of Preliminary Parcel Map No. AA-2012-919-PMLA, Director's Site Plan Review No. DIR-2013-887-SPR, and Environmental Impact Report ENV-2012-920-EIR / SCH No. 2014061030 do not demonstrate that the Advisory Agency erred or abused their discretion. The findings made in approving the Preliminary Parcel Map and Site Plan Review and in certifying the project's Final Environmental Impact Report have been done in conformance with provisions of the State's Subdivision Map Act, the Los Angeles Municipal Code and the California Environmental Quality Act.

Therefore, since the Case Nos. AA-2012-91-PMLA and DIR-2013-887-SPR were approved pursuant to the provisions of State's Subdivision Map Act and the Los Angeles Municipal Code, and since the EIR (Case No. ENV-2012-920-EIR / SCH No. 2014061030) meets the requirements of the California Environmental Quality Act, the appeals should be denied, the actions of the Advisory Agency and Director of Planning should be sustained, and the findings the Advisory Agency and Director of Planning should be adopted as the findings of the City Planning Commission.

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

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Decision Date: September 23, 2016

Appeal Period Ends: October 10, 2016

Pima Alameda Partners, LLC (A/O)
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Los Angeles, CA 90010

Gilbert Engineering (E)
2028 E. Route 66, Suite 203
Glendora, CA 91740

Richard Lucas (R)
C.E.G. Construction
7901 Crossway Drive
Pico Rivera, CA 90660

Parcel Map No.	AA-2012-919-PMLA
Address:	4051 S. Alameda [1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street]
Related Case:	DIR-2013-0887-SPR
Location:	4051 South Alameda Street
Community Plan Area:	Southeast Los Angeles
Zone:	M2-2
Council District:	9 – Price
Legal Description:	Lot 21-24 and 36-38 of Tract 5485
CEQA:	ENV-2012-920-EIR SCH No. 2014061030

Pursuant to Sections 21082.1(c)(3) and 21081.6 of the Public Resources Code, the Advisory Agency hereby **Certifies** the Final Environmental Impact Report, ENV-2012-920-EIR (SCH No. 2014061030), for the Project (4051 South Alameda Street Project) and adopts the Mitigation Monitoring Program, the required findings for the certification of the EIR, and a Statement of Overriding Considerations setting forth the reasons and benefits for certifying the EIR with full knowledge that significant impacts may remain. The Advisory Agency also **Advises** the applicant that pursuant to the California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that environmental mitigation measures are implemented and maintained through the life of the project and the City may require any necessary fees to cover the cost of such monitoring; and that pursuant to the State Fish and Game Code Section 711.4, a Fish and Game and/or Certificate of Game Exemption is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notices and Determination (NOD) filing.

EXHIBIT 1

Pursuant to Los Angeles Municipal Code (LAMC) Section 17.53, the Advisory Agency **approved Parcel Map No. AA-2012-919-PMLA**, located at 4051 S. Alameda [1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street], for a maximum four-parcel industrial development and merger of the right-of-way along 40th Place and the two alleys north and south of 40th Place as shown on the revised map stamp-dated April 11, 2016.

(Verification should be obtained from the Department of Building and Safety, which will legally interpret the Zoning code as it applies to this particular property.) For an appointment with the Public Counter call (213) 978-1362 or (818)374-5050.

The Advisory Agency's approval is subject to the following conditions:

The final map must record within 36 months of this approval, unless a time extension is granted before the end of such period.

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

BUREAU OF ENGINEERING

1. That a 5-foot wide strip of land be dedicated along Martin Luther King Jr. Boulevard adjoining the subdivision to complete a 30-foot wide half right-of-way dedication in accordance with Industrial Local Street Standards, including a 20-foot radius property line return at the intersection with Alameda Street.

2. That a 12.5-foot wide variable-width and 8.5-foot strip of land be dedicated along Alameda Street adjoining the subdivision to complete a 36-foot wide half right-of-way dedication in accordance with Avenue III based on the Mobility Plan designation, including a 20-foot radius property line return at the intersection with 41st Street.

3. That a 22-foot wide and variable-width strip of land be dedicated along 41st Street adjoining the subdivision to complete a 52-foot wide half right-of-way dedication in accordance with Major Highway Standards.

4. That Board of Public Works approval be obtained prior to the recordation of the final map for the removal of any tree in the existing or proposed public right-of-way area. The Bureau of Street Services, Urban Forestry Division, is the lead agency for obtaining Board of Public Works approval for removal of such trees.

5. That Department of Transportation in a letter to Advisory Agency state that they have no objection to the merger of 40th Place and the alleys northerly and southerly of 40th Place between Long Beach Avenue and Alameda Street.

6. That in the event a no objection letter has received from the Department of Transportation then 40th Place and the alleys northerly and southerly of 40th Place between Long Beach Avenue and Alameda Street be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20 ½ of the State Government Code, and in addition, the following conditions be executed by the developer and administered by the City Engineer:

   a. That consents to the street and alleys being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged.

   b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

   Note: The Advisory Agency hereby finds that the dedications to be merged are unnecessary for the present or prospective public purposes and all owners of the interest in the real property within the subdivision have or will have consented to the merger prior to the recordation of the final map.

7. That any fee deficit under Work Order EXP00220 expediting this project be paid.

8. That any surcharge fee in connection with the street and the two alleys merger request be paid.

9. That a 10-foot wide sewer easement be dedicated over the existing sewer in 40th Place being merged based on an alignment approved by the Central Engineering District Office.

10. That a Covenant and Agreement be recorded advising all future owners and builders that prior to issuance of a building permit, a Notice of Acknowledgment of Easement must be recorded and an application to do work in any sanitary sewer easements and to construct over the existing sanitary sewer facilities must be submitted to the City Engineer for approval.

11. That two copies of a parking area and driveway plan be submitted to the Central District Office of the Bureau of Engineering for review and approval or that a Covenant and Agreement be recorded agreeing to do the same prior to the issuance of a building permit.

12. That the subdivider make a request to the Central District office of the Bureau of Engineering to determine the capacity of the existing sewers in the area.

13. That the final map be labeled as Parcels "A", "B", "C", and "D" in lieu of Parcels 1, 2, 3, and 4 respectively.

14. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

   a. Improve Martin Luther King Jr. Boulevard being dedicated and adjoining the subdivision by the construction of the following:

(1) A concrete curb, a concrete gutter, and an 8-foot full-width concrete sidewalk with tree wells and covers.

(2) Suitable surfacing to join the existing pavement and to complete a 22-foot wide half roadway.

(3) Any necessary removal and reconstruction of existing improvements.

(4) The necessary transitions to join the existing improvement.

b. Improve Alameda Street being dedicated and adjoining the subdivision by the construction of the following:

(2) A concrete curb, a concrete gutter, and a 13-foot full-width concrete sidewalk with tree wells and covers.

(2) Suitable surfacing to join the existing pavement and to complete a 23-foot wide roadway.

(3) Any necessary removal and reconstruction of existing improvements.

(4) The necessary transitions to join the existing improvements.

c. Improve 41st Street being dedicated and adjoining the subdivision by the construction of the following:

(1) A concrete curb, a concrete gutter, and a 12-foot full-width concrete sidewalk with tree wells and covers.

(2) Suitable surfacing to join the existing pavement and to complete a 40-foot wide half roadway.

(2) Any necessary removal and reconstruction of existing improvements.

(4) The necessary transitions to join the existing improvement.

d. Improve Long Beach Avenue adjoining the subdivision by repairing or replacing any broken or offgrade curb, gutter, sidewalk and roadway pavement; close any unused driveways; plant trees as required; and construct any necessary bus pad.

Note: Any questions regarding this report should be directed to Ray Saidi of the Land Development Group, located at 201 North Figueroa Street, Suite 200, or by calling (213) 202-3492.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

16. Comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

17. That prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:

    a. Show all street dedications as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedication.

    b. Street and alley merger as approved by Bureau of Engineering.

    Notes: Any proposed structures or uses on the site have not been checked for and shall comply with Building and Zoning Code requirements. Plan check will be required before any construction, occupancy or change of use.

    An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Laura Duong at (213) 482-0434 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

18. Prior to the recordation of the final map satisfactory arrangements shall be made with the Department of Transportation to assure:

    a. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line.

    b. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.

    c. Proposed driveways should be designed such that only 1 driveway is allowed per 200' of frontage.

    d. A parking area and driveway plan be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa Street Suite 400, Station 3.

        Note: If you have any questions, please contact the Department of Transportation at (213) 482-7023.

FIRE DEPARTMENT

19. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following: (MM)

    a. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

    b. All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

    c. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

    d. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

    e. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

    f. No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

    g. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

    h. Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

    i. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel.

    j. That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

        (1) The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of

all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

(2) The future owners of affected lots with common fire lanes and fire protection facilities shall be informed or their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.

(3) In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.

(4) Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

(5) That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

Note: The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6509. You should advise any consultant representing you of this requirement as well.

BUREAU OF STREET LIGHTING

20. If new street lights are required, then prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

a. No street lighting improvements if no street widening per the Bureau of Engineering improvement conditions. Otherwise relocate and upgrade street lights; six (6) on Long Beach Avenue; eight (8) on Alameda Street; and two (2) on Martin Luther King, Jr. Boulevard.

STREET TREE DIVISION AND THE DEPARTMENT OF CITY PLANNING

21. Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

    Note: Removal of all trees in the public right-of-way shall require approval of the Board of Public Works. Contact: Urban Forestry Division at: (213) 485-5675. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

22. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

    a. Limit the proposed development to a maximum of four (4) lots.

    b. Parking shall be provided in conformance with the Los Angeles Municipal Code.

    c. The applicant shall install air filters capable of achieving a Minimum Efficiency Rating Value (MERV) of at least 11 or better in order to reduce the effects of diminished air quality on the occupants of the project.

    d. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

    e. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

24. Prior to the clearance of any parcel map conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

25. Prior to the issuance of the building permit or the recordation of the final map, a copy of the Letter of Decision for Case No. DIR-2013-887-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. DIR-2013-887-SPR is not approved, the subdivider shall submit a map modification.

26. Prior to the issuance of a building permit, grading permit and the recordation of the final parcel map, the subdivider shall record and execute a Covenant and Agreement to comply with the South Los Angeles Alcohol Sales Specific Plan.

27. That the subdivider shall make suitable arrangements for clearance with the Community Redevelopment Agency, or its successor in interest, for the Council District 9 Redevelopment Project area.

28. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages and/or settlement costs.

c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).

d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement. (b)

e. If the City determines it necessary to protect the City's interests, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the

applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES

29. That prior to recordation of the final map the subdivider will prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department requiring the subdivider to identify mitigation monitors who will provide periodic status reports on the implementation of mitigation items required by Condition No. 30 of the Parcel Map approval satisfactory to the Advisory Agency. The mitigation monitors will be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, post-construction/ maintenance) to ensure continued implementation of the above mentioned mitigation items.

30. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

Air Quality

MM-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

1) Current routes and schedules for public transit serving the site;

2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

3) Ridesharing promotion material supplied by commuter-oriented organizations;

4) Regional/local bicycle route and facility information;

5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and access ways used by vanpool vehicles when located within a parking structure;

7) Bicycle parking shall be provided in conformance with Section 12.21-A.16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation
Monitoring Period: Pre-occupancy
Monitoring Frequency: One-time prior to occupancy
Action Indicating Compliance: Compliance certification report by project contractor

MM-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Period: Preconstruction
Monitoring Frequency: One-time prior to construction
Action Indicating Compliance: LADOT Approval; Public Works approval

MM-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Period: Preconstruction
Monitoring Frequency: One-time prior to construction
Action Indicating Compliance: LADOT approval; Public Works approval

MM-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Plans and Specifications; Field inspection sign-off; Compliance certification report by project contractor

Cultural Resources

MM-8: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.[1]

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1 Society of Vertebrate Paleontology. "Conformable Impact Mitigation Guidelines." Available at: http://vertpaleo.org/The-Society/Governance-Documents/Conformable-Impact-Mitigation-Guidelines-Committee.aspx

- Paleontological Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: At time of resource discovery, should it occur
Action Indicating Compliance: If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by a qualified paleontologist; if unanticipated discoveries are found, submittal of a report and mitigation plan(s) by a qualified paleontologist.

MM-9: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

- A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

- Cultural Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of

archaeological material, sketches of recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic per recommendations of archaeological monitor.
Action Indicating Compliance: If archaeological resource are unearthed, submittal of compliance certification report and treatment plan by a qualified archaeological monitor.

Transportation and Traffic

MM-10: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Enforcement Agency: Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Transportation
Monitoring Period: Preconstruction; construction
Monitoring Frequency: Once, prior to issuance of building permit; Periodic field inspections during construction
Action Indicating Compliance: Approval from the Los Angeles Department of Transportation Prior to issuance of Building Permit (Pre-

Construction); compliance certification report submitted by Project contractor (Construction)

MM-11: All construction related traffic shall be restricted to off-peak hours.

Enforcement Agency: Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Transportation, Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance: Field inspection sign-off; Compliance certification report submitted by the Project Contractor

MM-12: The project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces.

Enforcement Agency: Los Angeles Department of Transportation; Department of Public Works; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety;
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work
Action Indicating Compliance: Sign-off on construction plans; Sign-off on completed construction work

MM-13: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Bureau of Engineering; Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction

Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work
Action Indicating Compliance: Plans and Specifications; Sign-off on construction plans; Sign-off on completed construction work

Utilities and Service Systems

MM-14: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation
Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation
Monitoring Period: Construction; Operation
Monitoring Frequency: Once prior to final certificate of occupancy; annually during first three years of operation
Action Indicating Compliance: Plans and Specifications

FINDINGS OF FACT (CEQA)

I. Introduction

The applicant, Tony Yu of Pima Alameda Partners, L.L.C., (the "project applicant" or "applicant") proposes to develop a 12.9 acre property located at 4051 S. Alameda Street (the "project site" or "site"), with an industrial park project. Additional addresses for the site include 1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street. The site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. In relation to major highways, the site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The site is rectangular in shape and is transected by a paved road (East 40th Place) through the central portion in an east-west direction. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. The project involves the vacation of two alleys and a street (40th Place) that run east-west through the site. These requests have been made and tentatively approved in conjunction with the related Preliminary Parcel Map project. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon. The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

To evaluate the environmental impacts of the project in accordance with the California Environmental Quality Act ("CEQA"), the City of Los Angeles ("City") prepared a Draft Environmental Impact Report ("Draft EIR" or "DEIR"). The project, as proposed in the Draft EIR, would consist of the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. Collectively, these improvements are referred to herein as the project. The Draft EIR additionally considered a No Project alternative and as well as two operational alternatives to the same built project. The "No project" alternative also included a brief description of two project alternatives as a community garden and park or other recreational use.

II. Environmental Documentation Background

The project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 30-day period commencing June 17, 2014 and ending July 17, 2014. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Notice of Availability (NOA), which noted the completion of the NOP and Initial Study, was mailed directly to more than 64 interested parties and to 108 property owners and residents within a 500-foot radius of the proposed project site. The NOA of the NOP and Initial Study was

also posted on the City's website, at: http://planning.lacity.org/eir/nops/ENV-2012-920-EIR_IS.pdf. The NOP and Initial Study document were available for review and posted at the Vernon Branch Library, located approximately 0.9 mile southwest of the proposed project site at 4504 South Central Avenue; the Junipero Serra Library, located approximately 1.9 miles southwest of the proposed project site at 4607 South Main Street; and the Los Angeles Central Library, located approximately 2.9 miles north of the proposed project site at 630 West 5th Street.

The Department of City Planning received seven letters of comment from public agencies and 225 comment letters or emails from members of the public and other interested parties (Appendix II, *Notice of Preparation Comment Letters* and Table I.A-1, *Initial Study Public Agency Comment Matrix*). An Initial Study was prepared to focus the environmental topic areas to be analyzed in the Draft EIR (Appendix III, *Initial Study*). The Initial Study prepared for the proposed project identified the contents of the Draft EIR, based on environmental issue areas anticipated to be potentially subject to significant impacts (Appendix III, *Initial Study*).

The Draft EIR evaluated in detail the potential effects of the project. It also analyzed the effects of a reasonable range of three alternatives to the project, including potential effects of a "No project" alternative. It also included a brief description of two alternatives that were withdrawn as being infeasible. These alternate land use alternatives were a community garden and a park or recreational use. The development of the property for such uses did not meet the basic objectives of the project to the same extent as the proposed project. Given the inconsistency that these alternate land use alternatives would have with the adopted Community Plan and existing land use designation and zoning, a detailed analysis of such uses was not completed. The Draft EIR for the project (State Clearinghouse No. 2014061030), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was completed and forwarded to the Governor's Office of Planning and Research (OPR), and a Notice of Completion (NOC) was posted at both OPR and the Office of Los Angeles County Clerk on January 22, 2015. Copies of the Draft EIR and Notice of Availability (NOA) were mailed to 350 representatives and interested parties. The Draft EIR was circulated for a 46-day public comment period beginning on January 22, 2015, which closed on March 9, 2015, beyond the 45 days required by CEQA Guidelines Section 15105(a). Although the 46-day comment period closed on March 9, 2015, at 5 p.m., the City received and accepted the submittal of thirteen (13) late letters of comment from individuals and one (1) late letter of comment from a City agency. In total, the City received seven (7) letters of comment from agencies and eight-one (81) letters of comment from individuals and organizations. Copies of the written comments received during the 46-day public review period are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The City released a Final EIR for the project on June 16, 2016, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with implementation of the project, identifies feasible mitigation measures and

alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was also made available for review on the City's website. Hard copies of the Final EIR were also made available at four libraries and the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the project site as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the project was held by the Deputy Advisory Agency on July 6, 2016.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Environmental Review Section, 200 North Main Street, Room 750, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. Findings Required to be Made by Lead Agency Under CEQA

Section 21081 of the California Public Resources Code and Section 15081 of the CEQA Guidelines require a public agency, prior to approving a project, to identify the project's significant impacts and make one or more of three possible findings for each of the significant impacts.

The three possible findings are:

A. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR (CEQA Finding 1).

B. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (CEQA Finding 2).

C. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR (CEQA Finding 3).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set forth therein. Section 15091 of the CEQA Guidelines requires findings to address environmental impacts that an EIR identifies as "significant." For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact.

2. Project Design Features – Reference to the identified Project Design Features that are a part of the project (numbering of the features corresponds to the numbering in the Draft EIR)

3. Regulatory Compliance Measures – Reference to the Identified Regulatory Compliance Measures that are a part of the project (numbering of the measures corresponds to the number in the Draft EIR)

4. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures correspond to the Mitigation Monitoring and Reporting Program, which is included as Section IV of the Final EIR).

5. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.

6. Rationale for Finding – A summary of the reasons for the finding(s).

7. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

IV. Description of the Project

A. Project Location and Surrounding Uses

The project site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. The site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food

Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

B. Existing Conditions

1. Site Improvements

The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

2. Land Use and Zoning Designation

The project site is zoned M2-2 located within the Southeast Los Angeles Community Plan area, with a Light Manufacturing land use designation that corresponds to the MR2 and M2 Zones. The purpose of the M2 zoning classification is to allow for lower-impact industrial uses such as clothing design and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales. Light industry also includes a variety of "neighborhood industrial services" that benefit from the close geographic relationship to customers, wholesalers, and related services. Such uses include animal hospitals and kennels, automobile service and painting, lumber yards and specialty construction materials. The proposed use as a light industrial park that will contain garment manufacturing and supportive uses is consistent with the Light Manufacturing land use designation and is permitted within its underlying zone.

3. Project Characteristics

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding

for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5 street widening on the north and 12.5' street widening on the south of South Alameda Street
- 22' street widening on 41st Street

Pedestrian/vehicular conflicts would be minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip.

V. Environmental Impacts Found to be Less than Significant by the Initial Study

The City Planning Department prepared an Initial Study that is located in Appendix I of the Draft EIR. In accordance with CEQA Guidelines section 15128, the FEIR described categories of potential effects that were not found to be significant and were therefore not discussed in detail in the FEIR. An Initial Study was prepared for the Project in June 2014 and is included as Appendix III in the FEIR. The Initial Study indicates why the Project's potential effects on these issues were determined not to be significant and were therefore eliminated from further consideration in the FEIR. The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed:

- Aesthetics
- Agricultural And Forest Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

A. Aesthetics

The proposed project would not result in impacts to aesthetics in relation to scenic vistas, scenic vistas within a state scenic highway, or degradation of visual character and quality, and the proposed project would result in less than significant impacts to aesthetics in relation to creation of a new source of substantial light or glare.

1. Scenic Vistas

The City of Los Angeles has not designated any scenic vistas within the proposed project area or any area that would be affected by the development of the proposed project area. The nearest unique urban or historic features within the Southeast Los Angeles Community Plan Area (CPA) include Watts Towers (located nearly 5 miles south of the proposed project site) and established historic areas along Central Avenue, north and south of Vernon (located approximately 0.75 mile west of the proposed project site). Existing buildings, trees, and infrastructure shield the proposed project site from view from these unique features.

2. Scenic Resources within a State Scenic Highway

The nearest designated historic parkway is 6 miles of Interstate Route 110 (Arroyo Seco Historic Parkway), located approximately 5 miles north of the proposed project site; the nearest officially designated scenic highway is 55.1 miles of State Route 2 (Angeles Crest Highway), located approximately 15.5 miles to the north of the proposed project site; and the nearest eligible scenic highway is Interstate Route 210 west of its intersection with State Route 134, located approximately 11 miles north of the proposed project site. The proposed project site cannot be viewed from any of these highways, due to distance.

3. Visual Character and Quality

The proposed project would replace the currently vacant and undeveloped approximately 13-acre site in a Light Industrial zone with approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space with subsequent parking lots in 37- to 40- foot-high two-story structures with surface parking. The proposed project would be similar in mass to several existing buildings in the immediate vicinity of the project site but approximately 7 to 27 feet taller than the buildings immediately surrounding the project site. However, the development of the proposed industrial park, the construction of four industrial buildings in an industrial zone, is consistent with the City of Los Angeles Municipal Code, which places no height restrictions or setbacks on industrial development within the M2 Light Industrial zone. The proposed project is consistent with the City of Los Angeles General Plan's aesthetic policies for industrial development in the Southeast Los Angeles CPA, including the design standards established for industrial development in the Urban Design Chapter of the Southeast Los Angeles Community Plan, because the proposed structures are oriented toward the main commercial street (with office space facing 41st Street and Martin Luther King, Jr. Boulevard); a landscape buffer separates the public streets from

the parking lots; pedestrian/vehicular conflicts are minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip; the buildings have been designed with windows, doors, and decorative concrete panels on the surfaces facing the street that address pedestrian scale; trash areas have been enclosed; mechanical roof equipment will be completely screened from view; and the on-site lighting is directed downward to limit the nighttime light and glare that reaches the nearby residential uses. The proposed project is also consistent with the City's policy to achieve adequate compatibility through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses because the proposed project site is not directly adjacent to a residential neighborhood or commercial use and the western facades of the proposed project that will be seen from residences are comprised of decorative concrete panels that provide a pedestrian scale. The proposed project is consistent with the City of Los Angeles General Plan and the City of Los Angeles Municipal Code for a Light Industrial zone in the Southeast Los Angeles CPA. Therefore, there would be no expected significant impacts to aesthetics related to degradation of the existing visual character of the site and its surroundings.

4. Light and Glare

The proposed project has been designed to provide on-site lighting that avoids impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed project area. The proposed project involves the construction of four industrial buildings, all of which contain shielded exterior area lighting wall packs mounted to the face of the building at 29 feet above the finished floor and solar blue reflective glazing in anodized aluminum frames. The exterior lights will contribute to sources of light and the reflective windows have the potential to contribute to a source of glare in the proposed project area. However, the exterior lights on the buildings have been designed to be shielded downward and the windows on the western face of the building have been positioned to the north of the nearest residence to reduce glare to a less than significant level. The proposed project site is currently vacant, with seventeen 24- to 30-foot-high street lamps located on the sidewalk surrounding the site that constitute existing sources of light and glare. The Metro Blue Line (located to the west of the proposed project site) and the Alameda Corridor (located to the east of the proposed project site) provide periodic sources of nighttime light and glare. The proposed project site is located in an urbanized area, and the surrounding light industrial and warehouse uses typically utilize moderate levels of interior and exterior lighting for security, parking, signage, architectural highlighting, and landscaping. The streets in the area are lined with light fixtures for visibility and safety purposes, and the high volume of truck traffic on the streets surrounding the proposed project site contributes to overall ambient lighting levels, especially from Alameda Street. As indicated in the project description, the proposed project has been designed to comply with the goals and policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan for industrial development, which include (1) the installation of on-site lighting along all pedestrian walkways and vehicular access ways and (2) the shielding and directing of on-site lighting onto driveways and

walkways, and away from residential uses. The Southeast Los Angeles Community Plan does not specify light and glare restrictions in relation to surrounding industrial uses. In order to be consistent with the policies of the City of Los Angeles General Plan, the proposed project design provides nighttime lighting for safety and includes nighttime light shielding for the nearest residence.

B. Agriculture and Forest Resources

The proposed project would not result in impacts to agriculture resources in relation to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflicts with existing zoning for agricultural use or a Williamson Act contract; conflicts with existing zoning for forest land or timberland; loss of forestland or conversion of forest land to non-forest use; or other changes that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

1. Agriculture

The proposed project site is not designated as or suitable to be designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The California Department of Conservation (CDC) Farmland Mapping and Monitoring Plan (FMMP) has identified the area as Urban and Built-Up Land at the statewide scale and the area has not been surveyed at the County scale. There are no Farmlands located in or immediately adjacent to the proposed project site. Although the proposed project site was used for urban gardens with individual plots available to the community from circa 1994 to 2006, the site was cleared of that use as a result of a court decision in 2006 upholding sale of the property to the applicant and is currently vacant land with no permanent structures or occupied uses. No agricultural uses or related operations are present within the site or surrounding area. Due to its urban setting, the site area is not included in the FMMP. The nearest agricultural land use zone within the City's jurisdiction is a cemetery located in Boyle Heights at least 2.5 miles east of the proposed project site. The proposed project site and surrounding communities are not enrolled in a Williamson Act contract. The City of Los Angeles Zoning Plan has designated all of the parcels that comprise the proposed project site as M2: Light Industrial for light manufacturing. One parcel within the Southeast Los Angeles Community Plan Area in the neighborhood of Watts is zoned for A1 agriculture, but there are no parcels in the Southeast Los Angeles Community Plan Area currently used for agriculture.

2. Forestry Resources

The proposed project site and adjacent properties have been designated as M1: Limited Industrial, M2: Light Industrial, and M3: Heavy Industrial zones. There are no forest resources located at the property, nor were such resources historically located at the property. The property has been developed since circa 1920 according to the City's Sanborn maps. The site is designated for Light Industrial use and is currently vacant.

C. Biological Resources

The proposed project would not result in impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts; species recognized by the U.S. Fish and Wildlife Service (USFWS) as federal species of concern or by the California Department of Fish and Wildlife (CDFW) as a California Species of Special Concern (SSC); locally important species; riparian habitat or other sensitive natural communities; federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; movement of any migratory fish or wildlife species or with an established wildlife corridor; conflicts with any local policies or ordinances protecting biological resources; or conflicts with the provisions of any adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Due to the lack of habitats suitable to support species listed as rare, threatened, or endangered, sensitive species, locally important species, as confirmed during a site visit, they have been determined to be absent from the proposed project site. Based on a record search and site visit, there is no riparian habitat or any other state-designated sensitive natural communities on the subject property, and there are no wetlands or other waters of the United States afforded protection pursuant to Section 404 of the Federal Clean Water Act within the subject property. Suitable habitat is not present to support wildlife movement corridors at the proposed project site. The proposed project is consistent with the applicable goals and policies of the Conservation Element of the City of Los Angeles General Plan. The proposed project site is not within the jurisdiction of any adopted or proposed HCP or NCCP.

The proposed project would result in less than significant impacts in relation to impeding the use of native wildlife nursery sites in relation to ground or shrub-nesting native birds. The applicant has agreed to remove all vegetation prior to construction during the non-breeding season (generally October 15 to February 15) to ensure that the project site does not provide suitable nesting habitat for birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA). As indicated in the project description, a qualified biologist will conduct a pre-construction nesting bird survey throughout all construction impact areas no more than 3 days prior to the initiation of construction work. If a protected native bird nest is found, all construction disturbance activities within 300 feet of the nest will be delayed until the nest is vacated and juveniles have fledged. If no native protected nesting sites are found, construction will be allowed to proceed.

D. Geology and Soils

The proposed project would not result in impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides; in relation to substantial soil erosion and loss of topsoil; or from being located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The proposed project site is situated on relatively level ground and is not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. According to the California Division of Mines and Geology (CDMG), the site is not situated within a Seismic Hazard Zone. The proposed project intends to cut approximately 3,600 cubic yards of dirt/soil, fill 4,000 cubic yards, and import and additional 400 cubic yards. All dirt/soil disturbed during excavation and grading will remain on the proposed project site. Additionally, the proposed project consists of four warehouse/industrial buildings and subsequent parking lots that will require the entirety of the proposed project site to be paved over with concrete. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems, as sewers are available for wastewater disposal at the proposed project site. Furthermore, wastewater generated by the proposed project would be treated at the Hyperion Treatment Plant (HTP) located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. The HTP currently supports wastewater from the proposed project site and would continue to do so following the development of the proposed project.

The proposed project would result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction; from being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or from being located on expansive soil creating substantial risks to life or property. The proposed project site is not located within an Alquist-Priolo Special Study Area, a Fault Rupture Study Area, a Liquefiable Area, a Potentially Liquefiable Area, or a State of California designated Seismic Hazard Zone for liquefaction hazards. The peak ground acceleration at the proposed project site is judged to have a 475-year return period and a 10 percent chance of exceedance in 50 years, and the proposed project would be developed in accordance with the requirements of the California Building Code (CBC) and the Uniform Building Code (UBC). Seismic settlement calculations conducted by Sladden Engineering indicate potential total seismic settlement of up to 0.68 inches, which are expected to be less than one-half of the total seismic settlement. Accordingly, risks associated with seismic settlement should be considered low. Subsurface investigations conducted by Sladden Engineering did not encounter groundwater within a depth of 50 feet or less. The materials underlying the proposed project site are determined to have a "very low" expansion potential.

E. Hydrology and Water Quality

The proposed project would not result in impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area, placement of structures (other than housing) within a 100- year flood hazard area, the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow. No residential uses are proposed, and the project site is not located within or near a 100-year floodplain, as indicated on the City of Los Angeles Safety Element 100-Year and 500-year Flood

Plains delineation map. The project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown by the City of Los Angeles Safety Element Inundation and Tsunami Hazard Areas map.

The proposed project site is not located within inundation and tsunami hazard areas delineated in the City of Los Angeles Safety Element. The proposed project would result in less than significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements, groundwater supplies or groundwater recharge, alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site, alteration of existing drainage patterns in a manner that would result in flooding on site or off site, exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff, substantial degradation of water quality.

1. Water Quality Standards and Waste Discharge

   The total proposed project site encompasses approximately 13 acres, and therefore, construction activities would be subject to the requirements of a NPDES Permit issued by the Regional Water Quality Control Board (RWQCB). The National Pollutant Discharge Elimination System (NPDES) General Construction Permit requires that all developers of land where construction activities will occur over more than 1 acre (1) develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. The SWPPP typically includes minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (e.g., the minimization of impervious surfaces, treatment of stormwater runoff, etc.). As described in the Initial Study (Appendix III), although the proposed project would result in a less than significant impact with regard to water quality, the project applicant has agreed to incorporate the following design measures to ensure compliance with the City of Los Angeles Green Streets Policy:

   - The project shall comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board, U.S. Environmental Protection Agency, and local agencies regarding water quality.

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

- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

- The legibility of signs and stencils discouraging illegal dumping shall be maintained.

- Materials used on-site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to: a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved and sufficiently impervious to contain leaks and spills and must have a roof awning to minimize collection of storm water within the secondary containment area.

- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department, binding to the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan (SUSMP) and/or per manufacturer's instructions.

Compliance with the requirements of the NPDES Permit and the SUSMP would ensure that the construction or operation of the proposed project would not violate any water quality or waste discharge requirements.

2. Groundwater

The proposed project would not require the use of groundwater. The increase of impervious areas resulting from the proposed project could reduce percolation, which could result in a reduction in groundwater recharge. However, compliance with City SUSMP requirements would percolate up to 0.75 inch of captured rainfall over a 24-hour period to provide additional recharge. Thus, the extent to which local groundwater supplies would be substantially depleted would be limited.

3. Drainage Patterns

There are no streams or rivers located in the immediate vicinity of the project site; however, the Los Angeles River is located approximately 1 mile east-northeast of the project site. The project site consists of an approximately 13-acre vacant lot with scattered weeds and grasses. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with the required provisions of the SWPPP would eliminate erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow some

percolation and reduction of runoff, and the increase in surface runoff would not be substantial. Under the proposed project, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow for percolation and a reduction of runoff, and the increase in surface runoff would not be substantial.

4. Runoff

Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping would allow for percolation and a reduction of runoff, and water runoff after development would not exceed the capacity of existing or planned drainage systems. In addition, with the implementation of the required SWPPP during construction and the SUSMP during project operation, any potential sources of polluted runoff would be effectively controlled. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Additionally, as described above, the proposed project has been refined to meet the City of Los Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

5. Water Quality

Project construction would occur in accordance with standard procedures established by the RWQCB. Project compliance with the City's SUSMP requirements would minimize potential water quality impacts during project operations. Furthermore, as described by Design Measures 60 through 65, the proposed project would require BMPs to minimize run-on and runoff of storm water and the potential for material spills to be transported to the storm water conveyance system. Additionally, as described in the Project Description of this Draft EIR, the proposed project has been refined to meet the City of Los Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

F. Mineral Resources

The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource and in relation to the loss of availability of a locally important mineral resource recovery site. No mineral extraction operations currently occur or have occurred on the proposed project site, and there are no active or abandoned mines or oil fields in the vicinity of the proposed project. Based on a review of the California Geological Survey (CGS), the proposed project is located within an Mineral Recovery Zone (MRZ)-2 zone. However, the property is designated for light industrial use in the Framework Element of the City General Plan. The property and much of the area in the vicinity of the proposed project was developed as industrial prior to the MRZ classification system,

thus these properties are not available for commercial mining activities. Furthermore, the proposed project, as currently proposed, will not result in a loss of soil at the proposed project site, and therefore, potential mineral resources will not be disturbed. Cut and fill is proposed to be balanced on-site; therefore, there will be no net loss of sand and gravel resources from the property as a result of construction. According to the Conservation Element of the City's General Plan, sites that contain potentially significant sand and gravel deposits, which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. The proposed property and much of the area in the vicinity of the proposed project was developed as an industrial area prior to the MRZ classification system, thus these properties are not available for commercial mining activities.

G. Noise

The proposed project would not result in impacts to noise in relation to public airports or private airstrips. There are no public airports or public use airports or private airstrips located within a 2-mile radius of the proposed project site. The proposed project would result in less than significant impacts to noise in relation to noise-related exposure or generation of noise levels in excess of established standards from the proposed project, generation of excessive ground-borne vibration or ground-borne noise, permanent increases in ambient noise levels as a result of operation of the proposed project, or temporary or periodic increases in ambient noise levels from the proposed project.

1. Construction Noise

During construction of the proposed project, sensitive receptors will be exposed to noise levels above the thresholds set forth in the City's CEQA Threshold Guide, which states that a project would have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibel (dBA) or more at a sensitive receptor. In order to ensure compliance with the City's existing noise regulation, the applicant has committed to use temporary noise barriers during outdoor construction activities. The temporary noise barrier shall be installed at the western boundary of the proposed project site, along Long Beach Avenue (Figure III.B-3, Temporary Noise Barrier). As demonstrated in the noise analysis conducted in support of the Initial Study, the use of temporary noise barriers during construction is sufficient to ensure compliance with the City Noise Ordinance. (See also Appendix IS-1, Noise Technical Report, to the Initial Study, which is Appendix III of this Draft EIR.) However, with the incorporation of a temporary noise barrier along the western boundary of the proposed project site as a project design element, the proposed project would not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus would be in compliance with the City's noise regulation.

2. Operational Noise

The proposed project's ongoing operation would require building mechanical equipment to ventilate the indoor air quality and provide power for everyday

operations. Typical mechanical equipment would include HVAC systems, transformers, and elevators. The proposed project's mechanical equipment would be designed to comply with the City's Noise Regulation requirements and a significance threshold of 5 dBA above the ambient noise levels. The greatest noise level generated by typical building equipment at a distance of 50 feet is 61 dBA, which is well below the significance threshold of 73.3 dBA. Furthermore, noise generated from mechanical equipment is generally absorbed and or sheltered by on-site structures and buildings, further reducing noise levels. Considering that the nearest sensitive receptor is 153 feet away from the proposed project site, operational noise impacts associated with mechanical equipment would be less than significant. The proposed surface parking lot on the proposed project site would generate some noise during operation of the proposed project. Potentially audible sources of noise from the surface parking lot would include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. These sources typically range from about 30 to 66 dBA and are generally short-term and intermittent. The greatest potential noise level generated by typical parking lot sources at a distance of 50 feet is 66 dBA, which is below the significance threshold of 78.3 dBA.

H. Population and Housing

The proposed project would not result in impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, or in relation to displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. There is no existing housing or housing being currently constructed within the currently vacant site; therefore, there will be no displacement of housing necessitating the construction of replacement housing. The unemployment rate is approximately 13 percent; therefore, there is sufficient local labor to satisfy employment; therefore, the proposed project would not generate a demand for additional housing in the vicinity of the proposed project. There are no people currently residing on the proposed project property. The proposed project property consists of a vacant site. The proposed project site is zoned for light industrial use and the proposed project is an industrial park that does not involve displacement of housing or people.

The proposed project would result in less than significant impacts to population and housing in relation to inducing substantial direct or indirect population growth. The proposed project will facilitate the transfer of 580 jobs from existing nearby locations and the addition of 410 jobs and is, therefore, consistent with the City of Los Angeles' intent to provide industrial job opportunities for residents through the development of a new industrial park. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences within the Community Employment Area, a 3-mile radius of the proposed project site, with priority given to qualified individuals that reside within one mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The project applicant has also entered into a local hire agreement for the operational phase of the project. Fifty-two percent of the four companies' employees will live within a 3-mile radius of the proposed project site. The Southeast Los

Angeles Community Plan, a part of the Land Use Element of the City of Los Angeles General Plan, and the City of Los Angeles Zoning Code have designated the proposed project site as light industrial land use (Zone "M2-2") and the proposed project would involve the construction of an industrial park consisting of four new buildings for warehouse and manufacturing space, parking lots for each building, and utilities. The proposed project is consistent with the City of Los Angeles General Plan's policies for industrial development in the Southeast Los Angeles CPA.

I. Public Services

The proposed project would not result in impacts to public services in relation to schools, parks, and other public facilities.

1. Schools, Parks, Libraries, and Hospitals

The proposed industrial park is a nonresidential use and would therefore not directly generate school-age children. The proposed project is an industrial park consisting of warehouse space, manufacturing space, office space, and parking lots, and it does not include the construction or expansion of residential use, and would therefore not directly generate an increase in population. It is expected that the new employees would be drawn from the existing labor force in the area pursuant to the Local Hire Agreement between Poetry, Impact, Miss Me, and Active Companies and the Coalition for Responsible Community Development and Los Angeles Job Corps. The proposed project site is vacant and zoned for light industrial use in an industrial area that is not appropriate for a park due to air quality issues. In addition, the project applicant has made a cash contribution to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located. The proposed project would not directly generate any substantial new demand for public facilities such as schools, parks, libraries, or hospitals because it would not directly generate an increase in population.

2. Fire

The proposed project would result in less than significant impacts to public services in relation to fire protection. Fire services to the proposed project site are provided by the City of Los Angeles Fire Department (LAFD). A significant impact would occur if the project required the construction of LAFD facilities to provide an engine company or truck company to serve the project site. The Los Angeles Municipal Code Section 57.09.07 establishes a maximum response distance from a fire station for an industrial use of 1 mile. Consistent with the requirements of the City General Plan, primary response to the project site would be provided by Fire Station No. 14, located 0.8 mile west of the proposed project site. Secondary responders are also located within close proximity of the project site: Fire Station No. 21, located 1.0 mile southwest of the proposed project site; and Fire Station No. 17, located 1.2 miles northeast of the proposed project site. The nearest fire station is Vernon Fire Department Fire Station No. 2, located 0.6 mile east of the proposed project site at 4305 South Santa Fe Avenue, Vernon, California 90058; however, the site is not located within the Vernon Fire Department's jurisdiction, which means the proximity of the station is only relevant in the case of a major fire in which the

LAFD may require assistance. Given the location of Fire Station 14 (within 1 mile of the proposed project site) for providing service to the proposed project, fire protection services are determined to be adequate.

3. Police

The proposed project would result in less than significant impacts to public services in relation to police protection. Police protection services to the proposed project site are provided by the City of Los Angeles Police Department (LAPD). The proposed project site is located within the Newton Division, under the jurisdiction of the Central Bureau. The site is served by the Newton Community Police Station, located at 3400 South Central Avenue, Los Angeles, California 90011, 1.3 miles west of the proposed project site address via police vehicle (distance is approximately 1.2 miles west). The crime rate in the Newton Division was 61.7 arrests per 1,000 residents in 2011, compared to 42.4 arrests per 1,000 residents citywide; and the traffic accident rate in the Newton Division was 13.9 accidents per 1,000 residents, compared to 12.0 accidents per 1,000 residents citywide. As described in the project description, the proposed project has been designed to incorporate security provisions including fencing with automatic gates, lighting at night around all four buildings, and full-time security guards to mitigate for the increased security risks. Controlled access to buildings, hired security guards, and illumination of public and semipublic spaces would minimize opportunities for criminal activity, therefore reducing the demands placed upon police protection services. The security elements of the project are consistent with the provisions of the City of Los Angeles General Plan and would not warrant the construction of a new Police Station of Substation.

4. Recreation

The proposed project would not result in impacts to recreation in relation to the increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration from the proposed project or as a result of existing recreational facilities or proposed construction or expansion of recreational facilities.

5. Use of Existing Neighborhood and Regional Parks

The impact to recreation related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration from the proposed project was avoided through a cash pledge to support maintenance and improvements to existing parks located in close proximity to the proposed project. The proposed project has the potential to result in an increase in the use of parks due to the new employment associated with the proposed project. The nearest neighborhood park (service radius: half a mile) in the City of Los Angeles to the proposed project site is Central Avenue Jazz Park, located 0.94 mile west of the proposed project site at 4222 Central Avenue, Los Angeles, California 90011. As no parks are located within a half mile of the proposed project site, the proposed project site is not served by a neighborhood park. However, according to the Southeast Los Angeles Community Plan, the Ross Snyder Recreation Center and Fred Roberts Recreation Center provide

neighborhood park services to the Southeast Los Angeles CPA. The Ross Snyder Recreation Center (11 acres) is located approximately 0.3 mile west of the proposed project site at 1501 E 41st St, Los Angeles, California 90011, and provides an artificial turf soccer field, barbecue pits, basketball courts, a baseball diamond, children's play area, picnic tables, seasonal pool, tennis courts, and volleyball courts. Additionally, the Fred Roberts Recreation Center (2.9 acres) is located approximately 0.4 mile south of the proposed project site at 4700 Honduras Street, Los Angeles, California 90011, and provides picnic tables and B-B-Q pits, basketball courts, children's play area, a community room, a soccer field, and volleyball courts.

The two nearest regional parks (larger than 100 acres) to the proposed project site are Elysian Park, located approximately 4.2 miles north of the proposed project site at 835 Academy Rd, Los Angeles, California 90012; and Earvin "Magic" Johnson Recreation Area, located approximately 5.9 miles south of the proposed project site at 905 E El Segundo Blvd, Los Angeles, California 90059.

According to the City of Los Angeles General Plan, the current population is not adequately served by the existing parks within the Southeast Los Angeles CPA, which means that a potential population increase due to the new employment associated with the proposed project would increase the park deficiency in the area. However, there are no anticipated growth-inducing impacts from the proposed project. The proposed project is not expected to significantly increase the population because it will facilitate the transfer of 590 jobs from existing nearby locations and the addition of 420 jobs under a local hire agreement for the construction and operation of the project in which future employees will be hired primarily from residences within the Community Employment Area, within a 3-mile radius of the proposed project site, with priority given to qualified individuals who reside within 1 mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Additionally, the project applicant has agreed to provide the City of Los Angeles Department of Recreation and Parks with the funds (equivalent to the provision of 2.6 acres, calculated in local Quimby fees) to dedicate park land pursuant to the 2003 settlement agreement regarding the proposed project site, which will allow the City to dedicate a park.

6. Construction or Expansion of Recreational Facilities

The proposed project is an industrial park consisting of warehouse space, manufacturing space, and parking lots, and it does not include the construction or expansion of recreational facilities. The proposed project will be partially supported through transfer of employees from local sites and expansion of employment, and therefore there is no anticipated need to construct or expand the existing recreational facilities that serve the region. The project has committed to a local hire agreement for the construction and operations phases of the project, thus resulting in a commitment that 52 percent of the employment will be composed of individuals who live within a 3-mile radius of the project. In addition, the project applicant has made a cash pledge to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the proposed project is located.

VI. Environmental Impacts Found to be Less than Significant After Mitigation

The City finds that the following environmental impacts identified in the FEIR are potentially significant but can be mitigated to a less than significant level. Other impacts set out below were determined to be less than significant, but were considered in full in the FEIR. The potentially significant impacts and the mitigation measures which will reduce them to a less than significant level are set out in the FEIR and are summarized as follows:

A. Air Quality

1. Potential Impact

As indicated in the FEIR, the proposed Project would have a significant effect on air quality for PM_{10} emissions during construction. Therefore, the proposed Project would have a significant effect on air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

2. Finding

Pursuant to Public Resources Code Section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the significant effect on air quality to a less than significant level.

3. Rationale

Construction Phase

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the proposed project site. Fugitive dust emissions would primarily result from site preparation (i.e., grading) activities, whereas NOx emissions would primarily result from delivery and hauling of construction materials and equipment, the use of heavy-duty construction equipment, and the construction workers' commute trips to and from the proposed project site. The assessment of construction air quality impacts considers each of these potential sources during each part of the construction phase. Although construction emissions can vary substantially from day to day, depending on the level of activity and the specific type of operation, and the fact that fugitive dust emissions can vary based on the prevailing weather conditions, the analysis considers a worst-case scenario with concurrent use of construction equipment to ensure that impacts are not underestimated.

The daily regional construction emissions for the proposed project were estimated using the CalEEMod, version 2013.2.2, emissions model (Table IV.B-8, Unmitigated Estimated Daily Regional Construction Emissions). The proposed project would have a significant impact on air quality for PM (Particle Matter) 10 emissions during construction. In the absence of mitigation measures, PM10 emissions would exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. All other criteria pollutants are anticipated to be below the SCAQMD significance thresholds.

The SCAQMD has adopted the following criteria for determining consistency with regional plans and the regional AQMP: (1) identifying whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and (2) identifying whether a project would exceed the assumptions utilized in preparing the AQMP.

With respect to the first criteria, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable air quality standards. As discussed in more detail above, the proposed project would result in construction-related PM10 emissions that exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. However, with respect to construction related emissions, these emissions would be temporary in nature, lasting only for the site preparation/grading/excavation phases (approximately 3 months), and would not have a long-term impact on the region's ability to meet state and federal air quality standards. In addition, the proposed project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the proposed project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting SCAQMD rules and regulation, the proposed project's construction activities will be consistent with the goals and objectives of the 2012 Final AQMP to improve air quality in the Basin.

With regard to the second criterion, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. According to the Population and Housing section of the Initial Study prepared for the proposed project (Appendix III), the proposed project will be transferring 580 jobs from existing nearby locations, and adding approximately 400 new jobs, which is consistent with the City's Southeast Los Angeles Community Plan. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences with the Community Employment Area, a 3-mile radius of the proposed project site, with priority given to qualified individuals that reside within one mile of the proposed project. Therefore, the proposed project is not anticipated to induce substantial population growth in the vicinity of the proposed project site, and would be consistent with both the SCAG and AQMP growth projections.

As was discussed in the Draft EIR, the proposed project's construction emissions from PM10 would exceed the SCAQMD's significance threshold by approximately 5.6 pounds per day. Therefore, the proposed project would have a significant impact to air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

The greatest potential for toxic air contaminant (TAC) emissions during construction would be diesel particulate emissions associated with the use of heavy-duty equipment during construction activities. TAC emissions associated with

construction of the proposed project have been analyzed by using the standard health risks assessment methodology to determine "Individual Cancer Risk" of a person continuously exposed to TACs over a 70-year lifetime.

The Office of Environmental Health Hazard Assessment (OEHHA) has developed a methodology for estimating health risks from TAC pollutants such as diesel exhaust from construction equipment. OEHHA has developed a DPM inhalation non-cancer (long-term) reference exposure level (REL) of 5 micrograms per cubic meter (µg/m3). No non-cancer acute (short-term) REL has been established for DPM.

Although a cancer risk factor has been established for DPM, the OEHHA HRA cancer risk factors assume a continuous exposure over a 70-year timeframe. Because the construction schedule estimated that the phases which require the most heavy-duty diesel equipment usage, such as site grading and excavation, would last for a much shorter duration (i.e., approximately 3 months), construction of the proposed project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance document does not recommend an HRA for short-term construction emissions. Therefore, the HRA is not meaningful to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, there would be no residual emissions after construction and no corresponding individual cancer risk. As such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and project-related TAC emissions impacts during construction would be less than significant.

During the proposed project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finished, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113, Architectural Coatings, limits the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. Although these odors could be a source of nuisance to adjacent uses, they are temporary and intermittent in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, impacts associated with objectionable odors during construction would be less than significant.

Operational Phase

Operation and maintenance emissions at the proposed project site are likely to result from energy consumption and on-road mobile sources associated with employee commutes and delivery of manufactured goods. Additionally, operational emissions will be generated from area sources including consumer products that contain solvents, landscaping that uses fuel-powered equipment, and on-site emergency generators.

Operation of the proposed project would not introduce any substantial new on-site sources of air pollution. As is indicated in Table IV.B-9, the proposed project is expected to generate daily emissions of criteria pollutants well below the SCAQMD

significance threshold. As such, no mitigation measures related to air quality are required for operation of the proposed project. It is also important to note that the estimated emissions are likely to be higher than actual emissions from the proposed project due to the conservative assumptions used for emission modeling.

Cumulative Impacts

SCAQMD's methodological framework was used to assess the proposed project's cumulative impacts. In order to assess cumulative impacts based on the AQMP's forecasts of attainment of ambient air quality standards set forth in the Federal and State Clean Air Acts, this methodological framework takes into account forecasted regional growth projections from SCAG. Cumulative development can affect implementation of the AQMP. The 2012 AQMP was prepared to accommodate growth, to reduce pollutants within the SCAQMD portion of the SCAB, and to minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the SCAB is within the projections for growth identified by SCAG, implementation of the 2012 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant.

Since the proposed project would not induce substantial population growth and would be consistent with the growth projections anticipated by SCAG (as further discussed in the Population and Housing section of the previously prepared Initial Study [Appendix III]), the proposed project would be expected to result in a less than significant cumulative air quality impact in relation to consistency with the AQMP.

However, it was determined that there are 11 projects that could affect the cumulative impact analysis of the proposed project that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a nonattainment area. As discussed above, emissions during construction of the proposed project as analyzed in this Draft EIR would be reduced to below the level of significance with the implementation of mitigation measures MM-1 through MM-7. Therefore, implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

4. Mitigation Measures

Air-1: During the construction phase of the project, the oject applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent,

clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned

external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

5. References

DEIR, at pp. IV.B-1 – IV.B-24; DEIR, Appendix V; FEIR, Response to Comment Nos. E2, E6, E7, E10, E11, E13, E14, E21, E39, E43, E44, E46, E52, E54, E58, E62, E67, E68, E71, E72, E79, E81.

B. Cultural Resources

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on paleontological and archaeological resources during construction.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on paleontological and archaeological resources to a less than significant level.

3. Rationale

Paleontological Resources

The Vertebrate Paleontology section of the Natural History Museum of Los Angeles County performed a paleontological collections records search to locate fossil localities within and in the immediate vicinity of the proposed project site. No fossils localities have been reported within the boundaries of the project

site.22 However, museum records indicated that at least six fossils localities (LACM [Los Angeles County Museum] 1755, LACM 3363, LACM 6204, LACM 7701, LACM 7702, and LACM 7758) yielding vertebrate specimens that have scientific importance have been documented in the vicinity.

The paleontological record search indicated that there were no new paleontological resources and/or unique geological features located within the project area. LACM characterization of the project area suggest that surface grading or shallow excavations in the younger Quaternary deposits typically do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils. Therefore, grading and excavations at depths greater than 5 feet may expose and/or damage potentially significant fossils.

The proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium underlain by older Quaternary Alluvium. The older Quaternary Alluvium deposits have moderate sensitivity for paleontological resources and, therefore, have the potential to reveal important vertebrate fossils that can contribute to the life history of the area. Excavations (at 5 feet or more) may encounter previously undisturbed native soils and may have the potential to encounter paleontological resources within these older deposits. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource (at depths greater than 5 feet), thus requiring the consideration of mitigation measures.

There are no unique geological features currently identified within the proposed project boundary; therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature.

Archaeological Resources

The SCCIC conducted a records search for the project site and adjacent surrounding properties and CRHR/NRHP listed and eligible for listing historic properties.24 Native American coordination was also conducted through the NAHC in 2007 and 2013, which consisted of a Native American Sacred Lands Search to identify Native American burials and/or Native American cultural resources within the proposed project site. No California Historical Landmarks (CHLs) are involved with the project, nor does the proposed project site include any California Points of Historical Interest.

The results of the SCCIC record search indicated that 25 cultural resources studies have been conducted with a 0.5-mile radius of the proposed project (Appendix VI, Addendum to the Cultural Resources Technical Report). Of these, 5 previous studies occurred within the proposed project, and 20 studies are adjacent to the proposed project area. A total of 45 cultural resources have been previously recorded within a 0.5-mile radius of the proposed project area. Five resources (P-19-003069, P-19-003070, P-19- 003889, P-19-186110, and P-19-

187085/Mojave Road) have been documented within the project area (Table IV.C-1, Prehistoric and Historic Archaeological Sites Located within the Project Area). One resource, P-19-187085/Mojave Road, has portions that have been found to be eligible or eligible for listing on the CRHR and/or NRHP. Another resource located adjacent to the proposed project, P-19- 186110/Hobart Station, has been found to be eligible for listing on the CRHR and/or NRHP. Additional analyses of historic maps found that the proposed project area contained historic structures as late as 1928, although none remains today.

In 2007 and 2013, the NAHC was contacted to perform a search of the Sacred Lands Field (SLF) of the project area. The SLF resulted in negative findings for Native American cultural resources within the proposed project area.26 In 2007, SWCA Environmental Consultants conducted a Phase I Pedestrian Survey, which resulted in the discovery of one multicomponent archaeological site consisting of both historic and prehistoric materials. The site was given the designation P-19-003889 by the SCCIC and was formally recorded on State of California Department of Parks and Recreation (DPR) 523 series forms. The field survey recovered a total of 15 diagnostic and/or noteworthy artifacts located at 12 different locations on the surface of the project. Of these, 11 artifacts were classified as historic, 1 as prehistoric, 1 as modern, and 2 as pestles of undetermined age.

The record search results indicate the presence of previously recorded buried archaeological features (below 1 meter) adjacent to the project area (ex. privy). Phase II testing conducted in the project area in 2007, within the project area, represents a limited sample; therefore, archaeological materials and/or features could be present. Therefore, there remains a possibility that buried archaeological materials or intact features from P-19-003889 could be present.

The proposed project has the potential to result in significant impacts to cultural resources related to a substantial adverse change in the significance of prehistoric or historic archeological resources. Previous subsurface testing within the project area and adjacent to the project identified the presence of historic period archaeological materials and features. Although the findings within the project area were not considered eligible or unique archaeological resources, the testing only sampled the project area; therefore, the potential remains for previously undiscovered buried archaeological resources to be present within the project area. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique archaeological resource below the surface, therefore requiring the consideration of mitigation measures.

Historical Resources

There are no identified historical resources present within the proposed project. One resource, P-19- 187085/Mojave Road, has been noted to pass through the proposed project; however, no evidence of the road currently exists. SWCA Environmental Consultants conducted a Phase II Testing program of P-19-003889. The testing program involved the placement of 10 shovel test pits (STPs) in a grid pattern throughout the project area to depths ranging from 20 to

90 centimeters below the surface. Nine of the 10 STPs contained cultural materials, which consisted entirely of historic period artifacts. No prehistoric artifacts were observed within the 10 STPs. The historic materials recovered at P-19-003889 did not identify any intact subsurface cultural deposits or features; therefore, the site is not recommended eligible for listing under any criteria for the CRHR (CEQA Section 15064.5(a)(3)(A-D)) and as such is not considered significant under CEQA. Therefore, the proposed project would have less than significant effects with respect to historical resources.

Human Remains

Reviews of historic maps, along with the results of the records search with the NAHC, indicate that there are no known Native American or historic period cemeteries, nor known informal Native American burials, within the proposed project site. The NAHC was requested to conduct an updated search from their Sacred Lands File for the presence of Native American sacred sites or human remains within the project study area. A written response was received by Sapphos Environmental, Inc. on December 30, 2013,27 indicating that the SLF failed to identify the presence of Native American sacred lands or traditional cultural properties within the project area.

The proposed project is not expected to directly or indirectly disturb human remains, including those interred outside of formal cemeteries. There are no formal cemeteries on the property. The results of the archaeological record search, review of historic maps, and the NAHC SLF search,28 indicate that no historic period or Native American burial grounds are located within the proposed project site. Although there are no known burial sites within the proposed project site, the discovery of human remains is always a possibility. Should human remains be encountered as a result of project related activities, the project will be subject to Section 7050.5 of the Health and Safety Code. In this event, the Los Angeles County Coroner will be notified within 24 hours of the discovery of human remains, excavation in the area of the remains will be halted, the Coroner will determine the nature of the human remains as archaeological or modern, and if the human remains are identified as prehistoric Native American, the Coroner will contact the NAHC and provide notification of the discovery of Native American human remains. Therefore, the proposed project would not result in impacts to cultural resources relating to the disturbance of human remains, including those interred outside of formal cemeteries.

Cumulative Impacts

The incremental impact of the proposed project on paleontological resources, archaeological resources, historical resources, and human remains would be less than significant. There are no expected impacts to paleontological resources, as mitigation measures are required to reduce impacts to the older Quaternary Alluvium deposits present at the proposed project site to below the level of significance. There are no unique geological features on the proposed project site; therefore, there would be no expected impacts related to the destruction of a unique geologic feature. The potential to yield archaeological

resources exists on the proposed project site, which constitutes a significant impact requiring the consideration of mitigation measures. There are no known burial sites within the proposed project site; therefore, there would be no expected impacts related to the disturbance of human remains.

4. Mitigation Measures

Cultural-1: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed Project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- Paleontological Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or farther and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data. All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Cultural-2: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

- A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

- Cultural Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of archaeological material, sketches of recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

5. References

DEIR, at pp. IV.C-1 – IV.C-15; DEIR, Appendix III/Appendix IS-2 and Appendix IS-3; DEIR, Appendix VI.

C. Greenhouse Gas Emissions

1. Potential Impact

The Project will have a less than significant effect on greenhouse gas emissions.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project's global climate change impacts were analyzed quantitatively considering the construction and operational scenario, size, and location of the proposed project. To quantify the amount of GHG emissions contributed by construction and operation of the proposed project, the CalEEMod emissions model and the California Climate Action Registry's General Reporting Protocol were used. The proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project conflicts with the goal of reducing California's GHG emissions to the 1990 levels (427 million metric tons CO2e, which is equivalent to approximately 10 tons CO2e per capita) by 2020 as required by AB 32. Additionally, based on the suggested thresholds proposed by the CAPCOA, the proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project emits more than 25,000 metric tons of CO2e per year.

Based on emissions modeling, unmitigated construction activities would result in the emission of a maximum of approximately 643.22 metric tons of CO_{2e} (Table IV.D-3, Unmitigated CO_2 and CO_{2e} Emissions). Operation of the proposed project would result in the emission of approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 365,945 square feet of warehouse space. The proposed project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO_{2e} per year, thus not requiring the consideration of mitigation measures.

As a central component of the CEQA Guidelines, there is substantial evidence to support compliance with the Los Angeles Green Building Code (LAGBC) is qualitatively consistent with applicable statewide, regional, and local goals and policies in place for the reduction of GHG emissions. In order to implement the City's Green LA goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC applicable to new development projects. As it relates to new development, the City adopted the LAGBC Ordinance No. 181480, which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City. The proposed project is defined as a "newly constructed nonresidential" pursuant to the LAGBC. The following is a list of mandatory measures within the LAGBC that would have the effect of reducing the project's direct GHG emissions:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15

percent. • 99.05.210.1. ENERGY STATE Equipment and Appliances. Residential grade equipment and appliances provided and installed shall by ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.

- 99.05.211.4. Prewiring for Future Electrical Solar System: Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.

- 99.05.303.2 Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.

- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

Through implementation of mandatory measures outlined in the LAGBC, the proposed project would be consistent with AB 32, the SCAG RCP, the City of Los Angeles General Plan, and the Los Angeles Climate Action Plan. Therefore, the proposed project would have a less than significant impact on GHG emissions in relation to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.

Cumulative Impacts

It was determined that there are 11 projects that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site (Figure II.B-1, Related Projects, Table III.B-1, Related Projects), but for the purposes of GHG emissions, there are many more projects in the County, the State, and worldwide that would contribute to cumulative global GHG emissions. Due to the fact that the proposed project would be implementing mandatory measures outlined in the LAGBC for "newly constructed nonresidential," the proposed project would be consistent with all applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Additionally, all of the related projects are consistent with the LAGBC guidelines and therefore do not constitute a significant impact on GHG, as they are achieving per capita reductions laid out in the Citywide plan. Furthermore, the proposed project is relocating current operations to a centralized location along the Alameda Corridor with immediate access to rail lines and major interstates and highways, which greatly minimizes mobile emissions that are typical for a project of this type. Therefore, the sizeable percentage of operational GHG emissions associated with the proposed project should not necessarily be considered new emissions attributable to the proposed project because the future employees of

the project already generate emissions through their current operations. Thus, when analyzed in conjunction with related past, present, and reasonably foreseeable future projects, the proposed project's cumulative impact in relation to GHG emissions and global climate change is less than significant.

4. Mitigation Measures

As discussed above, the proposed project's construction and operational emissions are not expected to exceed the recommended CARB threshold of 25,000 metric tons of CO2e per year. Additionally, with the incorporation of mandatory measures outlined in the LAGBC, the impacts related to GHG emissions would be less than significant, not requiring the consideration of mitigation measures.

5. Level of Significance After Mitigation

There are no significant impacts in regard to greenhouse gas emissions that would require the implementation of mitigation measures.

6. References

DEIR, at pp. IV.D-1 – IV.D-13; DEIR, Appendix IV; FEIR Response to Comment Nos. E7, E46, E62, E67.

D. Hazards and Hazardous Materials

1. Potential Impact

The Project will have a less than significant effect on hazards and hazardous materials.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project site is currently vacant, and there is currently no transport, use or disposal of hazardous materials related to the property. The historic uses of the proposed project site that may have involved the transport, use, or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products The proposed project site is currently vacant and there is no expected potential for the release of hazardous materials. The historic uses of the proposed project site that may have involved the transport, use or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products manufacturing. The results of several surface and subsurface investigations conducted at the proposed project site indicated that the

concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) were generally below regulatory limits for commercial land use. Elevated concentrations of certain metals (primarily lead and arsenic) were detected in a limited number of samples, but in no discernible pattern. Based on the analytical results, the available data do not indicate any significant release of contamination to the Property.

An HHSE was performed for the subject property (Appendix VIII). The HHSE was performed to evaluate whether constituents of potential concern (COPCs) were present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future industrial land uses.

Several Phase I and Phase II environmental site investigations have been performed on the subject site from 1995 to 2013. Reports of these investigations were reviewed to develop a conceptual site model, to identify COPCs, and to identify appropriate exposure point concentration estimates for the health screening evaluation. The reports reviewed included:

- Phase I Environmental Site Assessment, June 2013. Prepared by SCS Engineers.
- Soil Vapor Survey, March 2011. Prepared by SCS Engineers.
- Preliminary Risk Assessment, 31 May 2007. Prepared by PSI.
- Hexavalent Chromium Analysis, 3 November 2006. Prepared by PSI.
- Site Investigation Report – Lancer Site, 29 October 2003. Prepared by Pacific Edge Engineering, Inc.
- Phase II and Limited Phase III Environmental Site Assessment, 9 October 2006. Prepared by PSI.
- Phase I Environmental Site Assessment, 1 September 2006. Prepared by Professional Service Industries, Inc. (PSI).
- Phase I/II Environmental Site Assessment, 25 May 2006. Prepared by Advantage Environmental Consultants, LLC.
- Preliminary Health Risk Evaluation – Lancer Site, 18 January 1995. Prepared by Hart Crowser, Inc.

Collectively, these reports provide a representative summary of environmental conditions on the subject site.

Based on the HHSE, understanding the regulatory points of departure for risk management, a cumulative cancer risk of 1×10^{-6} indicates that there may be one additional case of cancer for every 1,000,000 people in a population exposed to the COPCs and under the exposure conditions identified in the human health screening evaluation. To put this cancer risk in perspective, the background rate of cancer in the United States is about 1 in 3.16 Therefore, of the roughly 300,000,000 citizens of the United States, 100,000,000 can expect to develop some form of cancer at some time in their lives. If the entire population of the United States were to reside on a site where, due to chemical

contamination, the excess lifetime cancer risk was 1×10^{-6}, then an additional 300 individuals might develop some form of cancer as a result, and the total number of cancer cases would be 100,000,300. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light industrial warehouse uses to the south and industrial uses and residential areas to the west across Long Beach Avenue. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly west of the proposed project is the Metro commuter light rail line, which separates the industrial zone of the project area with small lot single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity. Given the industrial nature of much of the surrounding area, the presence of hazardous materials is likely on some of the adjoining sites. However, no recognized environmental conditions were observed.

Cumulative Impacts

The proposed project does not create hazards or generate hazardous wastes. It was determined that there are three projects occurring within the vicinity of the proposed project site that are anticipated to be implemented within the construction period of the proposed project (Table II.B-2, Related Projects). The proposed project does not generate hazards or hazardous wastes. The related projects do not have the potential to generate hazards and hazardous wastes. The related projects are far enough away or do not generate COPCs that would have the potential to contribute to cumulative impacts that would pose a risk or hazard to people or property when evaluated with the related projects.

Because the proposed project does not generate hazards or hazardous wastes, it will not contribute to significant cumulative impacts when added to related past, present, or reasonably foreseeable, probable future projects.

4. Mitigation Measures

None required

5. Level of Significance after Mitigation

There are no significant impacts requiring the consideration of mitigation measures. For seven of the eight thresholds related to hazards and hazardous materials, there are no impacts. With respect to the four CPOCs, there are no anticipated significant impacts, and no mitigation is required. There are no significant and unavoidable impacts related to hazards or hazardous materials.

6. References

DEIR, at pp. IV.E-1 – IV.E-11; DEIR, Appendices VII and VIII; FEIR, Appendices D through N; FEIR, Response to Comment Nos. B2, E7, E10, E11, E46, and E48.

E. Land Use and Planning

1. Potential Impact

The Project will have a less than significant effect on land use planning.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

As documented in the Initial Study, the proposed project would not result in significant impacts in relation to land use and planning through the physical division of an established community. The proposed project site is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance and is located in an area developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor is located directly to the east of the proposed project site and runs below-grade in the project area. All proposed development associated with the proposed project would occur within the boundaries of the proposed project site as it currently exists and would not require an alteration of the existing transportation infrastructure. Additionally, the proposed project would not result in the closure of any existing pedestrian routes. The proposed project is located in a manner that is compatible with the existing community and would not cause a physical division within the established community. Therefore, the proposed project would not result in direct, indirect, or cumulative significant impacts to land use and planning in regard to physical division of an established community, and no mitigation measures are required.

The proposed project would not be expected to result in significant impacts to land use and planning in relation to a conflict with adopted or proposed land use plans, policies, or regulations. However, the City of Los Angeles Department of Public Works Bureau of Sanitation has requested that the design of the proposed project be refined to comply with the City of Los Angeles Green Streets Policy, which is still being developed to incorporate green street BMPs into City approved construction details. During the NOP scoping period, the City of Los Angeles Department of Public Works Bureau of Sanitation requested a revision to the proposed project's street plans to meet the City's Green Streets Policy requirements.

As currently proposed, the proposed project consists of four buildings with approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space with associated on-site surface parking. The proposed project meets the Southeast Los Angeles Community Plan's minimum requirements for a landscaping buffer and will incorporate the City of Los Angeles' proposed Green Streets policy BMPs in the landscape planters or adjacent sidewalk. The proposed project is located in an area that is almost exclusively developed with light and heavy industrial uses. Additionally, the proposed project is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance, which allows for lower-impact industrial uses such as clothing and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales.

Furthermore, the Southeast Los Angeles Community Plan states that industrial land uses within the Community should be preserved and/or redeveloped to accommodate emerging technologies, thus providing an enhanced job base for the Community's population. Due to the nature of the proposed project, the proposed project would be compliant with the Los Angeles Zoning Ordinance, and consistent with the Southeast Los Angeles Community Plan. Moreover, by developing the proposed project along the Alameda Corridor, the proposed project would be consistent with the RTP and RCP by placing an industrial/warehouse land use along the 20-mile-long rail cargo expressway linking the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles.26, 27 Therefore, the proposed project would not result in significant impacts to land use and planning, and no mitigation measures are required.

As documented in the Initial Study, the proposed project would not result in impacts to land use and planning in relation to a conflict with any applicable habitat conservation plan or natural community conservation plan. The proposed project site is not located within an NCCP designated or proposed for designation by CDFW. Additionally, the proposed project site is not located within an HCP designated, or proposed for designation, by USFWS. Therefore, there are no impacts to land use and planning related to a conflict with any adopted habitat conservation plan or natural community conservation plan, and no mitigation measures are required.

Cumulative Impacts

The incremental impacts of the proposed project to land use and planning, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Table II.B-1, Related Projects, would not be expected to be significant. The vacant project site is designated as Light Industrial according to the Southeast Los Angeles Community Plan of the City's General Plan and designated as "M2-2" Light Industrial Zone according to the City of Los Angeles Zoning Ordinance and therefore meets the City's planning objectives within the Alameda Corridor. Therefore, the proposed project would not result in cumulative impacts to land use and planning, and no mitigation measures are required.

4. Mitigation Measures

None required.

5. References

DEIR, at pp. IV.F-1 – IV.F-10; FEIR, Response to Comment Nos. E7, E36, E46, E52, E54, E63, E67, E71, E80.

F. Utilities and Service Systems

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on the capacity of the City's sewer system.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on the capacity of the City's sewer system to a less than significant level.

3. Rationale

As a result of letters of comment received by the City of Los Angeles (City) during the scoping period, the City determined that the proposed 4051 South Alameda Street Project (proposed project) may have the potential to result in significant impacts related to utilities and service systems. Therefore, this issue has been carried forward for detailed analysis in this Draft EIR. This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to utilities and service systems as a result of the proposed project.

The potential for the proposed project to result in significant impacts to utilities and service systems at the proposed project site was evaluated with regard to the jurisdictions and public services provided by the Los Angeles Regional Water Quality Control Board (RWQCB), City of Los Angeles Department of Water and Power (LADWP), Los Angeles Bureau of Sanitation, California Senate Bills (SBs) 610 and 221, California Integrated Waste Management Act, and California Solid Waste Reuse and Recycling Act, based on a construction scenario provided by the construction contractor, a site plan provided by the proposed project applicant, and engineering calculations provided by Gilbert Engineering (Appendix X).

Impact Analysis

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to utilities and service systems.

(a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

The proposed project would result in less than significant impacts to utilities and service systems in relation to exceeding wastewater treatment requirements of the Los Angeles RWQCB. As discussed above, the wastewater from the proposed project would be serviced by HTP, which is located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. HTP has a design capacity of 450 mgd and currently treats an average of 362 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater 5 miles offshore. The remaining capacity of HTP is, therefore, approximately 88 mgd or 19.5 percent of its total capacity. Most of the effluent from HTP is discharged into the Santa Monica Bay through a 5-mile ocean outfall, while approximately 50 mgd of secondary effluent is recycled on-site or transported to the West Basin Municipal Water District Water Recycling Plant for use by local industries.

Considering that more than 75 percent of the proposed project is dedicated to warehouse space (approximately 365,945 square feet) with 17 percent (approximately 85,181 square feet) dedicated to office space and only 8 percent (approximately 29,896 square feet) being dedicated to manufacturing space, the proposed project site would not generate sewer flows that would contain constituents that would jeopardize the ability of HTP to operate within its established wastewater requirements. As with all wastewater treated by HTP, wastewater from the proposed project would be treated according to the treatment requirements enforced by the NPDES permit authorized by the Los Angeles RWQCB. Therefore, the proposed project would not result in significant impacts to utilities and service systems and no further analysis related to exceeding wastewater treatment requirements is warranted.

(b) Would the project require or result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?

The proposed project would not result in impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges. Based on the estimated flows, the Bureau of Sanitation has

determined that the sewer system may be adequate. However, additional analysis has indicated that the estimated flow will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 201614 (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and final approval for sewer capacity and connection permit will be made at that time.

Wastewater from Building #1 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under Martin Luther King Jr. Blvd from the north with an expected flow of 53,760 gallons per day (GPD), which is far less than the 198,599 GPD gauged capacity by the City. Also, there are two existing laterals at the 10-inch sewer under Long Beach Avenue, with an expected flow of 25,440 GPD which is far less than the 394,453 GPD gauged capacity by the City. Wastewater from Building #2 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under East 41st Street, with an expected flow of 20,160 GPD, which is far less than the 294,000 to 427,000 GPD gauged capacity by the City. Wastewater from Building #3 would enter the sewer infrastructure from two new laterals under Martin Luther King Jr. Blvd, with an expected flow of 32,640 gallons per day, Wastewater from Building #4 would enter the sewer infrastructure from two new laterals under East 41st Street.

The proposed project area will be serviced by HTP, which has a design capacity of 450 mgd and treats an average of 362 mgd. Furthermore, in November 2006, the Los Angeles City Council approved the Integrated Resources Plan (IRP), which accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP addresses increases in wastewater flows through improvements, additions, and expansions within the HTP service area. These improvements would increase the capacity of the HTP service area to 570 mgd, consisting of HTP's capacity of 450 mgd, TWRP's new capacity of 100 mgd, and LAGWRP's capacity of 20 mgd.14 As of today, all projects have been completed within treatment plants and sewer lines, and additional ongoing improvements have been proposed in order to continually provide services to meet wastewater needs for the City. Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects, and no further analysis is warranted.

(c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

The proposed project would result in less than significant impacts to utilities and service systems in relation to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts. As currently proposed, the proposed project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the proposed project would construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. However, the proposed project site would continue to drain into existing City storm drain infrastructure, and runoff from the proposed project site is estimated to be 1.03 cubic feet per second (cfs) and is not expected to exceed the capacity to existing or planned stormwater drainage systems.

Therefore, the proposed project would not result in significant impacts to utilities and service systems, and no further analysis related to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts, is warranted.

(d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

As documented in the Initial Study (Appendix III), there are no impacts from water supplies to accommodate the project's existing entitlements and resources needs. No further analysis is warranted.

(e) Would the project 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 conditions?

As documented in the Initial Study, there are no impacts with wastewater treatment provider's capacity to accommodate the project's demand, and no further analysis is warranted.

(f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

As documented in the Initial Study, there are no impacts with landfill capacity to accommodate the project's solid waste disposal needs, and no further analysis is warranted.

(g) Would the project comply with Federal, State, and Local statutes and regulations related to solid waste?

As documented in the Initial Study, there are no impacts with the project's complying with Federal, State, and Local statues and regulations related to solid waste, and no further analysis is warranted.

4. Mitigation Measures

Utilities-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

5. References

DEIR, at pp. IV.H-1 – IV.H-10; FEIR, at pp. IV-18-IV-20; FEIR, Appendix P; FEIR, Response to Comment Nos. B3, D1, D2, and E46.

6. Level of Significance After Mitigation

Implementation of the proposed project has the potential to result in significant impacts to Utilities and Service Systems. For four of the seven thresholds related to utilities, the analysis contained in the Initial Study determined that there are no impacts. This Draft EIR analysis addressed comments related to demand and capacity related to sewer and storm water for the proposed project site and provides substantial evidence that there are less than significant impacts. However, the City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections, as a means of avoiding impacts to the public sewer system. Implementation of mitigation measure Utilities and Service Systems-1 would avoid impacts to the public sewers, and ensure that impacts during operation of the proposed project are reduced to below the level of significance.

VII. Effects that will Remain Significant Despite Imposition of all Feasible Mitigation Measures

The City finds that the following environmental impacts identified in the FEIR are potentially significant. Mitigation has been identified that will reduce the impact to the extent feasible; however, there is no feasible mitigation that will completely eliminate that significant impact. The potentially significant impacts and the mitigation measures which will reduce them to the extent feasible are set out in the FEIR and are summarized as follows:

A. Transportation / Traffic

1. Potential Impacts

The proposed Project would result in significant impacts to transportation and circulation at the intersection of Alameda Street/Washington Boulevard.

2. Finding

Pursuant to CEQA section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate this effect to the extent feasible. Specific economic, legal, social, technological or other considerations, including considerations for the provision of employment opportunities, make infeasible any other mitigation measures or alternatives identified in the FEIR. As explained in Section IV, below, specific overriding economic, legal, social, technological, and other benefits of the Project outweigh this significant effect on the environment.

3. Rationale

In order to assess future operating conditions both with and without the proposed project, existing traffic conditions within the proposed project study area were evaluated. The proposed project site is located approximately one mile to the south of Interstate 10 and approximately 2.15 miles to the east of State Highway 110. Major east-west regional access to the proposed project site is provided by Vernon Avenue, while the major north-south regional access is provided by Alameda Street and Long Beach Avenue. The proposed project would provide four full-access driveways on 41st Street and four full access driveways on Martin Luther King Jr. Boulevard. Table IV.G- 1 of the Draft EIR, Access Driveway Conditions, provides a brief description of the existing roadways that comprise the circulation network of the proposed project study area, providing the majority of both regional and local access to the proposed project site.

For the purpose of evaluating existing operating conditions as well as future operating conditions with and without the proposed project, the study area was carefully selected in accordance with local traffic study guidelines. Manual turning movement counts for the selected intersection were collected in the field for the morning and evening peak periods during the month of September 2012. As requested in letters of comment received by the City from Caltrans in response to the scoping notice for the EIR, traffic counts at critical locations were updated in September 2014. The intersections were counted during the peak hours of 7:00 to 10:00 a.m. and 3:00 to 6:00 p.m. It was determined that nine key intersections would be analyzed for the project study area (Figure IV.G-2, Existing Lane Configurations at Key Intersections):

- Alameda Street and 41st Street
- Alameda Street and Vernon Street
- Alameda Street and 24th Street
- Alameda Street and Washington Boulevard
- Long Beach Avenue and 41st Street
- Long Beach Avenue and Vernon Street
- Long Beach Avenue and 24th Street
- I-10 Freeway Eastbound Off-ramp and Alameda Street
- I-10 Freeway Westbound Off-ramp and Alameda Street

Existing traffic conditions for 2014 were evaluated using the Critical Movement Analysis method (also known as Transportation Research Board's Circular 212 Planning Analysis Method). All the study intersections are currently operating at a Level of Service (LOS) D or better (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. and p.m. peak hours.

As a response to comments provided by Caltrans during the scoping period for the EIR, the intersections of the I-10 Eastbound and Westbound off-ramps at Alameda Street were included in the analysis. A freeway segment analysis requirement was assessed using Caltrans procedures to determine if freeway segment impact analysis is required for the project. The number of lanes on the I-10 Freeway is five per direction on the east as well as west of Alameda Street. The capacity of a freeway lane is 2,000 vehicles per hour; therefore, the capacity of these freeway segments is 10,000 vehicles per hour for each direction. The existing I-10 Freeway segments in the study area are operating at LOS F. The criteria for impact analysis of a freeway segment are defined as increase in trips by project by 1 percent or more of capacity (i.e., 100 trips) at LOS E or F. As shown in the table, the project will add a maximum of 29 trips to I-10 Freeway traffic volume, less than 100 trips during the peak hours. Therefore, the freeway segment impact analysis per Caltrans methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway segments.

A freeway off-ramp analysis requirement was assessed using Caltrans procedures to determine if freeway off-ramp impact analysis is required for the project. The number of lanes on the I-10 Freeway Eastbound and Westbound Off-Ramp at Alameda Street is two and three, respectively. The capacity of a freeway off-ramp lane is 1,500 vehicles per hour; therefore, the capacity of these freeway off-ramps is 3,000 and 4,500 vehicles per hour, respectively. The criteria for impact analysis of a freeway off-ramp are defined as increase in peak hour trips by project by 1 percent or more of off-ramp capacity at LOS E or F, and 2 percent or more of capacity at LOS D. The existing I-10 Freeway off-ramps at Alameda Street are operating at LOS C or better. The impact thresholds are 60 trips at 2 percent of ramp capacity. The project will add 41 total trips to the off-ramps of I-10 Freeway at Alameda Street during the a.m. peak hour, and this off-ramp volume from the project does not exceed the criteria for off-ramp analysis. Therefore, the freeway off-ramp impact analysis per Caltrans methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway off-ramps in the study area.

The proposed project was originally analyzed by the City of Los Angeles Department of Transportation (LADOT) in November 2012. The original analysis was based on the construction of a warehouse facility with four units, each providing 120,000 square feet of gross floor area for a total of 480,000 square feet gross floor area including ancillary office spaces.13 In January 2013, the proposed project was modified to include approximately 17,219 square feet, and the traffic analysis was reviewed by the traffic engineer and updated. The LADOT analysis indicated that there would be no change in the future 2014 LOS of the study intersections as a result of the project. The proposed project was

analyzed again by LADOT in October 2013 to address inclusion of 29,896 gross square feet of manufacturing use.

In response to comments received during the scoping period for the EIR, new traffic counts were performed at three of the critical intersections out of the seven original intersections to provide updated data to characterize 2014 baseline conditions and projected further 2016 baseline conditions (Appendix IX). The three critical intersections were selected for updated counts because of their proximity to the project location. For the remaining intersections, counts were updated by using 1 percent traffic growth rate between 2012 and 2014 per Los Angeles County CMP projections for this area.

Freeway Facilities Analysis

The LADOT entered into an agreement with Caltrans District 7 in October 2013 that requires a focused freeway impact analysis per Caltrans traffic impact studies procedures for all projects that began after October 2013.16 As part of the agreement, the City requires project applicants to work with Caltrans in preparing a freeway impact analysis for land use proposals that meet any of the following criteria:

- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F, based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane). Project impacts are identified for the future year 2016 conditions.

At those intersections operating deficiently (e.g., at a level worse than LOS D) and significantly impacted by the proposed project, a mitigation measure is identified and applied, and a before-and-after mitigation analysis conducted.

Impact Analysis

(a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located within the City of Los Angeles and is therefore subject to the California Transportation Plan (CTP), the Regional Transportation Plan (RTP), the City of Los Angeles General Plan, and the Southeast Los Angeles Community Plan. In order to accurately assess future traffic conditions with the proposed project and potential impacts to the applicable plans related to transportation, trip generation estimates were developed for the proposed project. Trip generation rates for the proposed project are based on the nationally recognized recommendations of the Institute of Transportation Engineers (ITE). ITE also provides information on percentage of truck traffic associated with this type of land use. Approximately 20 percent of all vehicular trips generated by a warehouse are designated as truck trips to allow evaluation of a reasonable worst-case scenario. A truck trip is generally equivalent to two (2) passenger car trips on average. Therefore, a 2.0 factor was applied to the number of truck trips to estimate passenger care equivalent (PCE) trips generated by the trucks.

It is calculated that the proposed project will generate approximately 1,966 net PCE trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).

While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).

The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, Proposed Project Traffic Conditions for 2016. The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic. However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project (see Section III, Project Description). According to the local hiring terms, an assertive

effort will be made such that 20 percent of all hours worked during construction at the proposed project site will be performed by local residents, and 10 percent will be performed by at-risk individuals. It is anticipated that the local hire agreement will reduce the proposed project's impacts to transportation/traffic by enabling employees to commute via public transit, carpooling, bike riding, and walking. Furthermore, the proposed project site is located along the 20-mile Alameda Corridor that links the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles. Through the implementation of the local hire agreement and the location of the proposed project along the Alameda Corridor, the proposed project would be consistent with the CTP, RTP, policies and goals outlined in the City's General Plan, and the Southeast Los Angeles Community Plan, particularly by reducing vehicle miles traveled (VMT) for employees, preserving the Alameda Corridor, promoting transit-oriented development growth, and reducing GHG emissions through public transit and alternative modes of transportation. The proposed project is also adjacent to the Blue Line and other transit facilities which would further reduce employee VMT.

To further ensure consistency with applicable plans, the proposed project is incorporating all recommendations provided by the LADOT for the proposed project as project elements.

Therefore, the results of the traffic analysis in conjunction with the local hire agreement and LADOT recommendations demonstrate that the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to creating a substantial increase in traffic is warranted.

(b) Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures; or other standards established by the county congestion management agency for designated roads or highways? Exceed, either individually or cumulatively, a level of service (LOS) standard established by the county congestion management agency for designated roads or highways?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable congestion management program (CMP). As was presented in question (a), the proposed project's impact on future traffic conditions would not exceed a LOS D standard or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. Additionally, through the implementation of the local hire agreement, the proposed project would reduce congestion impacts by enabling employees to utilize for other modes of transportation including public transit, carpooling, bike riding, and walking. Therefore, the proposed project would result in less than significant impacts to transportation/traffic, and no further analysis related to conflicting with an applicable CMP.

(c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Initial Study prepared for the proposed project determined that the proposed project would not result in impacts to transportation/traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

(d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would not result in impacts to transportation/traffic in relation to substantially increasing hazards due to a design feature or incompatible uses. In addition to the four buildings, the proposed project includes four full-access driveways on 41 Street and four full-access driveways on Martin Luther King, Jr. Boulevard (see FigureIV.G-1) along with eight loading docks (two per building).

The proposed project would not include any dangerous design features, including sharp or blind curves, dangerous intersections, or any hazardous or incompatible uses. Additionally, the project is not proposing any modifications or crossings of the railroad ROW. There are two at-grade rail crossings in the vicinity of the proposed project. The 41st Street at-grade crossing is located immediately on the west side of the project site, while the 38th Place at-grade crossing is located immediately on the east side of the project site. The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at grade crossing to travel outbound to the west during the p.m. peak hour, while a maximum of seven vehicles will use 38th Place at-grade crossing to travel inbound from the east during the a.m. and p.m. peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project. Additionally, the proposed project is proposing to widen Long Beach Avenue by 12 feet, Martin Luther King Boulevard by 5 feet, and South Alameda Street by 24.5 feet. Therefore, there would be no impacts to transportation/traffic related to substantially increasing hazards due to a design feature, and no further analysis is warranted.

(e) Would the project result in inadequate emergency access?

The proposed project would result in less than significant impacts to transportation/traffic in relation to emergency access. The proposed project area is serviced by the Newton Community Police Station located approximately one mile to the west of the proposed project site at 3400 South Central Avenue, Los Angeles, California 90011. Additionally, the

nearest City of Los Angeles Fire Department (LAFD) fire station to the proposed project site is the LAFD Station No. 14 located 0.8 miles northwest at 3401 South Central Avenue. The City of Vernon Station No. 2 is located approximately 0.8 mile to the southeast at 4305 South Santa Fe Avenue, Vernon, California 90058. In addition, there are two other LAFD fire stations within the project vicinity.

Furthermore, the proposed project includes the construction of a 28-foot-wide fire lane that will dissect the proposed project site in a north-south direction to allow emergency access along East Martin Luther King Jr. Boulevard and East 41st Street. Therefore, the proposed project site has adequate emergency access for local police and firefighters. As such, the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to emergency access is warranted.

(f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Initial Study prepared for the proposed project determined that the proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Cumulative Impacts

The updated traffic impact analysis for the proposed project indicates that the proposed project will generate approximately 1,966 net PCE trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour (Appendix IX).20 Although these estimates were developed based on approximately 351 truck trips per day from the proposed project, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR. The results indicate that all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the Volume to Capacity (V/C) ratio due to the project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

It was determined that there are 11 projects within a 2-mile radius of the proposed project site. Of these 11 projects, 5 are located in the direct trip path and near geographic proximity to the proposed project site such that these related projects could affect the cumulative impact analysis of the

proposed project within the construction period (Table II.B-1, Related Projects, Figure II.B-1, Related Projects). However, as shown in Table IV.G-7 (Future 2016 Conditions Without Project, which include traffic from related projects, and Future 2016 Conditions With the Proposed Project, which include traffic from related projects as well as the proposed project), the proposed project would be expected to result in a less than significant cumulative impact in relation to traffic and transportation; and the implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

The updated traffic impact analysis for the proposed Project indicates that with the assumption of 351 daily truck trips for the Project based on the recommendations of the Institute of Transportation Engineers, the proposed Project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour. The level of service (LOS) and volume to capacity (V/C) ratios for the study intersections with related proposed Project traffic and under proposed Project conditions for 2016 indicate that all study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours with the exception of the intersection of Alameda Street and Washington Boulevard, which will operate at LOS E during the p.m. peak hour. Although these estimates were developed based on approximately 351 truck trips per day from the proposed Project, the Project applicant has indicated that truck trips associated with operation of the proposed Project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in the FEIR. In order to reduce potential impacts, including impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are recommended. However, even with the implementation of recommended mitigation measures, impacts at the intersection of Alameda Street and Washington Boulevard will remain significant during the p.m. peak hour.

4. Mitigation Measures

As indicated above, all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the V/C ratio due to the proposed project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

The project applicant has identified five mitigation measures to be undertaken during design, construction, and operation of the proposed project to avoid significant impacts related to traffic and circulation.

Since the proposed project's traffic impacts would not be significant at any of the off-site intersections, no off-site mitigation measures would be necessary for the development of this project.

Traffic-1: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Traffic-2: All construction related traffic shall be restricted to off-peak hours.

Traffic-3: ~~41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way.~~

This mitigation was recommended prior to the adoption of the City of Los Angeles' Mobility Element 2035, in which 41st Street was reclassified to a Collector Street. Revised recommendations received from the Bureau of Engineering have been informed by the Mobility Element 2035. Therefore, this mitigation measure has been deleted.

Traffic-4: The Project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces.

Traffic-5: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

5. Level of Significance After Mitigation

Implementation of mitigation measures as included in the determination would reduce impacts to traffic and transportation facilities during construction and operation of the proposed project. However, significant impact would remain at the intersection of Alameda Street/Washington Boulevard in the event that new industrial park resulted in 351 daily truck trips at this location.

6. References

DEIR, at pp. IV.G-1 – IV.G-18; DEIR Appendices IX and XI; FEIR, at pp. IV-14 – IV-18; FEIR, Appendices B and C; FEIR, Response to Comment Nos. B1, B3, E2, E6, E9, E10, E11, E12, E14, E39, E43, E44, E46, E48, E68, E72, E79, E81.

VIII. Alternatives to the Original Project

To develop project alternatives, the EIR preparers considered the project objectives and the significant impacts identified in Section IV of this Draft EIR, identified those significant impacts that could be substantially avoided or reduced through an alternative, and determined the modifications to the project that would be needed to meet most of the basic objectives of the proposed project and substantially reduce or avoid the significant impacts of the project.

Three alternatives to the Project are identified in the FEIR, which include a No Project Alternative, a Use of Clean Fuel Trucks Alternative, and a Reduced Truck Operations Alternative. Two additional land use alternatives, the Community Garden Alternative and the Park or Recreational Use Alternative, were withdrawn from consideration on the grounds that they are inconsistent with the Project objectives set forth in the FEIR and the objectives and policies of the Southeast Los Angeles Community Plan. Based on an analysis of these alternatives, an environmentally superior alternative was identified. Each of the alternatives has been evaluated in relation to its ability to accomplish the Project objectives.

The objectives of the proposed project are as follows:

- Construct a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing.
- Locate a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- Develop an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- Provide opportunities for the project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project.
- Preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- The Southeast Los Angeles Community Plan Area population stands to benefit from the proposed project due to economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City.

Based on the analysis contained in the FEIR, the Project will result in a significant and unavoidable traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour.

Because significant environmental effects would remain even after application of all feasible mitigation measures, the City must adopt findings on the feasibility of Project

alternatives. If there is a feasible alternative to the Project, decision makers must decide whether it is environmentally superior to the Project.

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." State CEQA Guidelines section 15091 adds "legal" considerations as another indicia of feasibility. (See also Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 565.) Project objectives also inform the determination of "feasibility." (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 417.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Id.; see also Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 715.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (Residents Ad Hoc Stadium Com. v. Board of Trustees (1979) 89 Cal.App.3d 274, 287.)

The three identified alternatives, as well as the two alternate land use alternatives and the identified environmentally superior alternative, are summarized below.

A. **Alternate Land Use Alternative – Community Garden**

These alternatives, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or a park or recreational Use. However, these alternative were withdrawn from consideration for further analysis as it does not meet the basic objectives of the project:

- A community garden would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The Southeast Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands". The Project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Because the Community Garden Alternative does not meet the Project objectives and is inconsistent with the goals and policies of the Southeast Los Angeles Community Plan, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at p. VI-3; FEIR, at pp. IV-21 – IV-22; Response to Comment Nos. E7, E62, E63, and E67.

B. **Alternate Land Use Alternatives – Park or Recreational Use**

This alternative considered development of a portion of the property for an alternate land use, specifically a park or recreational use. However, this alternative was withdrawn from consideration for further analysis, because it is inconsistent with the adopted Community Plan and does not meet the basic objectives of the Project:

- A park or recreational use would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A park or recreational use would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A park or recreational use would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A park or recreational use would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A park or recreational use would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A park or recreational use would not benefit Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles

Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." The Project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Appendix XII and Section III.E of the DEIR provide details of a 2003 settlement agreement between the prior owner of the Project site and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation purposes, and subsequent amendment of the agreement to allow the proposed Project to be developed. This amendment for a cash pledge in lieu of a dedication of a portion of the Project site provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the Project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property. The cash pledge was subsequently utilized to improve recreational facilities at Ross Snyder Park, Fred Roberts Park, and the Pueblo Del Rio housing development.

Because the Community Garden Alternative does not meet the Project objectives, is inconsistent with the goals and policies of the Southeast Los Angeles Community

Plan, and has been determined to be inappropriate in an industrial corridor which is isolated to the east and west by major rail lines, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at pp. VI-3 – VI-4; FEIR, at pp. IV-22 – IV-24; Response to Comment Nos. E7, E62, E63, and E67.

C. **No Project Alternative**

1. **Description of the No Project Alternative**

There are no components to the No Project Alternative. Under the No Project Alternative, the proposed Project would not be constructed. The existing conditions at the site would remain unchanged, until a future project is proposed for development consistent with the light manufacturing zoning.

2. **Objectives and Feasibility**

The No Project Alternative would not meet any of the Project objectives. Leaving the property vacant would also be inconsistent with the light manufacturing land use zoning designation for the property. More importantly, the failure to develop the property for its designated purpose as light manufacturing would be inconsistent with land use planning objectives articulated in the adopted Southeast Los Angeles Community Plan.

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
  - **Policy 3-1.2**: Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.
  - **Policy 3-1.3**: Adequate compatibility should be achieved through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

Under the No Project Alternative, no construction would occur. Therefore, no environmental impacts would occur. There would be no anticipated short-term, long-term, or cumulative impacts.

3. **Finding Regarding Feasibility of the No Project Alternative**

The No Project Alternative would preclude development on the property, and as a result the Project objectives that have been set forth for the Project would not be met. Thus, this Alternative was considered but, for the reasons explained above, the City finds that it is infeasible and rejects it on that basis.

References: DEIR, at pp. VI-6 – VI-9; FEIR, at pp. IV-25.

D. **Use of Clean Fuel Trucks Alternative**

1. **Description of the Use of Clean Fuel Trucks Alternative**

This alternative would entail the same construction scenario and level of operation as the proposed Project. The proposed Project was determined to result in significant impacts to air quality requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Truck trips during the operational phase of the Project are the primary contributor to emissions of criteria air pollutants. Therefore, under this alternative, emissions would be reduced by requiring that a mix of conventional and alternative fuel supply and distribution truck be used to decrease emissions by 10 percent.

2. **Objectives and Feasibility**

As with the proposed Project, the Use of Clean Fuel Trucks Alternative is capable of achieving the six basic objectives of the proposed Project. Additionally, the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed project. Like the proposed Project, the Use of Clean Fuel Trucks Alternative would therefore result in significant impacts with regard to traffic and transportation at the intersection of Alameda Street/Washington Boulevard which would operate at LOS E during the p.m. peak hour. Because the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed Project, the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project.

3. **Finding Regarding Feasibility of the Use of Clean Fuel Trucks Alternative**

Because the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project, the City Council finds the Use of Clean Fuel Trucks Alternative to be infeasible and rejects it on that basis.

References: DEIR, at pp. VI-9 – VI-12; FEIR, at pp. IV-25.

E. Reduced Truck Operations Alternative

1. Description of the Reduced Truck Operations Alternative

The Reduced Truck Operations Alternative would entail the same elements that are described in the proposed Project. This alternative would entail the same construction of a new industrial park consisting of four buildings occupying approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The proposed Project was determined to result in significant traffic impacts requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Under this alternative, the Applicant voluntarily recommended reducing maximum allowable truck trips per day, during the operational phase of the project, to 75 trips per day. The empirical data for the Applicant's existing operations demonstrates that this is feasible, as the Applicant is currently operating at less than 50 truck trips per day.

2. Objectives and Feasibility

As with the proposed Project, the Reduced Truck Operations Alternative is capable of achieving the six basic objectives of the proposed Project. Under the Reduced Truck Operations Alternative, the significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour would be avoided. Though the Reduced Truck Operations Alternative would have fewer impacts than the Project, there are practical difficulties associated with monitoring and enforcing a restriction on the daily number of truck trips throughout the life of the Project.

3. Findings Regarding Feasibility of the Reduced Truck Operations Alternative

While data demonstrates that the Applicant does not create more than 50 truck trips per day, the imposition of a condition which sets a permanent cap or limit on truck trips of the industrial park limits the potential economic growth and long term viability of the industrial-zoned site. In the event that the new structures remain the same but the nature of the industrial park's operations change or the Applicant's business expands, there would not be an opportunity to revisit a trip cap and reassess the possibility of an adjusted limit.

In addition, an alternative that would limit truck operations presents practical difficulties with respect to long term enforcement following the construction of the industrial park. Both of the project's requested entitlements, a Parcel Map and a Site Plan Review, do not avail themselves with an inherent "plan approval" process that allows the City to revisit compliance with conditions and potentially revoke a grant if a condition is not appropriately followed in perpetuity. This challenge of ongoing monitoring is potentially further complicated in the event that the recorded parcel map is sold to four separate entities in the future.

For these reasons, the City finds the Reduced Truck Operations Alternative to be infeasible and rejects it.

References: DEIR, at pp. VI-12 – VI-15; FEIR, at pp. IV-26 – IV-27.

XI. OTHER CEQA CONSIDERATIONS

A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The EIR analyzes the potential for the project to result in growth-inducing impacts. Such impacts normally occur when a proposed project fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The types of projects normally considered to result in growth-inducing impacts are those that provide infrastructure suitable to support additional growth or that remove an existing barrier to growth.

The project will not provide infrastructure that would be suitable to support additional growth or that would remove an existing barrier to growth. The project is located in a developed area with permanent roads, utilities, and infrastructure capable of meeting the access, utilities, and service needs of the proposed project. The project is an urban infill project, making better use of capacity in the existing urban infrastructure. Project features and mitigation measures associated with the project will result in localized improvements to address project-related demand for infrastructure, but would not require new access roads, utilities, or infrastructure that might contribute to indirect growth-inducing impacts.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines provide an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. Such a change refers to an irretrievable commitment of nonrenewable resources, such as those used as building materials, or other environmental changes, such as urbanization, that commit future generations to the use of natural resources. Potential irreversible changes including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The project site is currently vacant and is located in an urbanized area of the City of Los Angeles (City) within the Alameda Corridor. Implementation of the project will represent a continued long-term commitment to use of the site. As a result, the

project will involve an irreversible commitment to the use of nonrenewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and sand and mineral resources used in construction materials. However, the project will not require a large commitment of any of these resources, and impacts related to this issue will be less than significant.

The project includes development of a new industrial park consisting of four buildings on a site that is currently vacant and is in an urbanized area that is already served by an existing roadway system and utility infrastructure. Implementation of the proposed project would not commit future generations to using the proposed project site for the proposed land uses.

The project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the project will construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. The proposed project would continue to drain into existing City storm drain infrastructure, and runoff from the proposed project site would not exceed the capacity to existing or planned stormwater drainage systems, and would not cause irreversible environmental damage. Therefore, the proposed project would not result in irreversible damage that could result from environmental accidents.

C. CEQA Considerations

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR and the Recirculated Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: Aesthetics/Visual Impacts, Air Quality, Geology and Soil (Geotechnical), Greenhouse Gas Emissions, Land Use, Transportation and Circulation, Noise and Vibration, Visual Resources, Light and Glare, Geotechnical, Water Resources, Air Quality, Cultural Resources, Public Services, Utilities, and Population, Housing and Employment. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, Growth Inducing Impacts of the project and Energy. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after

the review periods and responds to comments made during the public review period.

4. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR and accordingly provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR.

   Specifically, the City finds that:

   a. The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

   b. The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

   c. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial

increase in the severity of an impact disclosed in the Final EIR, or feasible a feasible mitigation measure or alterative not included in the Final EIR.

6. The mitigation measures identified for the original project were included in the Draft EIR and Final EIR. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program ("MMP"). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

7. CEQA requires the Lead Agency approving a project to adopt a Mitigation Monitoring Program ("MMP") or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

9. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

11. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

12. The EIR is a Project EIR for purposes of environmental analysis of the project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions.

13. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, include or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its

certification, and that the Final EIR need not be recirculated prior to its certification.

IX. Statement of Overriding Considerations

The findings and this Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, the references included in the EIR, the public hearing for the entitlements, and the documents and materials that constitute the record of proceedings.

The EIR has identified a significant and unavoidable impact that would result from the implementation of the proposed project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of the approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. TO adopt a Statement of Overriding Considerations, the decision-maker must balance the economic, legal, social, technologically, or other benefits of a proposed project against its unavoidable environmental risks when determination whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

The City finds that the mitigation measures described in the FEIR will, when implemented, mitigate or substantially lessen all but one of the significant effects identified in the FEIR. A significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour is unavoidable even after incorporation of all feasible mitigation measures due to the volume of trucks that have been assumed to service the Project based on Institute of Traffic Engineers projections. For this effect, pursuant to Public Resources Code Section 21081(b) and State CEQA Guidelines sections 15093 and 15043, the City has balanced the benefits of the Project against the unavoidable adverse environmental risk in approving it.

In this regard, the City hereby finds that all feasible mitigation measures identified in the FEIR have been and will be implemented with the Project and that any significant unavoidable effects remaining are acceptable due to the following specific economic, social, and other considerations, including but not limited to Project benefits, based upon the findings set forth above, in the FEIR, and in the public record of the consideration of this Project.

The Project's significant and unavoidable adverse impact is the following:

- Traffic impacts at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour.

Accordingly, the City adopts the following Statement of Overriding Considerations, recognizing that a significant and unavoidable impact could potential result from the

implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the project described above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons discussed below.

These stated reasons summarize the benefits, goals, and objectives of the proposed project, and provide, in addition to the findings made above, the detailed rationale for the benefits of the project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the project justify adoption of the project and certification of the completed EIR, notwithstanding certain significant and unavoidable impacts. Many of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the project and justify adoption of the project and certification of the completed EIR. In particular, achieving the underlying purpose for the project would be sufficient to override the significant environmental impacts of the project. The City hereby finds that the following social, economic, and planning benefits of the Project outweigh the p.m. peak hour traffic impact of the Project at the intersection of Washington Boulevard and Alameda Street that would result if 351 truck trips were generated in connection with the operation of the proposed Project.

- The proposed development of the Property for light industrial use will effectuate the goals and policies of the Southeast Los Angeles Community Plan by converting an existing underutilized vacant parcel of land to productive use as a light manufacturing facility on property that is planned and zoned for light industrial use.

- Development of the Project will result in the creation of more than 450 new permanent garment manufacturing jobs. The Project Applicant has entered into a Local Hire Agreement with the Coalition for Responsible Community Development ("CRCD") and the Los Angeles Job Corps, according to which the Applicant will make an assertive effort to hire local residents for at least 50 percent of new employment positions and/or employment positions for which local residents are qualified that become vacant during the term of the agreement. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The Applicant will also pay a one time fee of $250,000 to CRCD and the Los Angeles Job Corps. (FEIR, Appendix O).

- The Project Applicant's general contractor has entered into a Construction Local Hire Agreement with Playa Vista Job Opportunities and Business Services ("PVJOBS") for each of the four new buildings to be developed on the Project site, according to which an assertive effort will be made such that 20 percent of all hours worked in construction will be performed by local residents. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. An assertive effort will also be made such that included within the 20 percent local hire goal, 10 percent of all

hours worked in construction will be performed by at-risk individuals, who are described in the agreement as a local resident who lacks a high school diploma or GED, has a history of substance abuse, has a household income below 50 percent of median, is homeless, a welfare recipient, has a history of involvement with the justice system, is chronically unemployed, or a single parent. (FEIR Appendix O).

- Development of the Project will result in improved public infrastructure due to the dedication and widening of the public right-of-way along Alameda Street, 41st Street, and Long Beach Avenue as well as new curbs, gutters, sidewalks, street trees, street lights, and upgraded traffic control devices.

- The development of the Project as proposed will directly result in increased revenues to the City of Los Angeles through increased property taxes based on an increase of approximately $30 million in assessed value upon completion of construction based on approximate construction costs of between $60.00 and $65.00 per square foot of floor area, and will indirectly result in increased revenues through increased sales and other use taxes from higher rates of employment in the surrounding community.

Based on the entire record of proceedings, the City finds that the foregoing social, economic, and planning considerations outweigh the significant, unavoidable impact of the Project as identified in the FEIR. The substantial evidence demonstrating the benefits of the Project are found in these findings, and in the documents found in the record of proceedings.

The City further fins that none of the public comments to the Draft EIR or subsequent public comments of other evidence in the record, included or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be further recirculated prior to its certification.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Preliminary Parcel Map No. AA-2012-919-PMLA the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP WILL BE/IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Preliminary Parcel Map was prepared by a Registered Professional Engineer and contains the required components, dimensions, areas, notes, legal description, ownership, applicant, and site address information as required by the Los Angeles Municipal Code ("LAMC").

The adopted Southeast Los Angeles Plan designates the subject property for Light Manufacturing land use with the corresponding zone of M2. The property is also

located within the South Los Angeles Alcohol Sales Specific Plan and the Council District 9 Redevelopment Project area. The property contains approximately 13 net acres (565,798 net square feet after required dedication) and is presently zoned M2-2. The applicant is proposing to develop four (4) Industrial buildings on a site consisting of four (4) industrial lots the Subdivision Map Act.

The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas).

The Southeast Los Angeles Community Plan, a part of the Land Use Element, encourages projects that comply with Goal No. 3 of the Plan to provide:

"Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force, and which have minimal adverse impact on adjacent uses" with implementation of the following Objectives and Policies:

> Objective 3-1: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> > Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
> >
> > Policy 3-1.2: Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.

In addition to being consistent with the Southeast Los Angeles Community Plan, the proposed industrial project is further in line with the City's General Plan Framework Element, which sets forth a comprehensive long-range growth strategy for the City and defines citywide policies regarding such pertinent issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services.

The proposed development of four lots for the construction of four industrial buildings is allowable under the current adopted zone and the land use designation. The project will provide new commercial/industrial opportunities for the Community Plan area.

The Preliminary Parcel Map describes and illustrates a land use consistent with the General Plan Land Use Designation of Light Manufacturing within the Southeast Los Angeles Community Plan that corresponds to the MR2 and M2 Zones. The proposed light industrial use buildings are permitted in said land use designation and zone. The project's density is consistent with the site's existing zoning regulation. The map provides the required components of a preliminary parcel map. Therefore, the proposed map is substantially consistent with the applicable General

Plan affecting the project site and demonstrates compliance with Section 17.53 of the Los Angeles Municipal Code as well as the intent and purpose of the General Plan.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

Section 66418 of the Subdivision Map Act defines the term "design" as follows: "Design" means: (1) street alignments, grades and widths; (2) drainage and sanitary facilities and utilities, including alignments and grades thereof; (3) location and size of all required easements and rights-of-way; (4) fire roads and firebreaks; (5) lot size and configuration; (6) traffic access; (7) grading; (8) land to be dedicated for park or recreational purposes; and (9) such other specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan. In addition, Section 66427 of the Subdivision Map Act expressly states that the "Design and location of buildings are not part of the map review process for condominium, community apartment or stock cooperative projects."

Section 17.05-C of the Los Angeles Municipal Code enumerates design standards for Subdivisions and requires that each subdivision map be designed in conformance with the Street Design Standards and in conformance to the General Plan. Section 17.05-C, third paragraph, further establishes that density calculations include the areas for residential use and areas designated for public uses, except for land set aside for street purposes ("net area"). The map provides the required components of a preliminary parcel map.

The design and layout of the parcel map are consistent with the design standards established by the Subdivision Map Act and Division of Land Regulations of the Los Angeles Municipal Code. Several public agencies (including Fire Department, Department of Building and Safety, Bureau of Engineering, and Bureau of Sanitation) have reviewed the map and found the subdivision design satisfactory. These agencies have imposed improvement requirements and/or conditions of approval. Sewers are available and have been inspected and deemed adequate in accommodating the proposed project's sewerage needs. The subdivision will be required to comply with all regulations pertaining to grading, building permits, and street improvement permit requirements. Conditions of Approval for the design and improvement of the subdivision are required to be performed prior to the recordation of the vesting map, building permit, grading permit, or certificate of occupancy.

Martin Luther King, Jr. Boulevard is a Local Street with a variable width of 50-57 feet, 41st Place is a Local Street with a 60-foot width, Long Beach Avenue East is a Major Highway-Class II with a variable width of 40-50 feet, Alameda Street is a Major Highway-Class II with a variable width of 55-72.5 feet, the two alleys each have a 12-foot width and 40th Place is a Local Street with a 50-foot width at the project's street frontage. In addition to the subdivision request, the applicant is requesting the merger of the right-of-way along the two alleys and 40th Place. The Bureau of Engineering is requiring dedications along Martin Luther King Jr. Boulevard, Alameda Street, 41st Street and Long Beach Avenue. In addition, the applicant has been conditioned to be granted approval for the proposed merger of

40th Place and the two alleys from the Department of Transportation. As conditioned the design and improvements of the proposed project are consistent with the applicable General Plan.

The proposed project is to allow four lots and the construction of four industrial buildings. The property is zoned M2-2 which allows for the construction of light industrial uses including limited industrial and manufacturing uses, storage yards, animal keeping and mortuaries. Height district 2 does not limit height. The project will provide over 400 parking spaces, in compliance with the Los Angeles Municipal Code. The project site is located within the Southeast Los Angeles Community Plan area and the South Los Angeles Alcohol Sales Specific Plan, however the proposed project is not subject to the requirements of the specific plan. Therefore, as conditioned, the design and improvement of the proposed subdivision is consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The site is one of the few under improved properties in the vicinity. The development of this Parcel Map is an infill of an otherwise industrial neighborhood. The site is level and is not located in a slope stability study area, high erosion hazard area, or a fault-rupture study zone. The parcel map has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits.

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with small lot single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. The site has two vacated alleys and a vacated street (40th Place) that run east-west through the site. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1

Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

The site is currently vacant and the proposed project would provide four lots with one industrial building on each of the four lots. Lot No. 1 would include a building 115,973 square feet in size with 123 parking spaces; Lot No. 2 would include a building 133,680 square feet in size with 79 parking spaces, Lot No. 3 would include a building 116,724 square feet in size with 96 parking spaces, and Lot No. 4 would include a building 113,743 square feet in size with 106 parking spaces. The proposed project would provide an appropriate development in the immediate neighborhood. The proposed project will comply with all LAMC requirements for parking, yards, and open space. As conditioned the proposed parcel map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The present project site does not provide a natural habitat for either fish or wildlife. Furthermore, the Environmental Impact Report that was prepared for the project concluded that the proposed project would not result in impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts; species recognized by the U.S. Fish and Wildlife Service (USFWS) as federal species of concern or by the California Department of Fish and Wildlife (CDFW) as a California Species of Special Concern (SSC); locally important species; riparian habitat or other sensitive natural communities; federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; movement of any migratory fish or wildlife species or with an established wildlife corridor; conflicts with any local policies or ordinances protecting biological resources; or conflicts with the provisions of any adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Based on a record search and site visit, there is no riparian habitat or any other state-designated sensitive natural communities on the subject property, and there are no wetlands or other waters of the United States afforded protection pursuant to Section 404 of the Federal Clean Water Act within the subject property. Given the state of the existing site, and the fact that surrounding properties also do not provide a natural habitat for either fish or wildlife, the design the subdivision and the proposed improvements are not likely to cause any substantial environmental damage or substantially and avoidably injure fish or wildlife, or their habitat.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide

ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system.

The proposed subdivision and subsequent improvements are subject to the provisions of the Los Angeles Municipal Code (e.g., the Fire Code, Planning and Zoning Code, Health and Safety Code) and the Building Code. Other health and safety related requirements as mandated by law would apply where applicable to ensure the public health and welfare (e.g., asbestos abatement, seismic safety, flood hazard management).

The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system, where collected sewage is directed to sewer treatment plants, which have been upgraded to meet Statewide Ocean Discharge Standards. Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The site is surrounded by private properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, Public Park or any officially recognized public recreation area. Necessary public access for roads and utilities will be acquired by the City prior to recordation of the proposed map. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows,

insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the preliminary and final maps for Parcel Map No.AA-2012-919-PMLA.

THE FOLLOWING NOTES ARE FOR INFORMATIONAL PURPOSES AND ARE NOT CONDITIONS OF APPROVAL OF THIS PARCEL MAP:

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with LAMC Section 17.05-N.

As part of the construction of your project, you may wish to make arrangements, with the Telecommunications Bureau regarding the cable television franchise holder for this area at 213 922-8363.

The above action shall become effective upon the decision date noted at the top of this letter unless an appeal has been submitted to the City Planning Commission within 15 calendar days of the decision date. If you wish to appeal, a Master Appeal Form No. CP-7769, must be submitted, accepted as complete, and appeal fees paid by 5:00 PM on October 10, 2016* at one of the City Planning Department Public Counters, located at:

Figueroa Plaza
201 N. Figueroa Street, 4th Floor
Los Angeles, CA 90012
213 482-7077

Marvin Braude San Fernando Valley
Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
818 374-5050

*Please note the cashiers at the public counters close at 3:30 PM.

Forms are also available on-line at http://cityplanning.lacity.org/

Pursuant to Ordinance No. 176,321, effective January 15, 2005, Parcel Map determinations are only appealable to the Area Planning Commission. There is no longer a second level of appeal to the City Council for Parcel Map actions of the Advisory Agency.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

If you have any questions, please call Public Counter staff at (213) 482-7077 or (818) 374-5050.

No sale of separate parcels is permitted prior to recordation of the final parcel map. The owner is advised that the above action must record within 36 months of the date of approval, unless an extension of time has been requested in person before 5:00 p.m. September 23, 2019.

No requests for time extensions or appeals received by mail shall be accepted.

Vincent P. Bertoni, AICP
Advisory Agency

JORDANN TUNER
Deputy Advisory Agency

JT:JM

cc: Bureau of Engineering - 4
Community Planning Bureau
Planning Office & 1 Map
D.M.
Bureau of Street Lighting
Street Tree Division & 1 Map
Dept. of Building & Safety, Zoning & 2 Maps
Department of Building & Safety, Grading
Department of Fire
Department of Recreation & Parks & 1 Map
Department of Transportation, CPC Section
Room 600, 221 N. Figueroa Street

If you have any questions, please call the Development Services Center staff at (213) 482-7077 or (818) 374-5050.

"REVISED"

PRELIMINARY PARCEL MAP L.A. 2012 - 0919

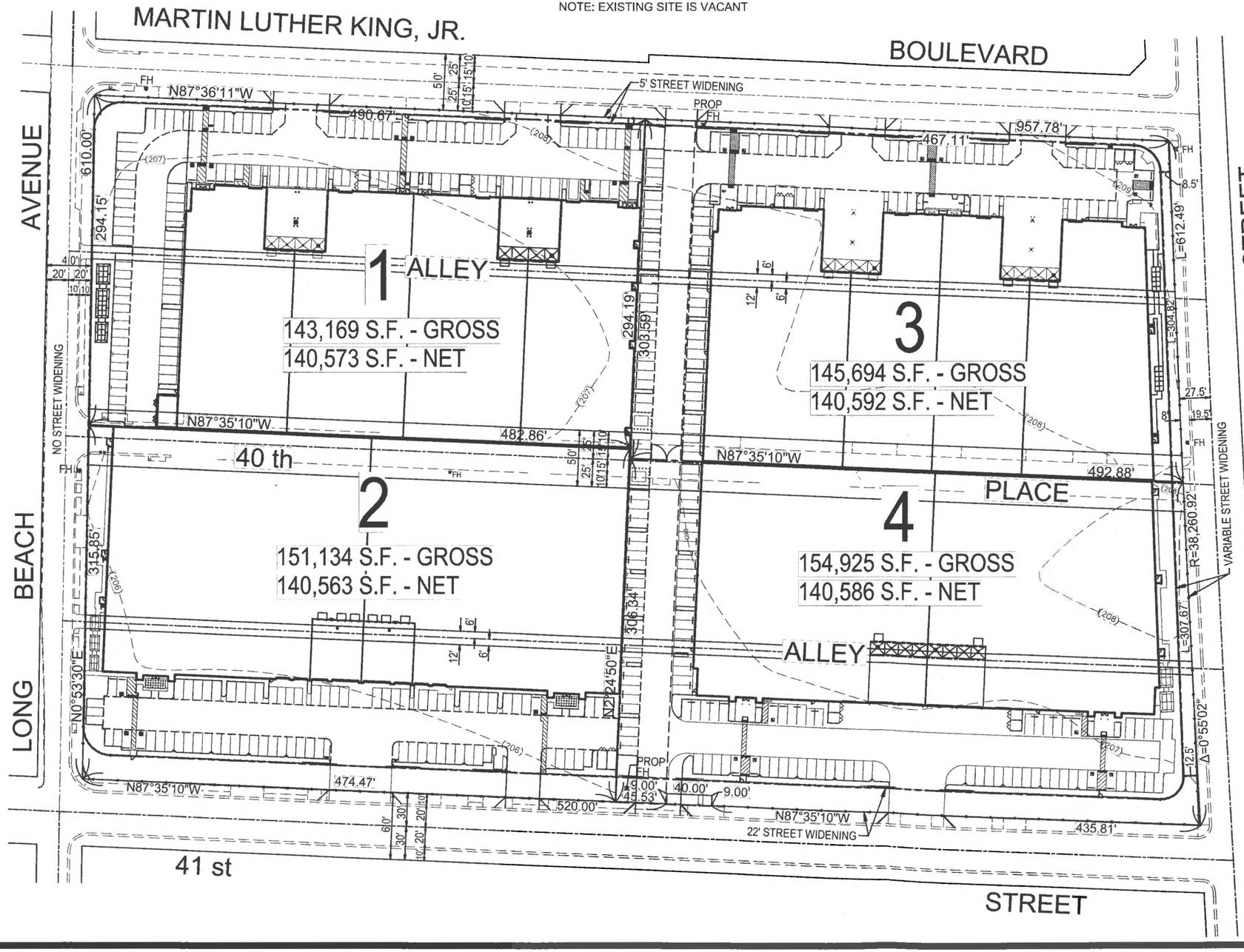
IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES
STATE OF CALIFORNIA

BEING A SUBDIVISION OF PORTIONS OF LOTS 38, 39, 105, 106, 162, 173 AND ALL OF LOTS 40-62, INCL., 81-104, INCL., 107-130, INCL., 149-161, INCL., AND 163-172, INCL., ALL IN EAST JEFFERSON STREET TRACT NO.1 AS PER MAP RECORDED IN BOOK 7, PAGE 13 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

NOTE: EXISTING SITE IS VACANT

OWNER & SUBDIVIDER:
PIMA ALAMEDA PARTNERS, LLC
3435 WILSHIRE BLVD., SUITE 1190
LOS ANGELES, CA 90010

LOS ANGELES DEPT. OF CITY PLANNING
SUBMITTED FOR FILING
☐ PARCEL MAP
APR 11 2016
☑ REVISED MAP ☐ EXTENSION OF TIME
☐ FINAL MAP UNIT ☐ MODIFIED
DEPUTY ADVISORY AGENCY



GENERAL NOTES

1. PROPOSED SUBDIVISION IS 4 INDUSTRIAL LOTS
2. SITE ADDRESS: 4051 ALAMEDA STREET
3. EXISTING AND PROPOSED ZONING: M2-2 HEAVY MANUFACTURING
4. SITE AREA = 594,922 S.F. (GROSS) AND 562,314 S.F. (NET)
5. ALL PUBLIC UTILITIES ARE AVAILABLE TO THE SITE.
6. VEHICULAR ACCESS WILL BE BY DRIVEWAYS OFF OF 41st STREET AND MARTIN LUTHER KING JR. BOULEVARD

NOTE: THIS SITE IS NOT IN A FLOOD HAZARD AREA, A SPECIAL HAZARD AREA, A HILLSIDE AREA, A FLOODWAY OR A MUD-PRONE AREA.

NOTE: THE FOLLOWING TREES ARE PROTECTED SPECIES

1. OAKS (QUERCUS SPP.) - DOES NOT INCLUDE SCRUB OAK
2. WESTERN SYCAMORE (PLATANUS RACEMOSA)
3. CALIFORNIA BAY (UMBELLULARIA CALIFORNICA)
4. SOUTHERN CALIFORNIA BLACK WALNUT (JUGLANS CALIFORNICA)

NOTE: THERE ARE NO EXISTING PROTECTED TREES ON THIS SITE

REQUIRED STREET DEDICATIONS:
MARTIN LUTHER KING JR. BOULEVARD - 5 FEET
ALAMEDA STREET - 8.5 FEET TO 12.5 FEET
41st STREET - 22 FEET
LONG BEACH BOULEVARD - NONE.

NOTE: A REQUEST FOR MERGER PER SECTION 66499.20½ OF THE STATE GOVERNMENT CODE OF THOSE PORTIONS OF RIGHT-OF-WAY OF 40TH PLACE AND THE TWO ALLEYS NORTHERLY AND SOUTHERLY OF 40TH PLACE.

N

SCALE: 1" - 100'
MARCH 18, 2016

PREPARED BY:
GILBERT ENGINEERING COMPANY, INC.
2028 E. ROUTE 66, SUITE 203
GLENDORA, CA 91740
(626) 852-1600

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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DEPUTY DIRECTOR
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http://planning.lacity.org

SITE PLAN REVIEW

September 23, 2016

Pima Alameda Partners, LLC (A/O)
3425 Wilshire Boulevard, Suite1190
Los Angeles, CA 90010

Gilbert Engineering (E)
2028 E. Route 66, Suite 203
Glendora, CA 91740

Richard Lucas (R)
C.E.G. Construction
7901 Crossway Drive
Pico Rivera, CA 90660

Los Angeles Department of Building and Safety

Case No.	DIR-2013-0887-SPR
CEQA:	ENV-2012-920-EIR SCH No. 2014061030
Related Case:	AA-2012-919-PMLA
Location:	4051 South Alameda Street
Council District:	9 – Price
Neighborhood Council	South Central
Community Plan Area:	Southeast Los Angeles
Land Use Designation:	Light Manufacturing
Zone:	M2-2
Legal Description:	Lot 21-24 and 36-38 of Tract 5485

Last Day to File an Appeal: October 10, 2016

Pursuant to LAMC Section 16.05.E, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

Find that the project was assessed in the 4051 South Alameda Street Project FEIR, **ENV-2013-920-EIR** (SCH. No. 2014061030) ("4051 South Alameda Street Project FEIR").

Approve with Conditions a Site Plan Review for the construction, use, and maintenance of an approximately 480,120 square-foot light industrial complex, composed of four (4) structures, and a surface parking lot; and

Adopt the attached findings.

EXHIBIT 2

CONDITIONS OF APPROVAL

The project approval is based upon the attached Findings, and subject to the attached Conditions of Approval:

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.

2. **Floor Area.** The project shall be limited to 480,120 square feet in floor area.

3. **Height.** The project shall be limited to two stories, with a maximum height of 39 feet.

4. **Entrances**
   a. Main pedestrian entrances shall be located along the project's Martin Luther King Jr. Boulevard and 41st Street frontages.
   b. Additional pedestrian entrances located along Alameda Street and Long Beach Avenue, shall serve as secondary entrances, only.

5. **Open Space/Landscaping.** The project shall provide a minimum of 30,474 square feet of landscaped open space area.

   a. Each lot shall contain a minimum of 7,000 square feet of landscaped open space area.
   b. Each of the project's four (4) light industrial structures shall provide at least two outdoor, seated lunch areas located within the structure's adjoining landscaped area.
   c. A minimum of one (1), 36-inch box tree shall be planted for every four (4) parking surface parking spaces provided.
   d. A minimum of two (2), 36-inch box trees shall be planted adjacent to each outdoor lunch area, so as to provide shade.

6. **Automobile Parking.** On-site parking shall be provided in compliance with the Los Angeles Municipal Code (LAMC).

7. **Bicycle Parking.** Bicycle parking shall be provided in compliance with LAMC Section 12.21-A,16.

8. **Driveways.** A maximum of five (5) driveways shall be permitted on Martin Luther King Jr. Boulevard and a maximum of four (4) driveways shall be permitted on 41st Street. Driveways along Alameda Street and Long Beach Avenue shall be prohibited.

9. **Loading/Unloading.** Vehicular loading and unloading shall be prohibited from occurring along the project's Alameda Street and Long Beach Avenue frontages.

10. **Mechanical Equipment.** All mechanical equipment on the roof shall be screened from view.

11. **Parking and Driveway Plan.** A parking area and driveway plan shall be submitted to the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety.

12. **Maintenance.** The subject property (including any trash storage areas, associated parking facilities, sidewalks, driveways, yard areas, parkways, and exterior walls along the property lines) shall be maintained in an attractive condition and shall be kept free of trash and debris.

13. **Department of Transportation.** The project shall comply with the Project Requirements as detailed in the Department of Transportation letter to the Planning Department (DOT Case No. CEN 12-40373).

14. **Bureau of Engineering.** The project shall comply with the Dedication and Improvement Requirements as detailed in the Bureau of Engineering letter to the Planning Department dated June 13, 2016.

Administrative Conditions

15. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

16. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

17. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County' Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assigns. The agreement shall be submitted to the Department of City Planning for approval before being recorded. After recordation, a certified copy bearing the Recorder's number an date shall be provided to the Department of City Planning for attachment to the file.

18. **Definitions.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices legislation or their successors, designees, or amendment to any legislation.

19. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

20. **Utilization of Entitlement.** Site Plan Review requires completion of all applicable conditions of approval to the satisfaction of the Department of City Planning. The applicant/owner shall have a period of three years from the effective date of the subject grant for the Site Plan Review to effectuate the terms of this entitlement by securing a building permit. Thereafter, the entitlements shall be deemed terminated and the property owner shall be required to secure a new authorization for the use. If a building permit is obtained during this period, but subsequently expires, this determination shall expire with the building permit.

21. **Notations on Plans.** A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification

shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.

22. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

23. **Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director of Planning, pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if in the decision makers opinion, such actions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.

24. **Expedited Processing Section Fee.** Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

25. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out, in whole or in part, of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

    (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with <u>any</u> federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

<u>Environmental Mitigation Conditions</u>

26. **Mitigation Monitoring.** Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Los Angeles Department of City Planning is the Lead Agency for the proposed project.

An Environmental Impact Report has been prepared to address the potential environmental impacts of the proposed project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the project. This Mitigation Monitoring

Program (MMP) is designed to monitor implementation of the mitigation measures identified for the project. The MMP was reviewed and approved by the Lead Agency as part of the certification of the EIR and adoption of project conditions by the Advisory Agency on September 3, 2016. The required mitigation measures are listed and categorized by impact area, as identified in the EIR, with an accompanying identification of the following:

Enforcement Agency: The agency with the authority to enforce the Mitigation Measure/Project Design Feature.
Monitoring Agency: The agency to which reports including feasibility, compliance, implementation, and development are made.
Monitoring Phase: The phase of the project during which the Mitigation Measure/Project Design Feature shall be monitored.
Monitoring Frequency: The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.
Action Indicating Compliance: The action of which the Enforcement of Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

After review and approval of the final MMP by the City, minor changes and modifications to the MMP are permitted, but can only be made by the applicant subject to the approval by the City. The City, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed changes or medication. The flexibility is necessary due to the nature of the MMP, the need to protect the environment in the most efficient manner, and the need to reflect changes in regulatory conditions, such as but not limited to changes to building code requirements. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the City.

27. **Mitigation Measures and Project Design Features.** The development of the project site is hereby bound to the following Mitigation Measures and Project Design Features, which are conditions of approval.

Mitigation Measures

Mitigation Measure Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

Mitigation Measure Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction

Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

Mitigation Measure Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

Mitigation Measure Air-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) **Development in excess of 25,000 square feet of gross floor area.** The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

1) Current routes and schedules for public transit serving the site;

2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

3) Ridesharing promotion material supplied by commuter-oriented organizations;

4) Regional/local bicycle route and facility information;

5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) **Development in excess of 50,000 square feet of gross floor area.** The owner shall comply with Paragraph (a) above and in addition shall provide:

1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and access ways used by vanpool vehicles when located within a parking structure;

7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) **Development in excess of 100,000 square feet of gross floor area.** The owner shall comply with Paragraphs (a) and (b) above and shall provide:

1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation
Monitoring Period: Pre-occupancy
Monitoring Frequency: One-time prior to occupancy
Action Indicating Compliance: Compliance certification report by project contractor

Mitigation Measure Air-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Period: Preconstruction
Monitoring Frequency: One-time prior to construction
Action Indicating Compliance: LADOT Approval; Public Works approval

Mitigation Measure Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works
Monitoring Period: Preconstruction
Monitoring Frequency: One-time prior to construction
Action Indicating Compliance: LADOT approval; Public Works approval

Mitigation Measure Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Periodic field inspections during construction
Action Indicating Compliance: Plans and Specifications; Field inspection sign-off; Compliance certification report by project contractor

Mitigation Measure Cult-1: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.[1]

- Paleontological Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

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[1] Society of Vertebrate Paleontology. "Conformable Impact Mitigation Guidelines." Available at: http://vertpaleo.org/The-Society/Governance-Documents/Conformable-Impact-Mitigation-Guidelines-Committee.aspx

- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: At time of resource discovery, should it occur
Action Indicating Compliance: If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by a qualified paleontologist; if unanticipated discoveries are found, submittal of a report and mitigation plan(s) by a qualified paleontologist.

Mitigation Measure Cult-2: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

- A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

- Cultural Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural

resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of archaeological material, sketches of recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic per recommendations of archaeological monitor.
Action Indicating Compliance: If archaeological resource are unearthed, submittal of compliance certification report and treatment plan by a qualified archaeological monitor.

Mitigation Measure Traffic-1: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Enforcement Agency: Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Transportation
Monitoring Period: Preconstruction; construction
Monitoring Frequency: Once, prior to issuance of building permit; Periodic field inspections during construction
Action Indicating Compliance: Approval from the Los Angeles Department of Transportation Prior to issuance of Building Permit (Pre-Construction); compliance certification report submitted by Project contractor (Construction)

Mitigation Measure Traffic-2: All construction related traffic shall be restricted to off-peak hours.

Enforcement Agency: Los Angeles Department of Transportation
Monitoring Agency: Los Angeles Department of Transportation, Los Angeles Department of Building and Safety
Monitoring Period: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance: Field inspection sign-off; Compliance certification report submitted by the Project Contractor

Mitigation Measure Traffic-4: The project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces.

Enforcement Agency: Los Angeles Department of Transportation; Department of Public Works; Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety;
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work
Action Indicating Compliance: Sign-off on construction plans; Sign-off on completed construction work

Mitigation Measure Traffic-5: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Bureau of Engineering; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Period: Preconstruction and construction
Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work
Action Indicating Compliance: Plans and Specifications; Sign-off on construction plans; Sign-off on completed construction work

Mitigation Measure Utilities-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation
Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation
Monitoring Period: Construction; Operation
Monitoring Frequency: Once prior to final certificate of occupancy; annually during first three years of operation
Action Indicating Compliance: Plans and Specifications

PROJECT BACKGROUND

The project site is located at 1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street. The site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. In relation to major highways, the site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The project site is located within the Southeast Los Angeles Community Plan area and has a Light Manufacturing land use designation with the corresponding M2-2 Zone. The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

The site is rectangular in shape and is transected by a paved road (East 40th Place) through the central portion in an east-west direction. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west.

The project involves the vacation of two alleys and a street (40th Place) that run east-west through the site. These requests have been made and tentatively approved in conjunction with the related Preliminary Parcel Map project. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet.

The proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots.

Site History

The subject property was acquired by the City of Los Angeles through eminent domain in 1986 for the purpose of constructing a trash incinerator known as the Los Angeles City Energy Recovery ("LANCER") project. The condemnation judgment provided that the Alameda-Barbara Investment Company, which owned 11 acres of the approximately 13-acre site, would have a first right to repurchase the property should the City determine that the property was no longer needed for public use. The LANCER project was terminated due to community opposition and in 1994 the property was transferred to the City Harbor Department for $13.3 million. The Harbor Department granted a revocable permit to the Los Angeles Regional Food Bank ("the "Food Bank") to occupy and use the site as a community garden.

In late 1994, the Harbor Department began negotiations with the Libaw-Horowitz Investment Company ("Libaw-Horowitz"), the successor-in-interest to the Alameda-Barbara Investment Company, with regard to the repurchase of the property, and by October 1996, a purchase and sale agreement had been signed by Libaw-Horowitz with the understanding that the agreement would be presented to the Board of Harbor Commissioners and City Council for consideration. In 2001, the Harbor Department informed Libaw-Horowitz that it would not sell the property. Instead, it offered the land publicly for development under a long-term lease. In response, Libaw-Horowitz

filed suit against the City for breach of contract.

The City settled the lawsuit with Libaw-Horowitz in 2003 and the land was sold to Libaw-Horowitz. As part of the settlement agreement, Libaw-Horowitc agreed to dedicate 2.6 acres of the property for park and recreational purposes. In January 2004, Libaw-Horowitz gave written notice to the Food Bank that its revocable permit to occupy the land would terminate on February 29, 2004. Occupants of the community garden filed a lawsuit arguing the City's settlement with Libaw-Horowitz violated their rights, and they were granted an injunction allowing them to remain on the land until the case was resolved in favor of Libaw-Horowitz in June of 2005. Use of the property as a community garden ceased in 2006 when the community garden was vacated. The property has remained vacant ever since.

In 2008, the Horowitz Group, as a successor-in-interest to Libaw-Horowitz, proposed to sell the property to a major Los Angeles-based garment manufacturer that expressed interest in purchasing the property to develop a 46-foot high, two-story structure containing approximately 643,000 square feet of warehouse and ancillary support space with subterranean parking for 306 cars. The City circulated a mitigated negative declaration to evaluate the proposed development of the property, but the Horowitz Group did not finalize the sale to the proposed developer and did not seek final approval of the proposed project.

In the meantime, the Horowitz Group worked with the City to amend the settlement agreement to substantiate a cash pledge for the dedication of the 2.6 acres of the property for park and recreational purposes. In 2011, the City Council accordingly adopted Ordinance No. 181949 authorizing execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made, and a special trust fund was created to provide and improve recreational and park facilities in the vicinity of the property. The amendment allows for development of the property consistent with the land use designation and zoning and provides the City with the funds to create or make improvements to recreational facilities in a more appropriate location than the property, which is industrially zoned and isolated to the east and west by major rail lines. In 2012, the City Council adopted a motion authorizing the City Controller to transfer the funds from the special trust find in order to fund improvements at the Pueblo Del Rio housing project, Fred Roberts Park, and the Ross Synder Park. In the meantime, the Los Angeles Community Gardening Council was successful in establishing a new seven-acre community garden with 190 plots at 110th Street and Avalon Boulevard, to which many of the community gardeners formerly using the property were able to relocate.

In March 2012, the Horowitz Group sold the property to PIMA. In February 2013, PIMA submitted its application to develop the project on the property and in May 2013, the City circulated a mitigated negative declaration ("MND") for the project in accordance with the requirements of the California Environmental Quality Act ("CEQA). The City received many letters of comment in response to the MND. The City, with input from PIMA, agreed that, in light of the comments received from the public, preparation of the environmental impact report ("EIR") was warranted. The draft EIR for the project was prepared and circulated for public review and comment from January 22, 2015 through March 9, 2015. The final EIR for the Project for the project was completed on June 16, 2016.

Environmental Background

After the completion of an Initial Study, a Mitigated Negative Declaration was originally prepared for the proposed project in May of 2013. In response to comments received from the public circulation of the Mitigated Negative Declaration, the City determined in consultation with the

applicant (PIMA Alameda Partners, LLC, aka. PIMA) to prepare an Environmental Impact Report (EIR) (ENV-2012-920-EIR, SCH No. 2014061030). A summary of the report preparation, impacts, and findings is further described herein under the CEQA Findings of Fact.

STREETS

Alameda Street, adjoining the subject property to the east, is an Avenue III that is currently dedicated to a variable right of way width at the project's street frontage. The approval of the Preliminary Parcel Map conditioned this street to provide a 12.5-foot wide variable-width and 8.5-foot strip of land dedication adjoining the project site to complete a 36-foot wide half right-of-way dedication in accordance with Avenue III based on the Mobility Plan designation, including a 20-foot radius property line return at the intersection of Alameda Street with 41st Street.

Martin Luther King Jr. Boulevard, adjoining the subject property to the north, is an Industrial Local Street that is currently dedicated to a width of 55 feet at the project's street frontage. The approval of the Preliminary Parcel Map conditioned this street to provide a 5-foot dedication to complete a 30-foot half right-of-way, including a 20-foot radius property line return at the intersection of Martin Luther King Jr. Boulevard with Alameda Street.

41st Street, adjoining the subject property to the south, is a Collector Street that is currently dedicated to a width of 60 feet at the project's street frontage. The approval of the Preliminary Parcel Map conditioned this street to provide a 22-foot dedication to complete a 52-foot wide half right-of-way dedication.

Long Beach Avenue, adjoining the subject property to the west, is a Boulevard I that is currently dedication to a width of 140 feet at the project's street frontage.

SITE PLAN REVIEW FINDINGS

1. **The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.**

   The project site is zoned M2-2 located within the Southeast Los Angeles Community Plan area, with a Light Manufacturing land use designation that corresponds to the MR2 and M2 Zones. The proposed use as a light industrial park that will contain garment manufacturing and supportive uses is consistent with the Light Manufacturing land use designation and is permitted within its underlying zones.

   The project site is a rectangular shaped property that totals approximately 12.9 acres, after deduction of dedication requirements. The property has a frontage on Alameda Street, Martin Luther King Jr. Boulevard, 41st Street, and Long Beach Avenue. The project is zoned M2-2 and is not located within a specific plan area. The Zone's Height District 2 is silent in regard to building height limitations, however the allowable Floor Area Ratio (FAR) is limited to 6:1. The site is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

   The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972

total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Surface parking will be located adjacent to the front and side facades of the four proposed buildings.

With no height limitations, nor density or yard requirements for industrial projects, the proposed development is in compliance with the M2-2 Zone requirements. The FAR proposed for each proposed parcel is well under the maximum 6:1 permitted in the M2-2 Zone. Parcel 1 proposes a building with a floor area ratio of 0.83 to 1. Parcel 2 proposes a floor area ratio of 0.95 to 1. Parcel 3 proposes a building with a floor area ratio of 0.83 to 1 and Parcel 4 proposes a building with a floor area ratio of 0.81 to 1. Collectively, these buildings will total a floor area ratio of 0.85 to 1 for the entire project site, pre-subdivision.

As described in the Southeast Los Angeles Community Plan, an overarching goal related to industrial designated land is that the Plan's industrial base is a major economic asset that should be preserved or redeveloped to accommodate emerging technologies, thus providing enhanced job base for the Community's population. The plan identifies that the existing industrial base is in poor condition and identifies opportunities for industrial growth in existing under-utilized and vacant industrial parcels, much like the subject site. The consolidation of the subject site to allow for the construction of a light industrial complex will address the Community Plan's identified issue of small industrial lot sizes and will seize an identified opportunity to develop new industrial parks that contain more than one operator.

As proposed, the project will involve the development of an underutilized industrial property as a light industrial, garment manufacturing complex. The complex will be composed of four industrial buildings, each of which will be located on a separate parcel. Each parcel and new building will be owned and operated by a separate garment manufacturing company and will be occupied by garment manufacturing, warehouse, and office uses. Collectively, the project is anticipated to employ approximately 994 permanent employees, which is twice as many employees as the identified companies currently collectively employ.

The subject property is zoned M2-2, which is consistent with the site's General Plan Land Use designation for Light Manufacturing uses under the Southeast Los Angeles Community Plan. The proposed industrial buildings will contain garment manufacturing, warehouse, and office uses that are permitted by-right in the M2 Zone.

In addition to being consistent with the Southeast Los Angeles Community Plan, the proposed industrial project is further in line with the City's General Plan Framework Element, which sets forth a comprehensive long-range growth strategy for the City and defines citywide policies regarding such pertinent issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. With regards to industrial land, it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents.

The proposed project contributes to the overarching Industrial Goal of the Southeast Community Plan. As planned, the project is consistent with its underlying zone and land use designation and will additionally support growth strategies, seize identified opportunities and

address issues of the General Plan Framework Element and the Southeast Community Plan. As such, the proposed project is in substantial conformance with the purposes, intent and provisions of the General Plan, and the applicable community plan.

2. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet.

The project site is located within the Southeast Los Angeles Community Plan area and has a Light Manufacturing land use designation with the corresponding M2-2 zone. The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

Height/Bulk/FAR:

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet. Building 2 consists of two stories that occupy approximately

133,680 total square feet. Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet. Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet.

With no height limitations, nor density or yard requirements for industrial projects, the proposed development is in compliance with the M2-2 Zone requirements. The FAR proposed for each proposed parcel is well under the maximum 6:1 permitted in the M2-2 Zone. Parcel 1 proposes a building with a floor area ratio of 0.83 to 1. Parcel 2 proposes a floor area ratio of 0.95 to 1. Parcel 3 proposes a building with a floor area ratio of 0.83 to 1 and Parcel 4 proposes a building with a floor area ratio of 0.81 to 1. Collectively, these buildings will total a floor area ratio of 0.85 to 1 for the entire project site, pre-subdivision.

Industrial and warehouse uses located to the north, south, and east of the project are developed with a similar scale, height, and massing as the proposed industrial park. These buildings appear to range from two to four stories in height and are developed in a similar manner where surface parking surrounds each structure. The properties located to the west of the property are separated by Long Beach Avenue and the Metro commuter light rail line and developed with two-story industrial structures and single-story residential buildings. While the small scale of the residential uses will differ from the proposed height of the industrial buildings that will be located along Long Beach Avenue, these structures will be buffered by a 140 foot right-of-way as well as landscaping with which the project has been designed and conditioned.

Setbacks:

The setbacks applicable to the project are established under Section 12.19-C of the LAMC, wherein front, side, and rear yard setbacks are not required for uses that are exclusively for commercial or industrial purposes.

The project site plan (Exhibit "A") indicates that the proposed structures will be setback approximately 65'-10" from Martin Luther King Jr. Boulevard and 41st Street and approximately 15' to 20' from Long Beach Avenue and Alameda Street. The project site plan is similar to nearby uses which typically contain industrial buildings that are surrounding by surface parking. The proposed project, however, will be additionally enhanced with landscaping located along all four street frontages.

Off-street Parking, Bicycle Parking, and Driveways:

A minimum of one parking space is required for every 500 square feet of the first 10,000 square feet of warehouse use, and one parking space is required for every 5,000 square feet of warehouse use in excess of the first 10,000 square feet. One parking space is required for every 500 square feet of manufacturing use. Where there is an office space auxiliary to a manufacturing, warehouse, or other industrial use on the same lot, the office use shall have its required parking spaces computed at the same ratio as the industrial space. However, if the office space exceeds 10 percent of the total gross floor area of a building, then the balance of the office space in excess of 10 percent shall have its required spaces computed at the ratio specified for office use. As a result, the project is required to provide 403 spaces and will provide one space in excess for a total of 404 spaces. Carpool

and vanpool spaces will be located adjacent to building entrances and EV-ready charging stations will be provided with underground electrical conduits.

In addition to automobile spaces, the building within the industrial park will provide bicycle parking in compliance with the Municipal Code. A total of 50 short term and 59 long term spaces are required and will be provided by the project, collectively. Each building will contain showers and lockers for employees who ride their bicycles to work.

Los Angeles Municipal Code Section 12.21-A.4, allows for newly required automobiles parking spaces to be replaced by bicycle parking at a ratio of one automobile space for every four bicycle spaces up to a maximum of 20 percent of the required automobile spaces. For the proposed project, up to 27 required automobile spaces could be replaced for bicycle parking. The project, however, has not replaced any of its required automobile spaces for bicycle.

In addition to providing adequate vehicular and bicycle parking spaces for employees, the project's location is in relatively close proximity to public transit options. The most proximate Blue Line metro rail stop is located immediately south of the project, near the corner of Long Beach and Vernon Avenues. This is approximately 1,700 feet south of the southwest corner of the subject site. In addition, the nearest bus stop is located to the west of the subject site, at the corner of 41st and Compton Street. This is approximately 1,400 feet east of the southwest corner of the subject site.

The project has been designed and conditioned to provide up to five driveways on Martin Luther King Jr. Boulevard and four driveways on 41st Street. Given that the project will be an industrial park with at least four operators located on site at any given time, the provision of multiple driveways will allow for ease of vehicular movement to and from the subject site. Such vehicular movement will include anything from large delivery trucks, to vanpools, individual vehicles, and bicycles. As depicted in the approved site plan, the project will be designed in a symmetrical layout with sets of structures that are separated by a central driveway. This driveway will connect Martin Luther King Jr. Boulevard and 41st Street.

Driveways are prohibited from being located on Alameda Street and Long Beach Avenue. The prohibition of driveways on these streets will result in minimum traffic impacts caused by vehicles entering and exiting off major thoroughfares and reduce impacts to the nearest sensitive impacts on Long Beach Avenue.

Loading/Trash Areas:

The loading areas for the industrial park will occur in locations that are specific to each proposed building. Buildings 1 and 3 have each been designed with two separate loading areas, which will allow for the option of more than one tenant to operate out of each building. Buildings 2 and 4 have each been designed with two, double-door loading areas. Loading areas for all new structures will either face Martin Luther King Jr. Boulevard or 41st Street. Zero loading areas will front on Alameda Street or Long Beach Avenue.

The site plan for the industrial park has been designed with a wider driveway aisle width in order to accommodate the maneuvering of delivery trucks and eliminate the propensity for such vehicles blocking the right-of-way of surrounding streets.

Individual trash enclosures will be provided for each structure. Similar to neighboring uses, such enclosures will be covered and accessible from the parking areas located along Martin Luther King Jr. Boulevard and 41st Street.

Lighting:

Lighting will be provided per LAMC requirements. The lighting, HVAC, and electrical systems in each building will meet or exceed the requirements of the City's Green Building Code. Each building will have operable windows on upper levels and skylights will be provided on the roof of each structure to reduce the need for artificial light. All buildings will be constructed with 4,000 amp electrical service to allow for future installation of rooftop solar panels and EV charging stations.

In light of the forgoing description of the industrial park's design that has planned with consideration of its surrounding uses, the project has been found to be compatible with existing and future development on adjacent properties and neighboring properties.

On-site Landscaping:

The proposed use is not required pursuant to the Los Angeles Municipal Code to provide open space, landscaped areas on-site. The project, however, will be constructed with landscaping that surrounds the entire site. A landscaped buffer, including trees, vines, and hedges will be provided along all interior site areas adjacent to the perimeter fence, except for areas reserved for pedestrian and vehicular areas. A total of 30,474 square feet of landscaping will be provided on-site and the project has been conditioned to plant one 36" box tree for every four parking spaces provided. This amount totals approximately 5.4% of the total site and 14.6% of the proposed parking areas.

3. **The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The proposed project involves the development of a light industrial park that will be occupied by garment manufacturing and associated warehouse and office uses. No residential uses are proposed. The proposed light industrial park is not subject to the City's open space requirements pursuant to LAMC Section 12.21-G,2, however, the project has been designed with landscaping in the surface parking area and will provide additional landscaped areas that will buffer the proposed use from neighboring properties. In addition, these provided landscaped areas will be installed with seated lunch areas for employees of the industrial park.

FINDINGS OF FACT (CEQA)

I. Introduction

The applicant, Tony Yu of Pima Alameda Partners, L.L.C., (the "project applicant" or "applicant") proposes to develop a 12.9 acre property located at 4051 S. Alameda Street (the "project site" or "site"), with an industrial park project. Additional addresses for the site include 1700-1838 (even nos. only) E. Martin Luther King, Jr. Boulevard; 1708-1835 E. 40th Place; 1707-1843 (odd nos. only) E. 41st Street; 4014 and 4066 S. Long Beach Avenue East; and 4015, 4017, 4051 S. Alameda Street. The site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. In relation

to major highways, the site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The site is rectangular in shape and is transected by a paved road (East 40th Place) through the central portion in an east-west direction. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. The project involves the vacation of two alleys and a street (40th Place) that run east-west through the site. These requests have been made and tentatively approved in conjunction with the related Preliminary Parcel Map project. Adjacent land uses consist of a recycling yard and industrial uses to the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon. The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

To evaluate the environmental impacts of the project in accordance with the California Environmental Quality Act ("CEQA"), the City of Los Angeles ("City") prepared a Draft Environmental Impact Report ("Draft EIR" or "DEIR"). The project, as proposed in the Draft EIR, would consist of the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. Collectively, these improvements are referred to herein as the project. The Draft EIR additionally considered a No Project alternative and as well as two operational alternatives to the same built project. The "No project" alternative also included a brief description of two project alternatives as a community garden and park or other recreational use.

II. Environmental Documentation Background

The project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 30-day period commencing June 17, 2014 and ending July 17, 2014. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Notice of Availability (NOA), which noted the completion of the NOP and Initial Study, was mailed directly to more than 64 interested parties and to 108 property owners and residents within a 500-foot radius of the proposed project site. The NOA of the NOP and Initial Study was also posted on the City's website, at: http://planning.lacity.org/eir/nops/ENV-2012-920-EIR_IS.pdf. The NOP and Initial Study document were available for review and posted at the Vernon Branch Library, located approximately 0.9 mile southwest of the proposed project site at 4504 South Central Avenue; the Junipero Serra Library, located approximately 1.9 miles southwest of the proposed project site at 4607 South Main Street; and the Los Angeles Central Library, located approximately 2.9 miles north of the proposed project site at 630 West 5th Street.

The Department of City Planning received seven letters of comment from public agencies and 225 comment letters or emails from members of the public and other interested parties (Appendix II, *Notice of Preparation Comment Letters* and Table I.A-1, *Initial Study Public Agency Comment Matrix*). An Initial Study was prepared to focus the environmental topic areas to be analyzed in the Draft EIR (Appendix III, *Initial Study*). The Initial Study prepared for the proposed project identified the contents of the Draft EIR, based on environmental issue areas anticipated to be potentially subject to significant impacts (Appendix III, *Initial Study*).

The Draft EIR evaluated in detail the potential effects of the project. It also analyzed the effects of a reasonable range of three alternatives to the project, including potential effects of a "No project" alternative. It also included a brief description of two alternatives that were withdrawn as being infeasible. These alternate land use alternatives were a community garden and a park or recreational use. The development of the property for such uses did not meet the basic objectives of the project to the same extent as the proposed project. Given the inconsistency that these alternate land use alternatives would have with the adopted Community Plan and existing land use designation and zoning, a detailed analysis of such uses was not completed. The Draft EIR for the project (State Clearinghouse No. 2014061030), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was completed and forwarded to the Governor's Office of Planning and Research (OPR), and a Notice of Completion (NOC) was posted at both OPR and the Office of Los Angeles County Clerk on January 22, 2015. Copies of the Draft EIR and Notice of Availability (NOA) were mailed to 350 representatives and interested parties. The Draft EIR was circulated for a 46-day public comment period beginning on January 22, 2015, which closed on March 9, 2015, beyond the 45 days required by CEQA Guidelines Section 15105(a). Although the 46-day comment period closed on March 9, 2015, at 5 p.m., the City received and accepted the submittal of thirteen (13) late letters of comment from individuals and one (1) late letter of comment from a City agency. In total, the City received seven (7) letters of comment from agencies and eight-one (81) letters of comment from individuals and organizations. Copies

of the written comments received during the 46-day public review period are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The City released a Final EIR for the project on June 16, 2016, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with implementation of the project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was also made available for review on the City's website. Hard copies of the Final EIR were also made available at four libraries and the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the project site as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the project was held by the Deputy Advisory Agency on July 6, 2016.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Environmental Review Section, 200 North Main Street, Room 750, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. Findings Required to be Made by Lead Agency Under CEQA

Section 21081 of the California Public Resources Code and Section 15081 of the CEQA Guidelines require a public agency, prior to approving a project, to identify the project's significant impacts and make one or more of three possible findings for each of the significant impacts.

The three possible findings are:

A. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR (CEQA Finding 1)

B. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (CEQA Finding 2)

C. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR (CEQA Finding 3).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set

forth therein. Section 15091 of the CEQA Guidelines requires findings to address environmental impacts that an EIR identifies as "significant." For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact.

2. Project Design Features – Reference to the identified Project Design Features that are a part of the project (numbering of the features corresponds to the numbering in the Draft EIR)

3. Regulatory Compliance Measures – Reference to the Identified Regulatory Compliance Measures that are a part of the project (numbering of the measures corresponds to the number in the Draft EIR)

4. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures correspond to the Mitigation Monitoring and Reporting Program, which is included as Section IV of the Final EIR).

5. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.

6. Rationale for Finding – A summary of the reasons for the finding(s).

7. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

IV. Description of the Project

A. Project Location and Surrounding Uses

The project site is located within Southeast Los Angeles, is bordered by the City of Vernon to the east, and is located approximately 6.5 miles north of the City of Compton. The site is located approximately 1 mile south of Interstate 10 and approximately 2.2 miles east of State Highway 110.

The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly to the west is the Metro commuter light rail line, which separates the industrial zone of the project area with single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity.

The proposed project site is bounded by East Martin Luther King, Jr. Boulevard to the north; South Alameda Street to the east; East 41st Street to the south; and Long Beach Avenue to the west. Adjacent land uses consist of a recycling yard and industrial uses to

the north across Martin Luther King Jr. Boulevard in the M3-1 Zone; industrial and warehouse uses and the Los Angeles Regional Food Bank to the south across 41st Street in the M2-2 Zone; the Union Pacific Railroad right-of-way to the west across Long Beach Avenue in the M1-1 Zone; warehouse uses farther west across Long Beach Avenue West in the M1-1 Zone; and the Union Pacific Railroad right-of-way to the east across Alameda Street and commercial and warehouse uses farther east in the City of Vernon.

B. Existing Conditions

1. Site Improvements

The subject site is approximately 12.9 net acres, is currently vacant, absent of any trees or significant shrubbery, and is overgrown with scattered weeds and grasses.

2. Land Use and Zoning Designation

The project site is zoned M2-2 located within the Southeast Los Angeles Community Plan area, with a Light Manufacturing land use designation that corresponds to the MR2 and M2 Zones. The purpose of the M2 zoning classification is to allow for lower-impact industrial uses such as clothing design and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales. Light industry also includes a variety of "neighborhood industrial services" that benefit from the close geographic relationship to customers, wholesalers, and related services. Such uses include animal hospitals and kennels, automobile service and painting, lumber yards and specialty construction materials. The proposed use as a light industrial park that will contain garment manufacturing and supportive uses is consistent with the Light Manufacturing land use designation and is permitted within its underlying zone.

3. Project Characteristics

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building

have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5 street widening on the north and 12.5' street widening on the south of South Alameda Street
- 22' street widening on 41st Street

Pedestrian/vehicular conflicts would be minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip.

V. Environmental Impacts Found to be Less than Significant by the Initial Study

The City Planning Department prepared an Initial Study that is located in Appendix I of the Draft EIR. In accordance with CEQA Guidelines section 15128, the FEIR described categories of potential effects that were not found to be significant and were therefore not discussed in detail in the FEIR. An Initial Study was prepared for the Project in June 2014 and is included as Appendix III in the FEIR. The Initial Study indicates why the Project's potential effects on these issues were determined not to be significant and were therefore eliminated from further consideration in the FEIR. The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed:

- Aesthetics
- Agricultural And Forest Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

A. Aesthetics

The proposed project would not result in impacts to aesthetics in relation to scenic vistas, scenic vistas within a state scenic highway, or degradation of visual character and quality, and the proposed project would result in less than significant impacts to aesthetics in relation to creation of a new source of substantial light or glare.

1. Scenic Vistas

The City of Los Angeles has not designated any scenic vistas within the proposed project area or any area that would be affected by the development of the proposed project area. The nearest unique urban or historic features within the Southeast Los Angeles Community Plan Area (CPA) include Watts Towers (located nearly 5 miles south of the proposed project site) and established historic areas along Central Avenue, north and south of Vernon (located approximately 0.75 mile west of the proposed project site). Existing buildings, trees, and infrastructure shield the proposed project site from view from these unique features.

2. Scenic Resources within a State Scenic Highway

The nearest designated historic parkway is 6 miles of Interstate Route 110 (Arroyo Seco Historic Parkway), located approximately 5 miles north of the proposed project site; the nearest officially designated scenic highway is 55.1 miles of State Route 2 (Angeles Crest Highway), located approximately 15.5 miles to the north of the proposed project site; and the nearest eligible scenic highway is Interstate Route 210 west of its intersection with State Route 134, located approximately 11 miles north of the proposed project site. The proposed project site cannot be viewed from any of these highways, due to distance.

3. Visual Character and Quality

The proposed project would replace the currently vacant and undeveloped approximately 13-acre site in a Light Industrial zone with approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space with subsequent parking lots in 37- to 40- foot-high two-story structures with surface parking. The proposed project would be similar in mass to several existing buildings in the immediate vicinity of the project site but approximately 7 to 27 feet taller than the buildings immediately surrounding the project site. However, the development of the proposed industrial park, the construction of four industrial buildings in an industrial zone, is consistent with the City of Los Angeles Municipal Code, which places no height restrictions or setbacks on industrial development within the M2 Light Industrial zone. The proposed project is consistent with the City of Los Angeles General Plan's aesthetic policies for industrial development in the Southeast Los Angeles CPA, including the design standards established for industrial development in the Urban Design Chapter of the Southeast Los Angeles Community Plan, because the proposed structures are oriented toward the main commercial street (with office space facing 41st Street and Martin Luther King, Jr. Boulevard); a landscape buffer separates the public streets from the parking lots; pedestrian/vehicular conflicts are minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip; the buildings have been designed with windows, doors, and decorative concrete panels on the surfaces facing the street that address pedestrian scale; trash areas have been enclosed; mechanical roof equipment will be completely screened from view; and the on-site lighting is directed downward to limit the nighttime light and glare that reaches the nearby residential uses. The proposed project is also consistent with the City's policy to achieve adequate compatibility through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses because the proposed project site is not directly adjacent to a residential neighborhood or commercial use and the western facades of the proposed project that will be seen from residences are comprised of

decorative concrete panels that provide a pedestrian scale. The proposed project is consistent with the City of Los Angeles General Plan and the City of Los Angeles Municipal Code for a Light Industrial zone in the Southeast Los Angeles CPA. Therefore, there would be no expected significant impacts to aesthetics related to degradation of the existing visual character of the site and its surroundings.

4. Light and Glare

The proposed project has been designed to provide on-site lighting that avoids impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed project area. The proposed project involves the construction of four industrial buildings, all of which contain shielded exterior area lighting wall packs mounted to the face of the building at 29 feet above the finished floor and solar blue reflective glazing in anodized aluminum frames. The exterior lights will contribute to sources of light and the reflective windows have the potential to contribute to a source of glare in the proposed project area. However, the exterior lights on the buildings have been designed to be shielded downward and the windows on the western face of the building have been positioned to the north of the nearest residence to reduce glare to a less than significant level. The proposed project site is currently vacant, with seventeen 24- to 30-foot-high street lamps located on the sidewalk surrounding the site that constitute existing sources of light and glare. The Metro Blue Line (located to the west of the proposed project site) and the Alameda Corridor (located to the east of the proposed project site) provide periodic sources of nighttime light and glare. The proposed project site is located in an urbanized area, and the surrounding light industrial and warehouse uses typically utilize moderate levels of interior and exterior lighting for security, parking, signage, architectural highlighting, and landscaping. The streets in the area are lined with light fixtures for visibility and safety purposes, and the high volume of truck traffic on the streets surrounding the proposed project site contributes to overall ambient lighting levels, especially from Alameda Street. As indicated in the project description, the proposed project has been designed to comply with the goals and policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan for industrial development, which include (1) the installation of on-site lighting along all pedestrian walkways and vehicular access ways and (2) the shielding and directing of on-site lighting onto driveways and walkways, and away from residential uses. The Southeast Los Angeles Community Plan does not specify light and glare restrictions in relation to surrounding industrial uses. In order to be consistent with the policies of the City of Los Angeles General Plan, the proposed project design provides nighttime lighting for safety and includes nighttime light shielding for the nearest residence.

B. Agriculture and Forest Resources

The proposed project would not result in impacts to agriculture resources in relation to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflicts with existing zoning for agricultural use or a Williamson Act contract; conflicts with existing zoning for forest land or timberland; loss of forestland or conversion of forest land to non-forest use; or other changes that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

1. Agriculture

The proposed project site is not designated as or suitable to be designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The California Department of Conservation (CDC) Farmland Mapping and Monitoring Plan (FMMP) has identified the area as Urban and Built-Up Land at the statewide scale and the area has not been surveyed at the County scale. There are no Farmlands located in or immediately adjacent to the proposed project site. Although the proposed project site was used for urban gardens with individual plots available to the community from circa 1994 to 2006, the site was cleared of that use as a result of a court decision in 2006 upholding sale of the property to the applicant and is currently vacant land with no permanent structures or occupied uses. No agricultural uses or related operations are present within the site or surrounding area. Due to its urban setting, the site area is not included in the FMMP. The nearest agricultural land use zone within the City's jurisdiction is a cemetery located in Boyle Heights at least 2.5 miles east of the proposed project site. The proposed project site and surrounding communities are not enrolled in a Williamson Act contract. The City of Los Angeles Zoning Plan has designated all of the parcels that comprise the proposed project site as M2: Light Industrial for light manufacturing. One parcel within the Southeast Los Angeles Community Plan Area in the neighborhood of Watts is zoned for A1 agriculture, but there are no parcels in the Southeast Los Angeles Community Plan Area currently used for agriculture.

2. Forestry Resources

The proposed project site and adjacent properties have been designated as M1: Limited Industrial, M2: Light Industrial, and M3: Heavy Industrial zones. There are no forest resources located at the property, nor were such resources historically located at the property. The property has been developed since circa 1920 according to the City's Sanborn maps. The site is designated for Light Industrial use and is currently vacant.

C. Biological Resources

The proposed project would not result in impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts; species recognized by the U.S. Fish and Wildlife Service (USFWS) as federal species of concern or by the California Department of Fish and Wildlife (CDFW) as a California Species of Special Concern (SSC); locally important species; riparian habitat or other sensitive natural communities; federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; movement of any migratory fish or wildlife species or with an established wildlife corridor; conflicts with any local policies or ordinances protecting biological resources; or conflicts with the provisions of any adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Due to the lack of habitats suitable to support species listed as rare, threatened, or endangered, sensitive species, locally important species, as confirmed during a site visit, they have been determined to be absent from the proposed project site. Based on a record search and site visit, there is no riparian habitat or any other state-designated sensitive natural communities on the subject property, and there are no wetlands or other waters of the United States afforded protection pursuant to Section 404 of the Federal Clean Water Act within the subject property. Suitable habitat is not present to support wildlife movement corridors at the proposed project

site. The proposed project is consistent with the applicable goals and policies of the Conservation Element of the City of Los Angeles General Plan. The proposed project site is not within the jurisdiction of any adopted or proposed HCP or NCCP.

The proposed project would result in less than significant impacts in relation to impeding the use of native wildlife nursery sites in relation to ground or shrub-nesting native birds. The applicant has agreed to remove all vegetation prior to construction during the non-breeding season (generally October 15 to February 15) to ensure that the project site does not provide suitable nesting habitat for birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA). As indicated in the project description, a qualified biologist will conduct a pre-construction nesting bird survey throughout all construction impact areas no more than 3 days prior to the initiation of construction work. If a protected native bird nest is found, all construction disturbance activities within 300 feet of the nest will be delayed until the nest is vacated and juveniles have fledged. If no native protected nesting sites are found, construction will be allowed to proceed.

D. Geology and Soils

The proposed project would not result in impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides; in relation to substantial soil erosion and loss of topsoil; or from being located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The proposed project site is situated on relatively level ground and is not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. According to the California Division of Mines and Geology (CDMG), the site is not situated within a Seismic Hazard Zone. The proposed project intends to cut approximately 3,600 cubic yards of dirt/soil, fill 4,000 cubic yards, and import and additional 400 cubic yards. All dirt/soil disturbed during excavation and grading will remain on the proposed project site. Additionally, the proposed project consists of four warehouse/industrial buildings and subsequent parking lots that will require the entirety of the proposed project site to be paved over with concrete. The proposed project would not require the use of septic tanks or alternative wastewater disposal systems, as sewers are available for wastewater disposal at the proposed project site. Furthermore, wastewater generated by the proposed project would be treated at the Hyperion Treatment Plant (HTP) located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. The HTP currently supports wastewater from the proposed project site and would continue to do so following the development of the proposed project.

The proposed project would result in less than significant impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking; from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction; from being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or from being located on expansive soil creating substantial risks to life or property. The proposed project site is not located within an Alquist-Priolo Special Study Area, a Fault Rupture Study Area, a Liquefiable Area, a Potentially

Liquefiable Area, or a State of California designated Seismic Hazard Zone for liquefaction hazards. The peak ground acceleration at the proposed project site is judged to have a 475-year return period and a 10 percent chance of exceedance in 50 years, and the proposed project would be developed in accordance with the requirements of the California Building Code (CBC) and the Uniform Building Code (UBC). Seismic settlement calculations conducted by Sladden Engineering indicate potential total seismic settlement of up to 0.68 inches, which are expected to be less than one-half of the total seismic settlement. Accordingly, risks associated with seismic settlement should be considered low. Subsurface investigations conducted by Sladden Engineering did not encounter groundwater within a depth of 50 feet or less. The materials underlying the proposed project site are determined to have a "very low" expansion potential.

E. Hydrology and Water Quality

The proposed project would not result in impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area, placement of structures (other than housing) within a 100- year flood hazard area, the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow. No residential uses are proposed, and the project site is not located within or near a 100-year floodplain, as indicated on the City of Los Angeles Safety Element 100-Year and 500-year Flood Plains delineation map. The project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown by the City of Los Angeles Safety Element Inundation and Tsunami Hazard Areas map.

The proposed project site is not located within inundation and tsunami hazard areas delineated in the City of Los Angeles Safety Element. The proposed project would result in less than significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements, groundwater supplies or groundwater recharge, alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site, alteration of existing drainage patterns in a manner that would result in flooding on site or off site, exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff, substantial degradation of water quality.

1. Water Quality Standards and Waste Discharge

The total proposed project site encompasses approximately 13 acres, and therefore, construction activities would be subject to the requirements of a NPDES Permit issued by the Regional Water Quality Control Board (RWQCB). The National Pollutant Discharge Elimination System (NPDES) General Construction Permit requires that all developers of land where construction activities will occur over more than 1 acre (1) develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. The SWPPP typically includes minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (e.g., the minimization of impervious surfaces, treatment of stormwater runoff, etc.). As described in the Initial Study (Appendix III), although the proposed project would result in a less than significant impact with regard to water quality, the project applicant has agreed to incorporate the following design measures to ensure compliance with the City of Los Angeles Green Streets Policy:

- The project shall comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board, U.S. Environmental Protection Agency, and local agencies regarding water quality.

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

- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

- The legibility of signs and stencils discouraging illegal dumping shall be maintained.

- Materials used on-site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to: a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs. The storage area must be paved and sufficiently impervious to contain leaks and spills and must have a roof awning to minimize collection of storm water within the secondary containment area.

- The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department, binding to the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan (SUSMP) and/or per manufacturer's instructions.

Compliance with the requirements of the NPDES Permit and the SUSMP would ensure that the construction or operation of the proposed project would not violate any water quality or waste discharge requirements.

2. Groundwater

The proposed project would not require the use of groundwater. The increase of impervious areas resulting from the proposed project could reduce percolation, which could result in a reduction in groundwater recharge. However, compliance with City SUSMP requirements would percolate up to 0.75 inch of captured rainfall over a 24-hour period to provide additional recharge. Thus, the extent to which local groundwater supplies would be substantially depleted would be limited.

3. Drainage Patterns

There are no streams or rivers located in the immediate vicinity of the project site; however, the Los Angeles River is located approximately 1 mile east-northeast of the project site. The project site consists of an approximately 13-acre vacant lot with scattered weeds and grasses. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with the required provisions of the SWPPP would eliminate erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow some percolation and reduction of runoff, and the increase in surface runoff would not be substantial. Under the proposed project, storm water or any runoff irrigation waters would be directed into existing storm drains. Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping and compliance with SUSMP requirements would allow for percolation and a reduction of runoff, and the increase in surface runoff would not be substantial.

4. Runoff

Since the existing project site is mostly permeable, impermeable surfaces resulting from the development of the proposed project would increase the volume of storm water runoff. New areas of landscaping would allow for percolation and a reduction of runoff, and water runoff after development would not exceed the capacity of existing or planned drainage systems. In addition, with the implementation of the required SWPPP during construction and the SUSMP during project operation, any potential sources of polluted runoff would be effectively controlled. The proposed project would not create or contribute runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Additionally, as described above, the proposed project has been refined to meet the City of Los Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

5. Water Quality

Project construction would occur in accordance with standard procedures established by the RWQCB. Project compliance with the City's SUSMP requirements would minimize potential water quality impacts during project operations. Furthermore, as described by Design Measures 60 through 65, the proposed project would require BMPs to minimize run-on and runoff of storm water and the potential for material spills to be transported to the storm water conveyance system. Additionally, as described in the Project Description of this Draft EIR, the proposed project has been refined to meet the City of Los Angeles Green Streets Policy in regard to BMPs for the landscaping and sidewalk that would facilitate filtration and infiltration of stormwater runoff.

F. Mineral Resources

The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource and in relation to the loss of

availability of a locally important mineral resource recovery site. No mineral extraction operations currently occur or have occurred on the proposed project site, and there are no active or abandoned mines or oil fields in the vicinity of the proposed project. Based on a review of the California Geological Survey (CGS), the proposed project is located within an Mineral Recovery Zone (MRZ)-2 zone. However, the property is designated for light industrial use in the Framework Element of the City General Plan. The property and much of the area in the vicinity of the proposed project was developed as industrial prior to the MRZ classification system, thus these properties are not available for commercial mining activities. Furthermore, the proposed project, as currently proposed, will not result in a loss of soil at the proposed project site, and therefore, potential mineral resources will not be disturbed. Cut and fill is proposed to be balanced on-site; therefore, there will be no net loss of sand and gravel resources from the property as a result of construction. According to the Conservation Element of the City's General Plan, sites that contain potentially significant sand and gravel deposits, which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. The proposed property and much of the area in the vicinity of the proposed project was developed as an industrial area prior to the MRZ classification system, thus these properties are not available for commercial mining activities.

G. Noise

The proposed project would not result in impacts to noise in relation to public airports or private airstrips. There are no public airports or public use airports or private airstrips located within a 2-mile radius of the proposed project site. The proposed project would result in less than significant impacts to noise in relation to noise-related exposure or generation of noise levels in excess of established standards from the proposed project, generation of excessive ground-borne vibration or ground-borne noise, permanent increases in ambient noise levels as a result of operation of the proposed project, or temporary or periodic increases in ambient noise levels from the proposed project.

1. Construction Noise

During construction of the proposed project, sensitive receptors will be exposed to noise levels above the thresholds set forth in the City's CEQA Threshold Guide, which states that a project would have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibel (dBA) or more at a sensitive receptor. In order to ensure compliance with the City's existing noise regulation, the applicant has committed to use temporary noise barriers during outdoor construction activities. The temporary noise barrier shall be installed at the western boundary of the proposed project site, along Long Beach Avenue (Figure III.B-3, Temporary Noise Barrier). As demonstrated in the noise analysis conducted in support of the Initial Study, the use of temporary noise barriers during construction is sufficient to ensure compliance with the City Noise Ordinance. (See also Appendix IS-1, Noise Technical Report, to the Initial Study, which is Appendix III of this Draft EIR.) However, with the incorporation of a temporary noise barrier along the western boundary of the proposed project site as a project design element, the proposed project would not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus would be in compliance with the City's noise regulation.

2. Operational Noise

The proposed project's ongoing operation would require building mechanical equipment to ventilate the indoor air quality and provide power for everyday operations. Typical mechanical equipment would include HVAC systems, transformers, and elevators. The proposed project's mechanical equipment would be designed to comply with the City's Noise Regulation requirements and a significance threshold of 5 dBA above the ambient noise levels. The greatest noise level generated by typical building equipment at a distance of 50 feet is 61 dBA, which is well below the significance threshold of 73.3 dBA. Furthermore, noise generated from mechanical equipment is generally absorbed and or sheltered by on-site structures and buildings, further reducing noise levels. Considering that the nearest sensitive receptor is 153 feet away from the proposed project site, operational noise impacts associated with mechanical equipment would be less than significant. The proposed surface parking lot on the proposed project site would generate some noise during operation of the proposed project. Potentially audible sources of noise from the surface parking lot would include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. These sources typically range from about 30 to 66 dBA and are generally short-term and intermittent. The greatest potential noise level generated by typical parking lot sources at a distance of 50 feet is 66 dBA, which is below the significance threshold of 78.3 dBA.

H. Population and Housing

The proposed project would not result in impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, or in relation to displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. There is no existing housing or housing being currently constructed within the currently vacant site; therefore, there will be no displacement of housing necessitating the construction of replacement housing. The unemployment rate is approximately 13 percent; therefore, there is sufficient local labor to satisfy employment; therefore, the proposed project would not generate a demand for additional housing in the vicinity of the proposed project. There are no people currently residing on the proposed project property. The proposed project property consists of a vacant site. The proposed project site is zoned for light industrial use and the proposed project is an industrial park that does not involve displacement of housing or people.

The proposed project would result in less than significant impacts to population and housing in relation to inducing substantial direct or indirect population growth. The proposed project will facilitate the transfer of 580 jobs from existing nearby locations and the addition of 410 jobs and is, therefore, consistent with the City of Los Angeles' intent to provide industrial job opportunities for residents through the development of a new industrial park. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences within the Community Employment Area, a 3-mile radius of the proposed project site, with priority given to qualified individuals that reside within one mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The project applicant has also entered into a local hire agreement for the operational phase of the project. Fifty-two percent of the four companies' employees will live within a 3-mile radius of the proposed project site. The Southeast Los Angeles Community Plan, a part of the Land Use Element

of the City of Los Angeles General Plan, and the City of Los Angeles Zoning Code have designated the proposed project site as light industrial land use (Zone "M2-2") and the proposed project would involve the construction of an industrial park consisting of four new buildings for warehouse and manufacturing space, parking lots for each building, and utilities. The proposed project is consistent with the City of Los Angeles General Plan's policies for industrial development in the Southeast Los Angeles CPA.

I. Public Services

The proposed project would not result in impacts to public services in relation to schools, parks, and other public facilities.

1. Schools, Parks, Libraries, and Hospitals

The proposed industrial park is a nonresidential use and would therefore not directly generate school-age children. The proposed project is an industrial park consisting of warehouse space, manufacturing space, office space, and parking lots, and it does not include the construction or expansion of residential use, and would therefore not directly generate an increase in population. It is expected that the new employees would be drawn from the existing labor force in the area pursuant to the Local Hire Agreement between Poetry, Impact, Miss Me, and Active Companies and the Coalition for Responsible Community Development and Los Angeles Job Corps. The proposed project site is vacant and zoned for light industrial use in an industrial area that is not appropriate for a park due to air quality issues. In addition, the project applicant has made a cash contribution to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located. The proposed project would not directly generate any substantial new demand for public facilities such as schools, parks, libraries, or hospitals because it would not directly generate an increase in population.

2. Fire

The proposed project would result in less than significant impacts to public services in relation to fire protection. Fire services to the proposed project site are provided by the City of Los Angeles Fire Department (LAFD). A significant impact would occur if the project required the construction of LAFD facilities to provide an engine company or truck company to serve the project site. The Los Angeles Municipal Code Section 57.09.07 establishes a maximum response distance from a fire station for an industrial use of 1 mile. Consistent with the requirements of the City General Plan, primary response to the project site would be provided by Fire Station No. 14, located 0.8 mile west of the proposed project site. Secondary responders are also located within close proximity of the project site: Fire Station No. 21, located 1.0 mile southwest of the proposed project site; and Fire Station No. 17, located 1.2 miles northeast of the proposed project site. The nearest fire station is Vernon Fire Department Fire Station No. 2, located 0.6 mile east of the proposed project site at 4305 South Santa Fe Avenue, Vernon, California 90058; however, the site is not located within the Vernon Fire Department's jurisdiction, which means the proximity of the station is only relevant in the case of a major fire in which the LAFD may require assistance. Given the location of Fire Station 14 (within 1 mile of the proposed project site) for providing service to the proposed project, fire protection services are determined to be adequate.

3. Police

The proposed project would result in less than significant impacts to public services in relation to police protection. Police protection services to the proposed project site are provided by the City of Los Angeles Police Department (LAPD). The proposed project site is located within the Newton Division, under the jurisdiction of the Central Bureau. The site is served by the Newton Community Police Station, located at 3400 South Central Avenue, Los Angeles, California 90011, 1.3 miles west of the proposed project site address via police vehicle (distance is approximately 1.2 miles west). The crime rate in the Newton Division was 61.7 arrests per 1,000 residents in 2011, compared to 42.4 arrests per 1,000 residents citywide; and the traffic accident rate in the Newton Division was 13.9 accidents per 1,000 residents, compared to 12.0 accidents per 1,000 residents citywide. As described in the project description, the proposed project has been designed to incorporate security provisions including fencing with automatic gates, lighting at night around all four buildings, and full-time security guards to mitigate for the increased security risks. Controlled access to buildings, hired security guards, and illumination of public and semipublic spaces would minimize opportunities for criminal activity, therefore reducing the demands placed upon police protection services. The security elements of the project are consistent with the provisions of the City of Los Angeles General Plan and would not warrant the construction of a new Police Station of Substation.

4. Recreation

The proposed project would not result in impacts to recreation in relation to the increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration from the proposed project or as a result of existing recreational facilities or proposed construction or expansion of recreational facilities.

5. Use of Existing Neighborhood and Regional Parks

The impact to recreation related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration from the proposed project was avoided through a cash pledge to support maintenance and improvements to existing parks located in close proximity to the proposed project. The proposed project has the potential to result in an increase in the use of parks due to the new employment associated with the proposed project. The nearest neighborhood park (service radius: half a mile) in the City of Los Angeles to the proposed project site is Central Avenue Jazz Park, located 0.94 mile west of the proposed project site at 4222 Central Avenue, Los Angeles, California 90011. As no parks are located within a half mile of the proposed project site, the proposed project site is not served by a neighborhood park. However, according to the Southeast Los Angeles Community Plan, the Ross Snyder Recreation Center and Fred Roberts Recreation Center provide neighborhood park services to the Southeast Los Angeles CPA. The Ross Snyder Recreation Center (11 acres) is located approximately 0.3 mile west of the proposed project site at 1501 E 41st St, Los Angeles, California 90011, and provides an artificial turf soccer field, barbecue pits, basketball courts, a baseball diamond, children's play area, picnic tables, seasonal pool, tennis courts, and volleyball courts. Additionally, the Fred Roberts Recreation Center (2.9 acres) is located approximately 0.4 mile south of the proposed project site at 4700 Honduras Street, Los Angeles, California 90011, and provides picnic tables and B-B-Q pits, basketball courts, children's play area, a community room, a soccer field, and volleyball courts.

The two nearest regional parks (larger than 100 acres) to the proposed project site are Elysian Park, located approximately 4.2 miles north of the proposed project site at 835 Academy Rd, Los Angeles, California 90012; and Earvin "Magic" Johnson Recreation Area, located approximately 5.9 miles south of the proposed project site at 905 E El Segundo Blvd, Los Angeles, California 90059.

According to the City of Los Angeles General Plan, the current population is not adequately served by the existing parks within the Southeast Los Angeles CPA, which means that a potential population increase due to the new employment associated with the proposed project would increase the park deficiency in the area. However, there are no anticipated growth-inducing impacts from the proposed project. The proposed project is not expected to significantly increase the population because it will facilitate the transfer of 590 jobs from existing nearby locations and the addition of 420 jobs under a local hire agreement for the construction and operation of the project in which future employees will be hired primarily from residences within the Community Employment Area, within a 3-mile radius of the proposed project site, with priority given to qualified individuals who reside within 1 mile of the proposed project site, before all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Additionally, the project applicant has agreed to provide the City of Los Angeles Department of Recreation and Parks with the funds (equivalent to the provision of 2.6 acres, calculated in local Quimby fees) to dedicate park land pursuant to the 2003 settlement agreement regarding the proposed project site, which will allow the City to dedicate a park.

6. Construction or Expansion of Recreational Facilities

The proposed project is an industrial park consisting of warehouse space, manufacturing space, and parking lots, and it does not include the construction or expansion of recreational facilities. The proposed project will be partially supported through transfer of employees from local sites and expansion of employment, and therefore there is no anticipated need to construct or expand the existing recreational facilities that serve the region. The project has committed to a local hire agreement for the construction and operations phases of the project, thus resulting in a commitment that 52 percent of the employment will be composed of individuals who live within a 3-mile radius of the project. In addition, the project applicant has made a cash pledge to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the proposed project is located.

VI. Environmental Impacts Found to be Less than Significant After Mitigation

The City finds that the following environmental impacts identified in the FEIR are potentially significant but can be mitigated to a less than significant level. Other impacts set out below were determined to be less than significant, but were considered in full in the FEIR. The potentially significant impacts and the mitigation measures which will reduce them to a less than significant level are set out in the FEIR and are summarized as follows:

A. Air Quality

1. Potential Impact

As indicated in the FEIR, the proposed Project would have a significant effect on air quality for PM_{10} emissions during construction. Therefore, the proposed Project would have a significant effect on air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

2. Finding

Pursuant to Public Resources Code Section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the significant effect on air quality to a less than significant level.

3. Rationale

Construction Phase

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the proposed project site. Fugitive dust emissions would primarily result from site preparation (i.e., grading) activities, whereas NOx emissions would primarily result from delivery and hauling of construction materials and equipment, the use of heavy-duty construction equipment, and the construction workers' commute trips to and from the proposed project site. The assessment of construction air quality impacts considers each of these potential sources during each part of the construction phase. Although construction emissions can vary substantially from day to day, depending on the level of activity and the specific type of operation, and the fact that fugitive dust emissions can vary based on the prevailing weather conditions, the analysis considers a worst-case scenario with concurrent use of construction equipment to ensure that impacts are not underestimated.

The daily regional construction emissions for the proposed project were estimated using the CalEEMod, version 2013.2.2, emissions model (Table IV.B-8, Unmitigated Estimated Daily Regional Construction Emissions). The proposed project would have a significant impact on air quality for PM (Particle Matter) 10 emissions during construction. In the absence of mitigation measures, PM10 emissions would exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. All other criteria pollutants are anticipated to be below the SCAQMD significance thresholds.

The SCAQMD has adopted the following criteria for determining consistency with regional plans and the regional AQMP: (1) identifying whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and (2) identifying whether a project would exceed the assumptions utilized in preparing the AQMP.

With respect to the first criteria, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable

air quality standards. As discussed in more detail above, the proposed project would result in construction-related PM10 emissions that exceed the SCAQMD significance threshold by approximately 5.6 pounds per day. However, with respect to construction related emissions, these emissions would be temporary in nature, lasting only for the site preparation/grading/excavation phases (approximately 3 months), and would not have a long-term impact on the region's ability to meet state and federal air quality standards. In addition, the proposed project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the proposed project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting SCAQMD rules and regulation, the proposed project's construction activities will be consistent with the goals and objectives of the 2012 Final AQMP to improve air quality in the Basin.

With regard to the second criterion, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. According to the Population and Housing section of the Initial Study prepared for the proposed project (Appendix III), the proposed project will be transferring 580 jobs from existing nearby locations, and adding approximately 400 new jobs, which is consistent with the City's Southeast Los Angeles Community Plan. In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project in which future employees will be hired primarily from residences with the Community Employment Area, a 3-mile radius of the proposed project site, with priority given to qualified individuals that reside within one mile of the proposed project. Therefore, the proposed project is not anticipated to induce substantial population growth in the vicinity of the proposed project site, and would be consistent with both the SCAG and AQMP growth projections.

As was discussed in the Draft EIR, the proposed project's construction emissions from PM10 would exceed the SCAQMD's significance threshold by approximately 5.6 pounds per day. Therefore, the proposed project would have a significant impact to air quality in relation to violating an air quality standard during construction, requiring the consideration of mitigation measures.

The greatest potential for toxic air contaminant (TAC) emissions during construction would be diesel particulate emissions associated with the use of heavy-duty equipment during construction activities. TAC emissions associated with construction of the proposed project have been analyzed by using the standard health risks assessment methodology to determine "Individual Cancer Risk" of a person continuously exposed to TACs over a 70-year lifetime.

The Office of Environmental Health Hazard Assessment (OEHHA) has developed a methodology for estimating health risks from TAC pollutants such as diesel exhaust from construction equipment. OEHHA has developed a DPM inhalation non-cancer (long-term) reference exposure level (REL) of 5 micrograms per cubic meter (µg/m3). No non-cancer acute (short-term) REL has been established for DPM.

Although a cancer risk factor has been established for DPM, the OEHHA HRA cancer risk factors assume a continuous exposure over a 70-year timeframe. Because the construction schedule estimated that the phases which require the most heavy-duty

diesel equipment usage, such as site grading and excavation, would last for a much shorter duration (i.e., approximately 3 months), construction of the proposed project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance document does not recommend an HRA for short-term construction emissions. Therefore, the HRA is not meaningful to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, there would be no residual emissions after construction and no corresponding individual cancer risk. As such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and project-related TAC emissions impacts during construction would be less than significant.

During the proposed project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finished, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113, Architectural Coatings, limits the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. Although these odors could be a source of nuisance to adjacent uses, they are temporary and intermittent in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, impacts associated with objectionable odors during construction would be less than significant.

Operational Phase

Operation and maintenance emissions at the proposed project site are likely to result from energy consumption and on-road mobile sources associated with employee commutes and delivery of manufactured goods. Additionally, operational emissions will be generated from area sources including consumer products that contain solvents, landscaping that uses fuel-powered equipment, and on-site emergency generators.

Operation of the proposed project would not introduce any substantial new on-site sources of air pollution. As is indicated in Table IV.B-9, the proposed project is expected to generate daily emissions of criteria pollutants well below the SCAQMD significance threshold. As such, no mitigation measures related to air quality are required for operation of the proposed project. It is also important to note that the estimated emissions are likely to be higher than actual emissions from the proposed project due to the conservative assumptions used for emission modeling.

Cumulative Impacts

SCAQMD's methodological framework was used to assess the proposed project's cumulative impacts. In order to assess cumulative impacts based on the AQMP's forecasts of attainment of ambient air quality standards set forth in the Federal and State Clean Air Acts, this methodological framework takes into account forecasted regional growth projections from SCAG. Cumulative development can affect implementation of the AQMP. The 2012 AQMP was prepared to accommodate growth, to reduce pollutants within the SCAQMD portion of the SCAB, and to minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP

would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the SCAB is within the projections for growth identified by SCAG, implementation of the 2012 AQMP would not be obstructed by such growth and cumulative impacts would be less than significant.

Since the proposed project would not induce substantial population growth and would be consistent with the growth projections anticipated by SCAG (as further discussed in the Population and Housing section of the previously prepared Initial Study [Appendix III]), the proposed project would be expected to result in a less than significant cumulative air quality impact in relation to consistency with the AQMP.

However, it was determined that there are 11 projects that could affect the cumulative impact analysis of the proposed project that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a nonattainment area. As discussed above, emissions during construction of the proposed project as analyzed in this Draft EIR would be reduced to below the level of significance with the implementation of mitigation measures MM-1 through MM-7. Therefore, implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

4. Mitigation Measures

Air-1: During the construction phase of the project, the oject applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4: The project applicant shall establish incentives for increased transit frequency in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

5. References

DEIR, at pp. IV.B-1 – IV.B-24; DEIR, Appendix V; FEIR, Response to Comment Nos. E2, E6, E7, E10, E11, E13, E14, E21, E39, E43, E44, E46, E52, E54, E58, E62, E67, E68, E71, E72, E79, E81.

B. Cultural Resources

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on paleontological and archaeological resources during construction.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on paleontological and archaeological resources to a less than significant level.

3. Rationale

Paleontological Resources

The Vertebrate Paleontology section of the Natural History Museum of Los Angeles County performed a paleontological collections records search to locate fossil localities within and in the immediate vicinity of the proposed project site. No fossils localities have been reported within the boundaries of the project site.22 However, museum records indicated that at least six fossils localities (LACM [Los Angeles County Museum] 1755, LACM 3363, LACM 6204, LACM 7701, LACM 7702, and LACM 7758) yielding vertebrate specimens that have scientific importance have been documented in the vicinity.

The paleontological record search indicated that there were no new paleontological resources and/or unique geological features located within the project area. LACM characterization of the project area suggest that surface grading or shallow excavations in the younger Quaternary deposits typically do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils. Therefore, grading and excavations at depths greater than 5 feet may expose and/or damage potentially significant fossils.

The proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource. The geology of the proposed project site is composed of surficial deposits of younger Quaternary Alluvium underlain by older Quaternary Alluvium. The older Quaternary Alluvium deposits have moderate sensitivity for paleontological resources and, therefore, have the potential to reveal important vertebrate fossils that can contribute to the life history of the area. Excavations (at 5 feet or more) may encounter previously undisturbed native soils and may have the potential to encounter paleontological resources within these older deposits. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or

indirectly to the destruction of a unique paleontological resource (at depths greater than 5 feet), thus requiring the consideration of mitigation measures.

There are no unique geological features currently identified within the proposed project boundary; therefore, there would be no expected impacts to cultural resources related to the destruction of a unique geologic feature.

Archaeological Resources

The SCCIC conducted a records search for the project site and adjacent surrounding properties and CRHR/NRHP listed and eligible for listing historic properties.24 Native American coordination was also conducted through the NAHC in 2007 and 2013, which consisted of a Native American Sacred Lands Search to identify Native American burials and/or Native American cultural resources within the proposed project site. No California Historical Landmarks (CHLs) are involved with the project, nor does the proposed project site include any California Points of Historical Interest.

The results of the SCCIC record search indicated that 25 cultural resources studies have been conducted with a 0.5-mile radius of the proposed project (Appendix VI, Addendum to the Cultural Resources Technical Report). Of these, 5 previous studies occurred within the proposed project, and 20 studies are adjacent to the proposed project area. A total of 45 cultural resources have been previously recorded within a 0.5-mile radius of the proposed project area. Five resources (P-19-003069, P-19-003070, P-19- 003889, P-19-186110, and P-19-187085/Mojave Road) have been documented within the project area (Table IV.C-1, Prehistoric and Historic Archaeological Sites Located within the Project Area). One resource, P-19-187085/Mojave Road, has portions that have been found to be eligible or eligible for listing on the CRHR and/or NRHP. Another resource located adjacent to the proposed project, P-19- 186110/Hobart Station, has been found to be eligible for listing on the CRHR and/or NRHP. Additional analyses of historic maps found that the proposed project area contained historic structures as late as 1928, although none remains today.

In 2007 and 2013, the NAHC was contacted to perform a search of the Sacred Lands Field (SLF) of the project area. The SLF resulted in negative findings for Native American cultural resources within the proposed project area.26 In 2007, SWCA Environmental Consultants conducted a Phase I Pedestrian Survey, which resulted in the discovery of one multicomponent archaeological site consisting of both historic and prehistoric materials. The site was given the designation P-19-003889 by the SCCIC and was formally recorded on State of California Department of Parks and Recreation (DPR) 523 series forms. The field survey recovered a total of 15 diagnostic and/or noteworthy artifacts located at 12 different locations on the surface of the project. Of these, 11 artifacts were classified as historic, 1 as prehistoric, 1 as modern, and 2 as pestles of undetermined age.

The record search results indicate the presence of previously recorded buried archaeological features (below 1 meter) adjacent to the project area (ex. privy). Phase II testing conducted in the project area in 2007, within the project area, represents a limited sample; therefore, archaeological materials and/or features could be present. Therefore, there remains a possibility that buried archaeological materials or intact features from P-19-003889 could be present.

The proposed project has the potential to result in significant impacts to cultural resources related to a substantial adverse change in the significance of prehistoric or historic archeological resources. Previous subsurface testing within the project area and adjacent to the project identified the presence of historic period archaeological materials and features. Although the findings within the project area were not considered eligible or unique archaeological resources, the testing only sampled the project area; therefore, the potential remains for previously undiscovered buried archaeological resources to be present within the project area. As a result, the proposed project has the potential to result in significant impacts to cultural resources related directly or indirectly to the destruction of a unique archaeological resource below the surface, therefore requiring the consideration of mitigation measures.

Historical Resources

There are no identified historical resources present within the proposed project. One resource, P-19- 187085/Mojave Road, has been noted to pass through the proposed project; however, no evidence of the road currently exists. SWCA Environmental Consultants conducted a Phase II Testing program of P-19- 003889. The testing program involved the placement of 10 shovel test pits (STPs) in a grid pattern throughout the project area to depths ranging from 20 to 90 centimeters below the surface. Nine of the 10 STPs contained cultural materials, which consisted entirely of historic period artifacts. No prehistoric artifacts were observed within the 10 STPs. The historic materials recovered at P-19-003889 did not identify any intact subsurface cultural deposits or features; therefore, the site is not recommended eligible for listing under any criteria for the CRHR (CEQA Section 15064.5(a)(3)(A-D)) and as such is not considered significant under CEQA. Therefore, the proposed project would have less than significant effects with respect to historical resources.

Human Remains

Reviews of historic maps, along with the results of the records search with the NAHC, indicate that there are no known Native American or historic period cemeteries, nor known informal Native American burials, within the proposed project site. The NAHC was requested to conduct an updated search from their Sacred Lands File for the presence of Native American sacred sites or human remains within the project study area. A written response was received by Sapphos Environmental, Inc. on December 30, 2013,27 indicating that the SLF failed to identify the presence of Native American sacred lands or traditional cultural properties within the project area.

The proposed project is not expected to directly or indirectly disturb human remains, including those interred outside of formal cemeteries. There are no formal cemeteries on the property. The results of the archaeological record search, review of historic maps, and the NAHC SLF search,28 indicate that no historic period or Native American burial grounds are located within the proposed project site. Although there are no known burial sites within the proposed project site, the discovery of human remains is always a possibility. Should human remains be encountered as a result of project related activities, the project will be subject to Section 7050.5 of the Health and Safety Code. In this event, the Los Angeles County Coroner will be notified within 24 hours of the discovery of human remains, excavation in the area of the remains will be halted, the Coroner will determine the nature of the human remains as archaeological

or modern, and if the human remains are identified as prehistoric Native American, the Coroner will contact the NAHC and provide notification of the discovery of Native American human remains. Therefore, the proposed project would not result in impacts to cultural resources relating to the disturbance of human remains, including those interred outside of formal cemeteries.

Cumulative Impacts

The incremental impact of the proposed project on paleontological resources, archaeological resources, historical resources, and human remains would be less than significant. There are no expected impacts to paleontological resources, as mitigation measures are required to reduce impacts to the older Quaternary Alluvium deposits present at the proposed project site to below the level of significance. There are no unique geological features on the proposed project site; therefore, there would be no expected impacts related to the destruction of a unique geologic feature. The potential to yield archaeological resources exists on the proposed project site, which constitutes a significant impact requiring the consideration of mitigation measures. There are no known burial sites within the proposed project site; therefore, there would be no expected impacts related to the disturbance of human remains.

4. Mitigation Measures

Cultural-1: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed Project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- Paleontological Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data. All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Cultural-2: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

- A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

- Cultural Resources Sensitivity Training shall be required for all Project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of archaeological material, sketches of recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

5. References

DEIR, at pp. IV.C-1 – IV.C-15; DEIR, Appendix III/Appendix IS-2 and Appendix IS-3; DEIR, Appendix VI.

C. Greenhouse Gas Emissions

1. Potential Impact

The Project will have a less than significant effect on greenhouse gas emissions.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project's global climate change impacts were analyzed quantitatively considering the construction and operational scenario, size, and location of the proposed project. To quantify the amount of GHG emissions contributed by construction and operation of the proposed project, the CalEEMod emissions model and the California Climate Action Registry's General Reporting Protocol were used. The proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project conflicts with the goal of reducing California's GHG emissions to the 1990 levels (427 million metric tons CO2e, which is equivalent to approximately 10 tons CO2e per capita) by 2020 as required by AB 32. Additionally, based on the suggested thresholds proposed by the CAPCOA, the proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project emits more than 25,000 metric tons of CO2e per year.

Based on emissions modeling, unmitigated construction activities would result in the emission of a maximum of approximately 643.22 metric tons of CO_{2e} (Table IV.D-3, Unmitigated CO_2 and CO_{2e} Emissions). Operation of the proposed project would result in the emission of approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 365,945 square feet of warehouse space. The proposed project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO_{2e} per year, thus not requiring the consideration of mitigation measures.

As a central component of the CEQA Guidelines, there is substantial evidence to support compliance with the Los Angeles Green Building Code (LAGBC) is qualitatively consistent with applicable statewide, regional, and local goals and policies in place for the reduction of GHG emissions. In order to implement the City's Green LA goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC applicable to new development projects. As it relates to new development, the City adopted the LAGBC Ordinance No. 181480, which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City. The proposed project is defined as a "newly constructed nonresidential" pursuant to the LAGBC. The following is a list of mandatory measures within the LAGBC that would have the effect of reducing the project's direct GHG emissions:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent. • 99.05.210.1. ENERGY STATE Equipment and Appliances. Residential grade equipment and appliances provided and installed shall by ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.

- 99.05.211.4. Prewiring for Future Electrical Solar System: Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.

- 99.05.303.2 Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.

- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

Through implementation of mandatory measures outlined in the LAGBC, the proposed project would be consistent with AB 32, the SCAG RCP, the City of Los Angeles General Plan, and the Los Angeles Climate Action Plan. Therefore, the proposed project would have a less than significant impact on GHG emissions in relation to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.

Cumulative Impacts

It was determined that there are 11 projects that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site (Figure II.B-1, Related Projects, Table III.B-1, Related Projects), but for the purposes of GHG emissions, there are many more projects in the County, the State, and worldwide that would contribute to cumulative global GHG emissions. Due to the fact that the proposed project would be implementing mandatory measures outlined in the LAGBC for "newly constructed nonresidential," the proposed project would be consistent with all applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Additionally, all of the related projects are consistent with the LAGBC guidelines and therefore do not constitute a significant impact on GHG, as they are achieving per capita reductions laid out in the Citywide plan. Furthermore, the proposed project is relocating current operations to a centralized location along the Alameda Corridor with immediate access to rail lines and major interstates and highways, which greatly

minimizes mobile emissions that are typical for a project of this type. Therefore, the sizeable percentage of operational GHG emissions associated with the proposed project should not necessarily be considered new emissions attributable to the proposed project because the future employees of the project already generate emissions through their current operations. Thus, when analyzed in conjunction with related past, present, and reasonably foreseeable future projects, the proposed project's cumulative impact in relation to GHG emissions and global climate change is less than significant.

4. Mitigation Measures

As discussed above, the proposed project's construction and operational emissions are not expected to exceed the recommended CARB threshold of 25,000 metric tons of CO2e per year. Additionally, with the incorporation of mandatory measures outlined in the LAGBC, the impacts related to GHG emissions would be less than significant, not requiring the consideration of mitigation measures.

5. Level of Significance After Mitigation

There are no significant impacts in regard to greenhouse gas emissions that would require the implementation of mitigation measures.

6. References

DEIR, at pp. IV.D-1 – IV.D-13; DEIR, Appendix IV; FEIR Response to Comment Nos. E7, E46, E62, E67.

D. Hazards and Hazardous Materials

1. Potential Impact

The Project will have a less than significant effect on hazards and hazardous materials.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

The proposed project site is currently vacant, and there is currently no transport, use or disposal of hazardous materials related to the property. The historic uses of the proposed project site that may have involved the transport, use, or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products The proposed project site is currently vacant and there is no expected potential for the release of hazardous materials. The historic uses of the proposed project site that may have involved the transport, use or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products manufacturing. The results of several surface and

subsurface investigations conducted at the proposed project site indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) were generally below regulatory limits for commercial land use. Elevated concentrations of certain metals (primarily lead and arsenic) were detected in a limited number of samples, but in no discernible pattern. Based on the analytical results, the available data do not indicate any significant release of contamination to the Property.

An HHSE was performed for the subject property (Appendix VIII). The HHSE was performed to evaluate whether constituents of potential concern (COPCs) were present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future industrial land uses.

Several Phase I and Phase II environmental site investigations have been performed on the subject site from 1995 to 2013. Reports of these investigations were reviewed to develop a conceptual site model, to identify COPCs, and to identify appropriate exposure point concentration estimates for the health screening evaluation. The reports reviewed included:

- Phase I Environmental Site Assessment, June 2013. Prepared by SCS Engineers.
- Soil Vapor Survey, March 2011. Prepared by SCS Engineers.
- Preliminary Risk Assessment, 31 May 2007. Prepared by PSI.
- Hexavalent Chromium Analysis, 3 November 2006. Prepared by PSI.
- Site Investigation Report – Lancer Site, 29 October 2003. Prepared by Pacific Edge Engineering, Inc.
- Phase II and Limited Phase III Environmental Site Assessment, 9 October 2006. Prepared by PSI.
- Phase I Environmental Site Assessment, 1 September 2006. Prepared by Professional Service Industries, Inc. (PSI).
- Phase I/II Environmental Site Assessment, 25 May 2006. Prepared by Advantage Environmental Consultants, LLC.
- Preliminary Health Risk Evaluation – Lancer Site, 18 January 1995. Prepared by Hart Crowser, Inc.

Collectively, these reports provide a representative summary of environmental conditions on the subject site.

Based on the HHSE, understanding the regulatory points of departure for risk management, a cumulative cancer risk of 1×10^{-6} indicates that there may be one additional case of cancer for every 1,000,000 people in a population exposed to the COPCs and under the exposure conditions identified in the human health screening evaluation. To put this cancer risk in perspective, the background rate of cancer in the United States is about 1 in 3.16 Therefore, of the roughly 300,000,000 citizens of the United States, 100,000,000 can expect to develop some form of cancer at some time in their lives. If the entire population of the United States were to reside on a site where, due to chemical contamination, the excess lifetime cancer risk was 1×10^{-6}, then an additional 300 individuals might develop some form of cancer as a result, and the total number of cancer cases would be 100,000,300. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with

limited small lot single-family residential homes intermixed with light industrial warehouse uses to the south and industrial uses and residential areas to the west across Long Beach Avenue. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area. The Alameda Corridor also includes the Union Pacific Railroad right-of-way across South Alameda Street. Directly west of the proposed project is the Metro commuter light rail line, which separates the industrial zone of the project area with small lot single-family homes interspersed with various commercial and light industrial uses west of Long Beach Avenue. Other uses in the project area include churches, schools, and a park. The largely industrial character of the surrounding area is a source of frequent truck and heavy-duty transport activity. Given the industrial nature of much of the surrounding area, the presence of hazardous materials is likely on some of the adjoining sites. However, no recognized environmental conditions were observed.

Cumulative Impacts

The proposed project does not create hazards or generate hazardous wastes. It was determined that there are three projects occurring within the vicinity of the proposed project site that are anticipated to be implemented within the construction period of the proposed project (Table II.B-2, Related Projects). The proposed project does not generate hazards or hazardous wastes. The related projects do not have the potential to generate hazards and hazardous wastes. The related projects are far enough away or do not generate COPCs that would have the potential to contribute to cumulative impacts that would pose a risk or hazard to people or property when evaluated with the related projects.

Because the proposed project does not generate hazards or hazardous wastes, it will not contribute to significant cumulative impacts when added to related past, present, or reasonably foreseeable, probable future projects.

4. Mitigation Measures

None required

5. Level of Significance after Mitigation

There are no significant impacts requiring the consideration of mitigation measures. For seven of the eight thresholds related to hazards and hazardous materials, there are no impacts. With respect to the four CPOCs, there are no anticipated significant impacts, and no mitigation is required. There are no significant and unavoidable impacts related to hazards or hazardous materials.

6. References

DEIR, at pp. IV.E-1 – IV.E-11; DEIR, Appendices VII and VIII; FEIR, Appendices D through N; FEIR, Response to Comment Nos. B2, E7, E10, E11, E46, and E48.

E. Land Use and Planning

1. Potential Impact

The Project will have a less than significant effect on land use planning.

2. Finding

CEQA does not require the imposition of mitigation measures where impacts will be less than significant.

3. Rationale

As documented in the Initial Study, the proposed project would not result in significant impacts in relation to land use and planning through the physical division of an established community. The proposed project site is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance and is located in an area developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor is located directly to the east of the proposed project site and runs below-grade in the project area. All proposed development associated with the proposed project would occur within the boundaries of the proposed project site as it currently exists and would not require an alteration of the existing transportation infrastructure. Additionally, the proposed project would not result in the closure of any existing pedestrian routes. The proposed project is located in a manner that is compatible with the existing community and would not cause a physical division within the established community. Therefore, the proposed project would not result in direct, indirect, or cumulative significant impacts to land use and planning in regard to physical division of an established community, and no mitigation measures are required.

The proposed project would not be expected to result in significant impacts to land use and planning in relation to a conflict with adopted or proposed land use plans, policies, or regulations. However, the City of Los Angeles Department of Public Works Bureau of Sanitation has requested that the design of the proposed project be refined to comply with the City of Los Angeles Green Streets Policy, which is still being developed to incorporate green street BMPs into City approved construction details. During the NOP scoping period, the City of Los Angeles Department of Public Works Bureau of Sanitation requested a revision to the proposed project's street plans to meet the City's Green Streets Policy requirements.

As currently proposed, the proposed project consists of four buildings with approximately 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space with associated on-site surface parking. The proposed project meets the Southeast Los Angeles Community Plan's minimum requirements for a landscaping buffer and will incorporate the City of Los Angeles' proposed Green Streets policy BMPs in the landscape planters or adjacent sidewalk. The proposed project is located in an area that is almost exclusively developed with light and heavy industrial uses. Additionally, the proposed project is designated as a "Light Industrial Zone" pursuant to the Los Angeles Zoning Ordinance, which allows for lower-impact industrial uses such as clothing and manufacturing,

furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales.

Furthermore, the Southeast Los Angeles Community Plan states that industrial land uses within the Community should be preserved and/or redeveloped to accommodate emerging technologies, thus providing an enhanced job base for the Community's population. Due to the nature of the proposed project, the proposed project would be compliant with the Los Angeles Zoning Ordinance, and consistent with the Southeast Los Angeles Community Plan. Moreover, by developing the proposed project along the Alameda Corridor, the proposed project would be consistent with the RTP and RCP by placing an industrial/warehouse land use along the 20-mile-long rail cargo expressway linking the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles.26, 27 Therefore, the proposed project would not result in significant impacts to land use and planning, and no mitigation measures are required.

As documented in the Initial Study, the proposed project would not result in impacts to land use and planning in relation to a conflict with any applicable habitat conservation plan or natural community conservation plan. The proposed project site is not located within an NCCP designated or proposed for designation by CDFW. Additionally, the proposed project site is not located within an HCP designated, or proposed for designation, by USFWS. Therefore, there are no impacts to land use and planning related to a conflict with any adopted habitat conservation plan or natural community conservation plan, and no mitigation measures are required.

Cumulative Impacts

The incremental impacts of the proposed project to land use and planning, when added to the related past, present, or reasonably foreseeable, probable future projects listed in Table II.B-1, Related Projects, would not be expected to be significant. The vacant project site is designated as Light Industrial according to the Southeast Los Angeles Community Plan of the City's General Plan and designated as "M2-2" Light Industrial Zone according to the City of Los Angeles Zoning Ordinance and therefore meets the City's planning objectives within the Alameda Corridor. Therefore, the proposed project would not result in cumulative impacts to land use and planning, and no mitigation measures are required.

4. Mitigation Measures

None required.

5. References

DEIR, at pp. IV.F-1 – IV.F-10; FEIR, Response to Comment Nos. E7, E36, E46, E52, E54, E63, E67, E71, E80.

F. Utilities and Service Systems

1. Potential Impact

As indicated in the FEIR, the proposed Project could have a significant effect on the capacity of the City's sewer system.

2. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate the potentially significant effect on the capacity of the City's sewer system to a less than significant level.

3. Rationale

As a result of letters of comment received by the City of Los Angeles (City) during the scoping period, the City determined that the proposed 4051 South Alameda Street Project (proposed project) may have the potential to result in significant impacts related to utilities and service systems. Therefore, this issue has been carried forward for detailed analysis in this Draft EIR. This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to utilities and service systems as a result of the proposed project.

The potential for the proposed project to result in significant impacts to utilities and service systems at the proposed project site was evaluated with regard to the jurisdictions and public services provided by the Los Angeles Regional Water Quality Control Board (RWQCB), City of Los Angeles Department of Water and Power (LADWP), Los Angeles Bureau of Sanitation, California Senate Bills (SBs) 610 and 221, California Integrated Waste Management Act, and California Solid Waste Reuse and Recycling Act, based on a construction scenario provided by the construction contractor, a site plan provided by the proposed project applicant, and engineering calculations provided by Gilbert Engineering (Appendix X).

Impact Analysis

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to utilities and service systems.

(a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

The proposed project would result in less than significant impacts to utilities and service systems in relation to exceeding wastewater treatment requirements of the Los Angeles RWQCB. As discussed above, the wastewater from the proposed project would be serviced by HTP, which is located approximately 12 miles to the west of the proposed project site at 12000 Vista Del Mar, Los Angeles, California 90293. HTP has a design capacity of 450 mgd and currently treats an average of 362 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater 5 miles offshore. The remaining capacity of HTP is, therefore, approximately 88 mgd or 19.5 percent of

its total capacity. Most of the effluent from HTP is discharged into the Santa Monica Bay through a 5-mile ocean outfall, while approximately 50 mgd of secondary effluent is recycled on-site or transported to the West Basin Municipal Water District Water Recycling Plant for use by local industries.

Considering that more than 75 percent of the proposed project is dedicated to warehouse space (approximately 365,945 square feet) with 17 percent (approximately 85,181 square feet) dedicated to office space and only 8 percent (approximately 29,896 square feet) being dedicated to manufacturing space, the proposed project site would not generate sewer flows that would contain constituents that would jeopardize the ability of HTP to operate within its established wastewater requirements. As with all wastewater treated by HTP, wastewater from the proposed project would be treated according to the treatment requirements enforced by the NPDES permit authorized by the Los Angeles RWQCB. Therefore, the proposed project would not result in significant impacts to utilities and service systems and no further analysis related to exceeding wastewater treatment requirements is warranted.

(b) Would the project require or result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?

The proposed project would not result in impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges. Based on the estimated flows, the Bureau of Sanitation has determined that the sewer system may be adequate. However, additional analysis has indicated that the estimated flow will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 201614 (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and final approval for sewer capacity and connection permit will be made at that time.

Wastewater from Building #1 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under Martin Luther King Jr. Blvd from the north with an expected flow of 53,760 gallons per day (GPD), which is far less than the 198,599 GPD gauged capacity by the City. Also, there are two existing laterals at the 10-inch sewer under Long Beach Avenue, with an expected flow of 25,440 GPD which is far less than the 394,453 GPD gauged capacity by the City. Wastewater from Building #2 would enter the sewer infrastructure from two existing

laterals at the 8-inch sewer under East 41st Street, with an expected flow of 20,160 GPD, which is far less than the 294,000 to 427,000 GPD gauged capacity by the City. Wastewater from Building #3 would enter the sewer infrastructure from two new laterals under Martin Luther King Jr. Blvd, with an expected flow of 32,640 gallons per day, Wastewater from Building #4 would enter the sewer infrastructure from two new laterals under East 41st Street.

The proposed project area will be serviced by HTP, which has a design capacity of 450 mgd and treats an average of 362 mgd. Furthermore, in November 2006, the Los Angeles City Council approved the Integrated Resources Plan (IRP), which accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP addresses increases in wastewater flows through improvements, additions, and expansions within the HTP service area. These improvements would increase the capacity of the HTP service area to 570 mgd, consisting of HTP's capacity of 450 mgd, TWRP's new capacity of 100 mgd, and LAGWRP's capacity of 20 mgd.14 As of today, all projects have been completed within treatment plants and sewer lines, and additional ongoing improvements have been proposed in order to continually provide services to meet wastewater needs for the City. Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects, and no further analysis is warranted.

(c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

The proposed project would result in less than significant impacts to utilities and service systems in relation to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts. As currently proposed, the proposed project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the proposed project would construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. However, the proposed project site would continue to drain into existing City storm drain infrastructure, and runoff from the proposed project site is estimated to be 1.03 cubic feet per second (cfs) and is not expected to exceed the capacity to existing or planned stormwater drainage systems.

Therefore, the proposed project would not result in significant impacts to utilities and service systems, and no further analysis related to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts, is warranted.

(d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

As documented in the Initial Study (Appendix III), there are no impacts from water supplies to accommodate the project's existing entitlements and resources needs. No further analysis is warranted.

(e) Would the project 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 conditions?

As documented in the Initial Study, there are no impacts with wastewater treatment provider's capacity to accommodate the project's demand, and no further analysis is warranted.

(f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

As documented in the Initial Study, there are no impacts with landfill capacity to accommodate the project's solid waste disposal needs, and no further analysis is warranted.

(g) Would the project comply with Federal, State, and Local statutes and regulations related to solid waste?

As documented in the Initial Study, there are no impacts with the project's complying with Federal, State, and Local statues and regulations related to solid waste, and no further analysis is warranted.

4. Mitigation Measures

Utilities-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

5. References

DEIR, at pp. IV.H-1 – IV.H-10; FEIR, at pp. IV-18-IV-20; FEIR, Appendix P; FEIR, Response to Comment Nos. B3, D1, D2, and E46.

6. Level of Significance After Mitigation

Implementation of the proposed project has the potential to result in significant impacts to Utilities and Service Systems. For four of the seven thresholds related to utilities, the analysis contained in the Initial Study determined that there are no impacts. This Draft EIR analysis addressed comments related to demand and capacity related to sewer and storm water for the proposed project site and provides substantial evidence that there are less than significant impacts. However, the City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections, as a means of avoiding impacts to the public sewer system. Implementation of mitigation measure Utilities and Service Systems-1 would avoid

impacts to the public sewers, and ensure that impacts during operation of the proposed project are reduced to below the level of significance.

VII. Effects that will Remain Significant Despite Imposition of all Feasible Mitigation Measures

The City finds that the following environmental impacts identified in the FEIR are potentially significant. Mitigation has been identified that will reduce the impact to the extent feasible; however, there is no feasible mitigation that will completely eliminate that significant impact. The potentially significant impacts and the mitigation measures which will reduce them to the extent feasible are set out in the FEIR and are summarized as follows:

A. Transportation / Traffic

1. Potential Impacts

The proposed Project would result in significant impacts to transportation and circulation at the intersection of Alameda Street/Washington Boulevard.

2. Finding

Pursuant to CEQA section 21081(a)(1), changes or alterations have been required in, or incorporated into, the Project which mitigate this effect to the extent feasible. Specific economic, legal, social, technological or other considerations, including considerations for the provision of employment opportunities, make infeasible any other mitigation measures or alternatives identified in the FEIR. As explained in Section IV, below, specific overriding economic, legal, social, technological, and other benefits of the Project outweigh this significant effect on the environment.

3. Rationale

In order to assess future operating conditions both with and without the proposed project, existing traffic conditions within the proposed project study area were evaluated. The proposed project site is located approximately one mile to the south of Interstate 10 and approximately 2.15 miles to the east of State Highway 110. Major east-west regional access to the proposed project site is provided by Vernon Avenue, while the major north-south regional access is provided by Alameda Street and Long Beach Avenue. The proposed project would provide four full-access driveways on 41st Street and four full access driveways on Martin Luther King Jr. Boulevard. Table IV.G-1 of the Draft EIR, Access Driveway Conditions, provides a brief description of the existing roadways that comprise the circulation network of the proposed project study area, providing the majority of both regional and local access to the proposed project site.

For the purpose of evaluating existing operating conditions as well as future operating conditions with and without the proposed project, the study area was carefully selected in accordance with local traffic study guidelines. Manual turning movement counts for the selected intersection were collected in the field for the morning and evening peak periods during the month of September 2012. As requested in letters of comment received by the City from Caltrans in response to the scoping notice for the EIR, traffic

counts at critical locations were updated in September 2014. The intersections were counted during the peak hours of 7:00 to 10:00 a.m. and 3:00 to 6:00 p.m. It was determined that nine key intersections would be analyzed for the project study area (Figure IV.G-2, Existing Lane Configurations at Key Intersections):

- Alameda Street and 41st Street
- Alameda Street and Vernon Street
- Alameda Street and 24th Street
- Alameda Street and Washington Boulevard
- Long Beach Avenue and 41st Street
- Long Beach Avenue and Vernon Street
- Long Beach Avenue and 24th Street
- I-10 Freeway Eastbound Off-ramp and Alameda Street
- I-10 Freeway Westbound Off-ramp and Alameda Street

Existing traffic conditions for 2014 were evaluated using the Critical Movement Analysis method (also known as Transportation Research Board's Circular 212 Planning Analysis Method). All the study intersections are currently operating at a Level of Service (LOS) D or better (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. and p.m. peak hours.

As a response to comments provided by Caltrans during the scoping period for the EIR, the intersections of the I-10 Eastbound and Westbound off-ramps at Alameda Street were included in the analysis. A freeway segment analysis requirement was assessed using Caltrans procedures to determine if freeway segment impact analysis is required for the project. The number of lanes on the I-10 Freeway is five per direction on the east as well as west of Alameda Street. The capacity of a freeway lane is 2,000 vehicles per hour; therefore, the capacity of these freeway segments is 10,000 vehicles per hour for each direction. The existing I-10 Freeway segments in the study area are operating at LOS F. The criteria for impact analysis of a freeway segment are defined as increase in trips by project by 1 percent or more of capacity (i.e., 100 trips) at LOS E or F. As shown in the table, the project will add a maximum of 29 trips to I-10 Freeway traffic volume, less than 100 trips during the peak hours. Therefore, the freeway segment impact analysis per Caltrans methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway segments.

A freeway off-ramp analysis requirement was assessed using Caltrans procedures to determine if freeway off-ramp impact analysis is required for the project. The number of lanes on the I-10 Freeway Eastbound and Westbound Off-Ramp at Alameda Street is two and three, respectively. The capacity of a freeway off-ramp lane is 1,500 vehicles per hour; therefore, the capacity of these freeway off-ramps is 3,000 and 4,500 vehicles per hour, respectively. The criteria for impact analysis of a freeway off-ramp are defined as increase in peak hour trips by project by 1 percent or more of off-ramp capacity at LOS E or F, and 2 percent or more of capacity at LOS D. The existing I-10 Freeway off-ramps at Alameda Street are operating at LOS C or better. The impact thresholds are 60 trips at 2 percent of ramp capacity. The project will add 41 total trips to the off-ramps of I-10 Freeway at Alameda Street during the a.m. peak hour, and this off-ramp volume from the project does not exceed the criteria for off-ramp analysis. Therefore, the freeway off-ramp impact analysis per Caltrans

methodology is not required. In other words, the project traffic would not have a significant impact on the I-10 Freeway off-ramps in the study area.

The proposed project was originally analyzed by the City of Los Angeles Department of Transportation (LADOT) in November 2012. The original analysis was based on the construction of a warehouse facility with four units, each providing 120,000 square feet of gross floor area for a total of 480,000 square feet gross floor area including ancillary office spaces.13 In January 2013, the proposed project was modified to include approximately 17,219 square feet, and the traffic analysis was reviewed by the traffic engineer and updated. The LADOT analysis indicated that there would be no change in the future 2014 LOS of the study intersections as a result of the project. The proposed project was analyzed again by LADOT in October 2013 to address inclusion of 29,896 gross square feet of manufacturing use.

In response to comments received during the scoping period for the EIR, new traffic counts were performed at three of the critical intersections out of the seven original intersections to provide updated data to characterize 2014 baseline conditions and projected further 2016 baseline conditions (Appendix IX). The three critical intersections were selected for updated counts because of their proximity to the project location. For the remaining intersections, counts were updated by using 1 percent traffic growth rate between 2012 and 2014 per Los Angeles County CMP projections for this area.

Freeway Facilities Analysis

The LADOT entered into an agreement with Caltrans District 7 in October 2013 that requires a focused freeway impact analysis per Caltrans traffic impact studies procedures for all projects that began after October 2013.16 As part of the agreement, the City requires project applicants to work with Caltrans in preparing a freeway impact analysis for land use proposals that meet any of the following criteria:

- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F, based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane). Project impacts are identified for the future year 2016 conditions.

At those intersections operating deficiently (e.g., at a level worse than LOS D) and significantly impacted by the proposed project, a mitigation measure is identified and applied, and a before-and-after mitigation analysis conducted.

Impact Analysis

(a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located within the City of Los Angeles and is therefore subject to the California Transportation Plan (CTP), the Regional Transportation Plan (RTP), the City of Los Angeles General Plan, and the Southeast Los Angeles Community Plan. In order to accurately assess future traffic conditions with the proposed project and potential impacts to the applicable plans related to transportation, trip generation estimates were developed for the proposed project. Trip generation rates for the proposed project are based on the nationally recognized recommendations of the Institute of Transportation Engineers (ITE). ITE also provides information on percentage of truck traffic associated with this type of land use. Approximately 20 percent of all vehicular trips generated by a warehouse are designated as truck trips to allow evaluation of a reasonable worst-case scenario. A truck trip is generally equivalent to two (2) passenger car trips on average. Therefore, a 2.0 factor was applied to the number of truck trips to estimate passenger care equivalent (PCE) trips generated by the trucks.

It is calculated that the proposed project will generate approximately 1,966 net PCE trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).

While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).

The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, Proposed Project Traffic Conditions for 2016. The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic.

However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

In addition, the construction contractor has entered into a local hire agreement for the construction phase of the proposed project (see Section III, Project Description). According to the local hiring terms, an assertive effort will be made such that 20 percent of all hours worked during construction at the proposed project site will be performed by local residents, and 10 percent will be performed by at-risk individuals. It is anticipated that the local hire agreement will reduce the proposed project's impacts to transportation/traffic by enabling employees to commute via public transit, carpooling, bike riding, and walking. Furthermore, the proposed project site is located along the 20-mile Alameda Corridor that links the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles. Through the implementation of the local hire agreement and the location of the proposed project along the Alameda Corridor, the proposed project would be consistent with the CTP, RTP, policies and goals outlined in the City's General Plan, and the Southeast Los Angeles Community Plan, particularly by reducing vehicle miles traveled (VMT) for employees, preserving the Alameda Corridor, promoting transit-oriented development growth, and reducing GHG emissions through public transit and alternative modes of transportation. The proposed project is also adjacent to the Blue Line and other transit facilities which would further reduce employee VMT.

To further ensure consistency with applicable plans, the proposed project is incorporating all recommendations provided by the LADOT for the proposed project as project elements.

Therefore, the results of the traffic analysis in conjunction with the local hire agreement and LADOT recommendations demonstrate that the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to creating a substantial increase in traffic is warranted.

(b) Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures; or other standards established by the county congestion management agency for designated roads or highways? Exceed, either individually or cumulatively, a level of service (LOS) standard established by the county congestion management agency for designated roads or highways?

The proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with an applicable congestion management program (CMP). As was presented in question (a), the proposed project's impact on future traffic conditions would not exceed a LOS D standard or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. Additionally, through the implementation of the local hire agreement, the proposed project would reduce congestion impacts by enabling employees to utilize for other modes of transportation including public transit, carpooling, bike riding, and walking. Therefore, the proposed project would result in less than significant impacts to transportation/traffic, and no further analysis related to conflicting with an applicable CMP.

(c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Initial Study prepared for the proposed project determined that the proposed project would not result in impacts to transportation/traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

(d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would not result in impacts to transportation/traffic in relation to substantially increasing hazards due to a design feature or incompatible uses. In addition to the four buildings, the proposed project includes four full-access driveways on 41 Street and four full-access driveways on Martin Luther King, Jr. Boulevard (see FigureIV.G-1) along with eight loading docks (two per building).

The proposed project would not include any dangerous design features, including sharp or blind curves, dangerous intersections, or any hazardous or incompatible uses. Additionally, the project is not proposing any modifications or crossings of the railroad ROW. There are two at-grade rail crossings in the vicinity of the proposed project. The 41st Street at-grade crossing is located immediately on the west side of the project site, while the 38th Place at-grade crossing is located immediately on the east side of the project site. The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at grade crossing to travel outbound to the west during the p.m. peak hour, while a maximum of seven vehicles will use 38th Place at-grade crossing to travel inbound from the east during the a.m. and p.m. peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project. Additionally, the proposed project is proposing to widen Long Beach Avenue by 12 feet, Martin Luther King Boulevard by 5 feet, and South Alameda Street by 24.5 feet. Therefore, there would be no impacts to transportation/traffic related to substantially increasing hazards due to a design feature, and no further analysis is warranted.

(e) Would the project result in inadequate emergency access?

The proposed project would result in less than significant impacts to transportation/traffic in relation to emergency access. The proposed project area is serviced by the Newton Community Police Station located approximately one mile to the west of the proposed project site at 3400 South Central Avenue, Los Angeles, California 90011. Additionally, the nearest City of Los Angeles Fire Department (LAFD) fire station to the proposed project site is the LAFD Station No. 14 located 0.8 miles northwest at 3401 South Central Avenue. The City of Vernon Station No. 2 is located approximately 0.8 mile to the southeast at 4305

South Santa Fe Avenue, Vernon, California 90058. In addition, there are two other LAFD fire stations within the project vicinity.

Furthermore, the proposed project includes the construction of a 28-foot-wide fire lane that will dissect the proposed project site in a north-south direction to allow emergency access along East Martin Luther King Jr. Boulevard and East 41st Street. Therefore, the proposed project site has adequate emergency access for local police and firefighters. As such, the proposed project would not result in significant impacts to transportation/traffic, and no further analysis related to emergency access is warranted.

(f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Initial Study prepared for the proposed project determined that the proposed project would result in less than significant impacts to transportation/traffic in relation to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Cumulative Impacts

The updated traffic impact analysis for the proposed project indicates that the proposed project will generate approximately 1,966 net PCE trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour (Appendix IX).20 Although these estimates were developed based on approximately 351 truck trips per day from the proposed project, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR. The results indicate that all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the Volume to Capacity (V/C) ratio due to the project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

It was determined that there are 11 projects within a 2-mile radius of the proposed project site. Of these 11 projects, 5 are located in the direct trip path and near geographic proximity to the proposed project site such that these related projects could affect the cumulative impact analysis of the proposed project within the construction period (Table II.B-1, Related Projects, Figure II.B-1, Related Projects). However, as shown in Table IV.G-7 (Future 2016 Conditions Without Project, which include traffic from related projects, and Future 2016 Conditions With the Proposed Project, which include traffic from related projects as well as the proposed project), the proposed project would be expected to result in a less than significant cumulative impact in relation to traffic and transportation; and the implementation of the proposed project would not be expected to result in

cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

The updated traffic impact analysis for the proposed Project indicates that with the assumption of 351 daily truck trips for the Project based on the recommendations of the Institute of Transportation Engineers, the proposed Project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour. The level of service (LOS) and volume to capacity (V/C) ratios for the study intersections with related proposed Project traffic and under proposed Project conditions for 2016 indicate that all study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours with the exception of the intersection of Alameda Street and Washington Boulevard, which will operate at LOS E during the p.m. peak hour. Although these estimates were developed based on approximately 351 truck trips per day from the proposed Project, the Project applicant has indicated that truck trips associated with operation of the proposed Project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in the FEIR. In order to reduce potential impacts, including impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are recommended. However, even with the implementation of recommended mitigation measures, impacts at the intersection of Alameda Street and Washington Boulevard will remain significant during the p.m. peak hour.

4. Mitigation Measures

As indicated above, all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project. The proposed project's off-site traffic impact would not be considered significant at any of these intersections based on the increase in the V/C ratio due to the proposed project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

The project applicant has identified five mitigation measures to be undertaken during design, construction, and operation of the proposed project to avoid significant impacts related to traffic and circulation.

Since the proposed project's traffic impacts would not be significant at any of the off-site intersections, no off-site mitigation measures would be necessary for the development of this project.

Traffic-1: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Traffic-2: All construction related traffic shall be restricted to off-peak hours.

Traffic-3: ~~41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way.~~

This mitigation was recommended prior to the adoption of the City of Los Angeles' Mobility Element 2035, in which 41st Street was reclassified to a Collector Street. Revised recommendations received from the Bureau of Engineering have been informed by the Mobility Element 2035. Therefore, this mitigation measure has been deleted.

Traffic-4: The Project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 124 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 72 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total square feet and provides 97 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total square feet and provides 75 parking spaces.

Traffic-5: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

5. Level of Significance After Mitigation

Implementation of mitigation measures as included in the determination would reduce impacts to traffic and transportation facilities during construction and operation of the proposed project. However, significant impact would remain at the intersection of Alameda Street/Washington Boulevard in the event that new industrial park resulted in 351 daily truck trips at this location.

6. References

DEIR, at pp. IV.G-1 – IV.G-18; DEIR Appendices IX and XI; FEIR, at pp. IV-14 – IV-18; FEIR, Appendices B and C; FEIR, Response to Comment Nos. B1, B3, E2, E6, E9, E10, E11, E12, E14, E39, E43, E44, E46, E48, E68, E72, E79, E81.

VIII. Alternatives to the Original Project

To develop project alternatives, the EIR preparers considered the project objectives and the significant impacts identified in Section IV of this Draft EIR, identified those significant impacts that could be substantially avoided or reduced through an alternative, and determined the modifications to the project that would be needed to meet most of the basic

objectives of the proposed project and substantially reduce or avoid the significant impacts of the project.

Three alternatives to the Project are identified in the FEIR, which include a No Project Alternative, a Use of Clean Fuel Trucks Alternative, and a Reduced Truck Operations Alternative. Two additional land use alternatives, the Community Garden Alternative and the Park or Recreational Use Alternative, were withdrawn from consideration on the grounds that they are inconsistent with the Project objectives set forth in the FEIR and the objectives and policies of the Southeast Los Angeles Community Plan. Based on an analysis of these alternatives, an environmentally superior alternative was identified. Each of the alternatives has been evaluated in relation to its ability to accomplish the Project objectives.

The objectives of the proposed project are as follows:

- Construct a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing.
- Locate a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- Develop an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- Provide opportunities for the project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project.
- Preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- The Southeast Los Angeles Community Plan Area population stands to benefit from the proposed project due to economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City.

Based on the analysis contained in the FEIR, the Project will result in a significant and unavoidable traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour.

Because significant environmental effects would remain even after application of all feasible mitigation measures, the City must adopt findings on the feasibility of Project alternatives. If there is a feasible alternative to the Project, decision makers must decide whether it is environmentally superior to the Project.

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." State CEQA Guidelines section 15091 adds "legal" considerations as another indicia of feasibility. (See also Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 565.) Project objectives also inform the determination of "feasibility." (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 417.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Id.; see also Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 715.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (Residents Ad Hoc Stadium Com. v. Board of Trustees (1979) 89 Cal.App.3d 274, 287.)

The three identified alternatives, as well as the two alternate land use alternatives and the identified environmentally superior alternative, are summarized below.

A. Alternate Land Use Alternative – Community Garden

These alternatives, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or a park or recreational Use. However, these alternative were withdrawn from consideration for further analysis as it does not meet the basic objectives of the project:

- A community garden would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent

uses. The Southeast Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands". The Project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Because the Community Garden Alternative does not meet the Project objectives and is inconsistent with the goals and policies of the Southeast Los Angeles Community Plan, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at p. VI-3; FEIR, at pp. IV-21 – IV-22; Response to Comment Nos. E7, E62, E63, and E67.

B. **Alternate Land Use Alternatives – Park or Recreational Use**

This alternative considered development of a portion of the property for an alternate land use, specifically a park or recreational use. However, this alternative was withdrawn from consideration for further analysis, because it is inconsistent with the adopted Community Plan and does not meet the basic objectives of the Project:

- A park or recreational use would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A park or recreational use would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A park or recreational use would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A park or recreational use would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A park or recreational use would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A park or recreational use would not benefit Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." The Project site is in an industrial corridor adjacent

to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed Project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the Project area, and also includes the Union Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail line is located immediately to the west of the Project site.

Appendix XII and Section III.E of the DEIR provide details of a 2003 settlement agreement between the prior owner of the Project site and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation purposes, and subsequent amendment of the agreement to allow the proposed Project to be developed. This amendment for a cash pledge in lieu of a dedication of a portion of the Project site provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the Project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property. The cash pledge was subsequently utilized to improve recreational facilities at Ross Snyder Park, Fred Roberts Park, and the Pueblo Del Rio housing development.

Because the Community Garden Alternative does not meet the Project objectives, is inconsistent with the goals and policies of the Southeast Los Angeles Community Plan, and has been determined to be inappropriate in an industrial corridor which is isolated to the east and west by major rail lines, it is not a feasible alternative and was withdrawn from further consideration.

References: DEIR, at pp. VI-3 – VI-4; FEIR, at pp. IV-22 – IV-24; Response to Comment Nos. E7, E62, E63, and E67.

C. No Project Alternative

1. **Description of the No Project Alternative**

There are no components to the No Project Alternative. Under the No Project Alternative, the proposed Project would not be constructed. The existing conditions at the site would remain unchanged, until a future project is proposed for development consistent with the light manufacturing zoning.

2. **Objectives and Feasibility**

The No Project Alternative would not meet any of the Project objectives. Leaving the property vacant would also be inconsistent with the light manufacturing land use zoning designation for the property. More importantly, the failure to develop the property for its designated purpose as light manufacturing would be inconsistent with land use planning objectives articulated in the adopted Southeast Los Angeles Community Plan.

- **Objective 3-1**: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
  - **Policy 3-1.1**: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
  - **Policy 3-1.2**: Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.
  - **Policy 3-1.3**: Adequate compatibility should be achieved through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.
- **Objective 3-2**: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
  - **Policy 3-2.1**: The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the quality, distinctive character and compatibility with existing uses.

Under the No Project Alternative, no construction would occur. Therefore, no environmental impacts would occur. There would be no anticipated short-term, long-term, or cumulative impacts.

3. **Finding Regarding Feasibility of the No Project Alternative**

The No Project Alternative would preclude development on the property, and as a result the Project objectives that have been set forth for the Project would not be met. Thus, this Alternative was considered but, for the reasons explained above, the City finds that it is infeasible and rejects it on that basis.

References: DEIR, at pp. VI-6 – VI-9; FEIR, at pp. IV-25.

D. Use of Clean Fuel Trucks Alternative

1. **Description of the Use of Clean Fuel Trucks Alternative**

This alternative would entail the same construction scenario and level of operation as the proposed Project. The proposed Project was determined to result in significant impacts to air quality requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Truck trips during the operational phase of the Project are the primary contributor to emissions of criteria air pollutants. Therefore, under this alternative, emissions would be reduced by requiring that a mix of conventional and alternative fuel supply and distribution truck be used to decrease emissions by 10 percent.

2. **Objectives and Feasibility**

As with the proposed Project, the Use of Clean Fuel Trucks Alternative is capable of achieving the six basic objectives of the proposed Project. Additionally, the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed

project. Like the proposed Project, the Use of Clean Fuel Trucks Alternative would therefore result in significant impacts with regard to traffic and transportation at the intersection of Alameda Street/Washington Boulevard which would operate at LOS E during the p.m. peak hour. Because the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed Project, the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project.

3. **Finding Regarding Feasibility of the Use of Clean Fuel Trucks Alternative**

Because the Use of Clean Fuel Trucks Alternative would not eliminate any of the significant and unavoidable impacts resulting from the proposed Project, the City Council finds the Use of Clean Fuel Trucks Alternative to be infeasible and rejects it on that basis.

References: DEIR, at pp. VI-9 – VI-12; FEIR, at pp. IV-25.

E. Reduced Truck Operations Alternative

1. **Description of the Reduced Truck Operations Alternative**

The Reduced Truck Operations Alternative would entail the same elements that are described in the proposed Project. This alternative would entail the same construction of a new industrial park consisting of four buildings occupying approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The proposed Project was determined to result in significant traffic impacts requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the Project. Under this alternative, the Applicant has voluntarily recommended reducing maximum allowable truck trips per day, during the operational phase of the project, to 75 trips per day. The empirical data for the Applicant's existing operations demonstrates that this is feasible, as the Applicant is currently operating at less than 50 truck trips per day.

2. **Objectives and Feasibility**

As with the proposed Project, the Reduced Truck Operations Alternative is capable of achieving the six basic objectives of the proposed Project. Under the Reduced Truck Operations Alternative, the significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour would be avoided. Though the Reduced Truck Operations Alternative would have fewer impacts than the Project, there are practical difficulties associated with monitoring and enforcing a restriction on the daily number of truck trips throughout the life of the Project.

3. **Findings Regarding Feasibility of the Reduced Truck Operations Alternative**

While data demonstrates that the Applicant does not create more than 50 truck trips per day, the imposition of a condition which sets a permanent cap or limit on truck trips of the industrial park limits the potential economic growth and long term viability of the industrial-zoned site. In the event that the new structures remain the same but the nature of the industrial park's operations change or the Applicant's business expands,

there would not be an opportunity to revisit a trip cap and reassess the possibility of an adjusted limit.

In addition, an alternative that would limit truck operations presents practical difficulties with respect to long term enforcement following the construction of the industrial park. Both of the project's requested entitlements, a Parcel Map and a Site Plan Review, do not avail themselves with an inherent "plan approval" process that allows the City to revisit compliance with conditions and potentially revoke a grant if a condition is not appropriately followed in perpetuity. This challenge of ongoing monitoring is potentially further complicated in the event that the recorded parcel map is sold to four separate entities in the future.

For these reasons, the City finds the Reduced Truck Operations Alternative to be infeasible and rejects it.

References: DEIR, at pp. VI-12 – VI-15; FEIR, at pp. IV-26 – IV-27.

XI. OTHER CEQA CONSIDERATIONS

A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The EIR analyzes the potential for the project to result in growth-inducing impacts. Such impacts normally occur when a proposed project fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The types of projects normally considered to result in growth-inducing impacts are those that provide infrastructure suitable to support additional growth or that remove an existing barrier to growth.

The project will not provide infrastructure that would be suitable to support additional growth or that would remove an existing barrier to growth. The project is located in a developed area with permanent roads, utilities, and infrastructure capable of meeting the access, utilities, and service needs of the proposed project. The project is an urban infill project, making better use of capacity in the existing urban infrastructure. Project features and mitigation measures associated with the project will result in localized improvements to address project-related demand for infrastructure, but would not require new access roads, utilities, or infrastructure that might contribute to indirect growth-inducing impacts.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines provide an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. Such a change refers to an irretrievable commitment of nonrenewable resources, such as those used as building materials, or other environmental changes, such as urbanization, that commit future generations to the use of natural resources. Potential irreversible changes including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The project site is currently vacant and is located in an urbanized area of the City of Los Angeles (City) within the Alameda Corridor. Implementation of the project will represent a continued long-term commitment to use of the site. As a result, the project will involve an irreversible commitment to the use of nonrenewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and sand and mineral resources used in construction materials. However, the project will not require a large commitment of any of these resources, and impacts related to this issue will be less than significant.

The project includes development of a new industrial park consisting of four buildings on a site that is currently vacant and is in an urbanized area that is already served by an existing roadway system and utility infrastructure. Implementation of the proposed project would not commit future generations to using the proposed project site for the proposed land uses.

The project will convert an approximately 13-acre vacant lot into a new industrial park consisting of four buildings that will occupy an approximate total area of 481,022 square feet with 368 parking spaces. As a result, the project will construct an impervious surface on the existing vacant lot, increasing the amount of stormwater flows from the project site. The proposed project would continue to drain into existing City storm drain infrastructure, and runoff from the proposed project site would not exceed the capacity to existing or planned stormwater drainage systems, and would not cause irreversible environmental damage. Therefore, the proposed project would not result in irreversible damage that could result from environmental accidents.

C. CEQA Considerations

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR and the Recirculated Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: Aesthetics/Visual Impacts, Air Quality, Geology and Soil (Geotechnical), Greenhouse Gas Emissions, Land Use, Transportation and Circulation, Noise and Vibration, Visual Resources, Light and Glare, Geotechnical, Water Resources, Air Quality, Cultural Resources, Public Services, Utilities, and Population, Housing and

Employment. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, Growth Inducing Impacts of the project and Energy. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.

4. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR and accordingly provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR.

   Specifically, the City finds that:

   a. The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

   b. The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

c. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or feasible a feasible mitigation measure or alterative not included in the Final EIR.

6. The mitigation measures identified for the original project were included in the Draft EIR and Final EIR. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program ("MMP"). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

7. CEQA requires the Lead Agency approving a project to adopt a Mitigation Monitoring Program ("MMP") or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of Public Resources Code§ 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

9. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

11. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

12. The EIR is a Project EIR for purposes of environmental analysis of the project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions.

13. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, include or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require

substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be recirculated prior to its certification.

IX. Statement of Overriding Considerations

The findings and this Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, the references included in the EIR, the public hearing for the entitlements, and the documents and materials that constitute the record of proceedings.

The EIR has identified a significant and unavoidable impact that would result from the implementation of the proposed project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of the approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. TO adopt a Statement of Overriding Considerations, the decision-maker must balance the economic, legal, social, technologically, or other benefits of a proposed project against its unavoidable environmental risks when determination whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

The City finds that the mitigation measures described in the FEIR will, when implemented, mitigate or substantially lessen all but one of the significant effects identified in the FEIR. A significant traffic impact at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour is unavoidable even after incorporation of all feasible mitigation measures due to the volume of trucks that have been assumed to service the Project based on Institute of Traffic Engineers projections. For this effect, pursuant to Public Resources Code Section 21081(b) and State CEQA Guidelines sections 15093 and 15043, the City has balanced the benefits of the Project against the unavoidable adverse environmental risk in approving it.

In this regard, the City hereby finds that all feasible mitigation measures identified in the FEIR have been and will be implemented with the Project and that any significant unavoidable effects remaining are acceptable due to the following specific economic, social, and other considerations, including but not limited to Project benefits, based upon the findings set forth above, in the FEIR, and in the public record of the consideration of this Project.

The Project's significant and unavoidable adverse impact is the following:

- Traffic impacts at the intersection of Alameda Street and Washington Boulevard during the p.m. peak hour.

Accordingly, the City adopts the following Statement of Overriding Considerations, recognizing that a significant and unavoidable impact could potential result from the implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the project described above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby

finds that the benefits outweigh and override the significant unavoidable impacts for the reasons discussed below.

These stated reasons summarize the benefits, goals, and objectives of the proposed project, and provide, in addition to the findings made above, the detailed rationale for the benefits of the project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the project justify adoption of the project and certification of the completed EIR, notwithstanding certain significant and unavoidable impacts. Many of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the project and justify adoption of the project and certification of the completed EIR. In particular, achieving the underlying purpose for the project would be sufficient to override the significant environmental impacts of the project. The City hereby finds that the following social, economic, and planning benefits of the Project outweigh the p.m. peak hour traffic impact of the Project at the intersection of Washington Boulevard and Alameda Street that would result if 351 truck trips were generated in connection with the operation of the proposed Project.

- The proposed development of the Property for light industrial use will effectuate the goals and policies of the Southeast Los Angeles Community Plan by converting an existing underutilized vacant parcel of land to productive use as a light manufacturing facility on property that is planned and zoned for light industrial use.

- Development of the Project will result in the creation of more than 450 new permanent garment manufacturing jobs. The Project Applicant has entered into a Local Hire Agreement with the Coalition for Responsible Community Development ("CRCD") and the Los Angeles Job Corps, according to which the Applicant will make an assertive effort to hire local residents for at least 50 percent of new employment positions and/or employment positions for which local residents are qualified that become vacant during the term of the agreement. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. The Applicant will also pay a one-time fee of $250,000 to CRCD and the Los Angeles Job Corps. (FEIR, Appendix O).

- The Project Applicant's general contractor has entered into a Construction Local Hire Agreement with Playa Vista Job Opportunities and Business Services ("PVJOBS") for each of the four new buildings to be developed on the Project site, according to which an assertive effort will be made such that 20 percent of all hours worked in construction will be performed by local residents. Priority will be given to local residents in the following order: (i) those living within one mile of the Project site, (ii) those living more than one mile but within three miles of the Project site, and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. An assertive effort will also be made such that included within the 20 percent local hire goal, 10 percent of all hours worked in construction will be performed by at-risk individuals, who are described in the agreement as a local resident who lacks a high school diploma or GED, has a history of substance abuse, has a household income below 50 percent of median, is homeless, a welfare recipient, has a history of involvement with the justice system, is chronically unemployed, or a single parent. (FEIR Appendix O).

- Development of the Project will result in improved public infrastructure due to the dedication and widening of the public right-of-way along Alameda Street, 41st Street, and Long Beach Avenue as well as new curbs, gutters, sidewalks, street trees, street lights, and upgraded traffic control devices.

- The development of the Project as proposed will directly result in increased revenues to the City of Los Angeles through increased property taxes based on an increase of approximately $30 million in assessed value upon completion of construction based on approximate construction costs of between $60.00 and $65.00 per square foot of floor area, and will indirectly result in increased revenues through increased sales and other use taxes from higher rates of employment in the surrounding community.

Based on the entire record of proceedings, the City finds that the foregoing social, economic, and planning considerations outweigh the significant, unavoidable impact of the Project as identified in the FEIR. The substantial evidence demonstrating the benefits of the Project are found in these findings, and in the documents found in the record of proceedings.

The City further fins that none of the public comments to the Draft EIR or subsequent public comments of other evidence in the record, included or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be further recirculated prior to its certification.

OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. The instant authorization is further conditioned upon the privileges being utilized within **three years** after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at www.cityplanning.lacity.org.

Planning Department public offices are located at:

Downtown Office
Figueroa Plaza
201 North Figueroa Street, 4th Floor
Los Angeles, CA 90012
(213) 482-7077

Valley Office
6262 Van Nuys Boulevard, Suite 251
Van Nuys, CA 91401
(818) 374-5050

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either by calling (213) 482-7077 or through the Department of City Planning website at http://cityplanning.lacity.org. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

Vincent P. Bertoni, AICP
Director of Planning

Approved by:

Nicholas Hendricks
Senior City Planner

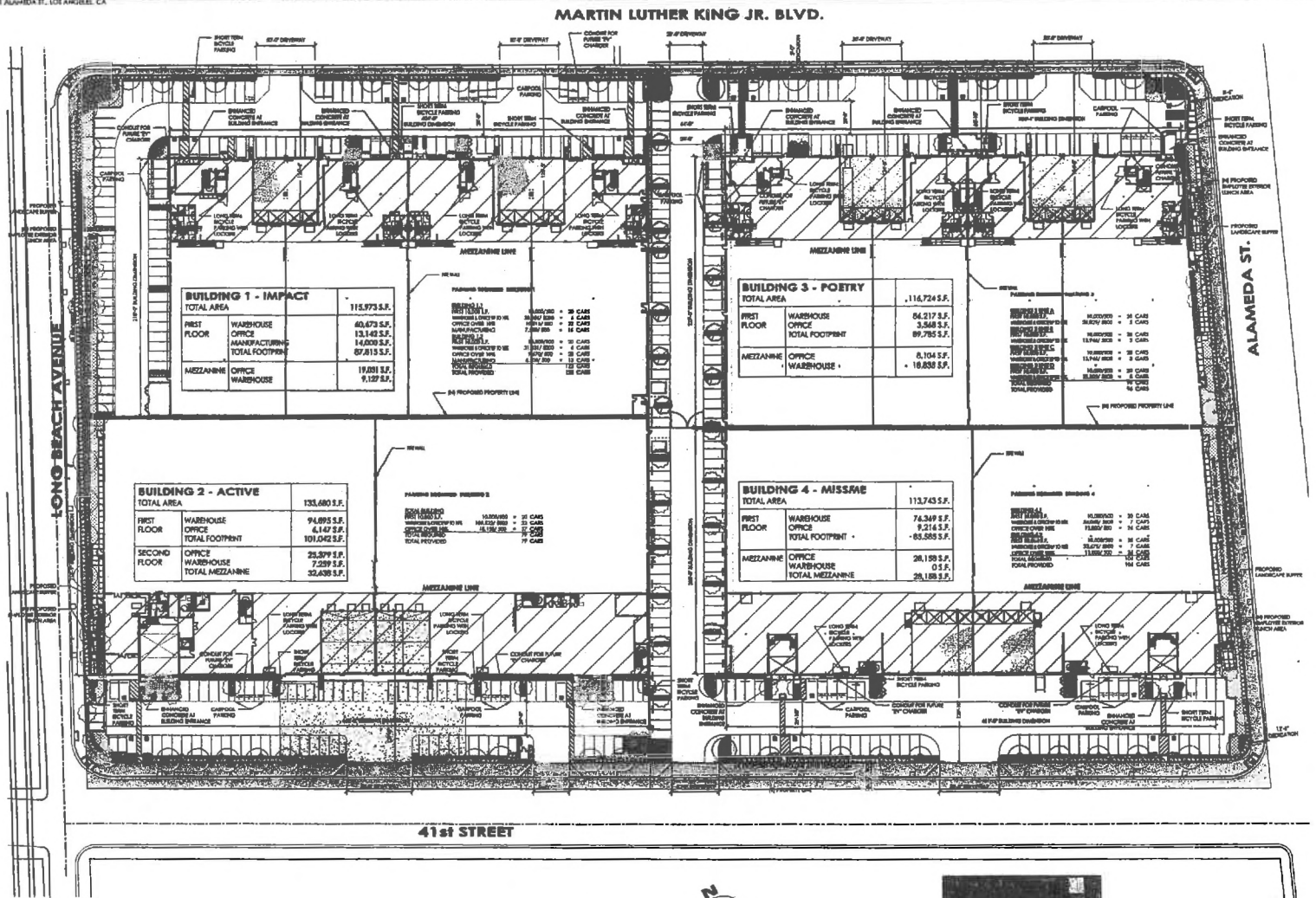
Prepared by:

Jenna Monterrosa
City Planner
jenna.monterrosa@lacity.org
(213) 978-1377

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



SITE PLAN

EXHIBIT "A"
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Case No. DIR-2013-887-SPR



VICINITY MAP

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROU
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4449
FAX (562) 948-1729

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9994 FAX (562)948-1725

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)946-9994 FAX (562)948-1725

SITE ANALYSIS

CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY
SUBJECT TO SRI PLAN REVIEW TO CITY OF LOS ANGELES

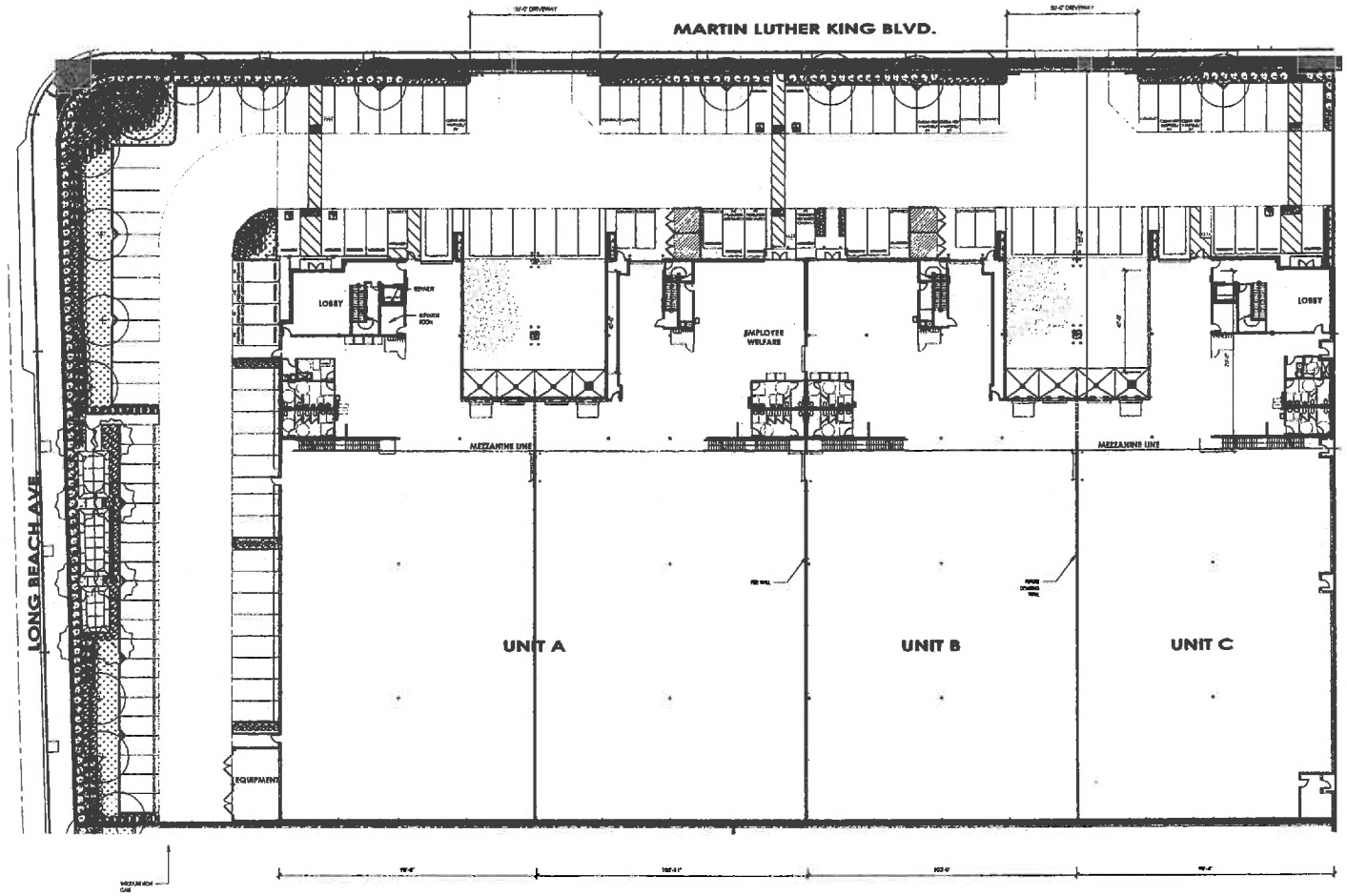
DESCRIPTION	AREAS
ZONING	M 3 (HEAVY MANUF.)
LEGAL DESCRIPTION	S. JEFFERSON ST. Block 31 EL OF ST LOT 3 ALL LOT 1 NW PAR 1 S. JEFFERSON TR. TRACT 31 EXT OF S LOT NW 6 ALL LOT NE PAR 1
ASSESSORS PARCEL NO:	5111-021-023 5111-021-025
BUILDING CODE	CBC 2010
BLDG. OCCUPANCY	A F-1 S-1
BUILDING TYPE	TILT-UP PRE-ENGINEERED
LAND AREA : (PARCEL AREA)	363,317 S.F. (12.70 AC)
COVERAGE :	50%
ALLOWABLE AREA	100%
TOTAL AREA	480,120 S.F.
BUILDING 1 - IMPACT TOTAL AREA	115,973 S.F.
FIRST FLOOR WAREHOUSE	60,673 S.F.
OFFICE	13,142 S.F.
MANUFACTURING	14,000 S.F.
TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE OFFICE	19,031 S.F.
WAREHOUSE	9,127 S.F.
BUILDING 2 - ACTIVE TOTAL AREA	133,680 S.F.
FIRST FLOOR WAREHOUSE	94,895 S.F.
OFFICE	6,147 S.F.
TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR OFFICE	25,379 S.F.
WAREHOUSE	7,259 S.F.
TOTAL MEZZANINE	32,638 S.F.
BUILDING 3 - POETRY TOTAL AREA	116,724 S.F.
FIRST FLOOR WAREHOUSE	84,217 S.F.
OFFICE	3,568 S.F.
TOTAL FOOTPRINT	87,785 S.F.
MEZZANINE OFFICE	8,104 S.F.
WAREHOUSE	18,835 S.F.
BUILDING 4 - MISSAE TOTAL AREA	113,743 S.F.
FIRST FLOOR WAREHOUSE	76,349 S.F.
OFFICE	9,216 S.F.
TOTAL FOOTPRINT	85,565 S.F.
MEZZANINE OFFICE	28,159 S.F.
WAREHOUSE	0 S.F.
TOTAL MEZZANINE	28,159 S.F.
MAIN BLDG. AREA PROVIDED	480 S.F.
LANDSCAPING PROVIDED BUILDING 1	8,361 S.F.
BUILDING 2	7,026 S.F.
BUILDING 3	7,779 S.F.
BUILDING 4 TOTAL = 24,295 OF 290 PARKING AREA, 4065 SAME ON ONE PARCEL + 1 TREE PER EA 4 STALLS	2,493 S.F. 25,659 S.F.

SITE PLAN
A-1

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROU
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-9800
FAX (562) 948-1735

GENERAL CONTRACTOR:
C.E.G.
CONSTRUCTION
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)948-9804 FAX (562)948-1735



BUILDING 1 - IMPACT		
TOTAL AREA		115,973 S.F.
FIRST FLOOR	WAREHOUSE	40,673 S.F.
	OFFICE	13,142 S.F.
	MANUFACTURING	14,000 S.F.
	TOTAL FOOTPRINT	67,815 S.F.
MEZZANINE	OFFICE	19,031 S.F.

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BUILDING 1- FIRST FLOOR PLAN

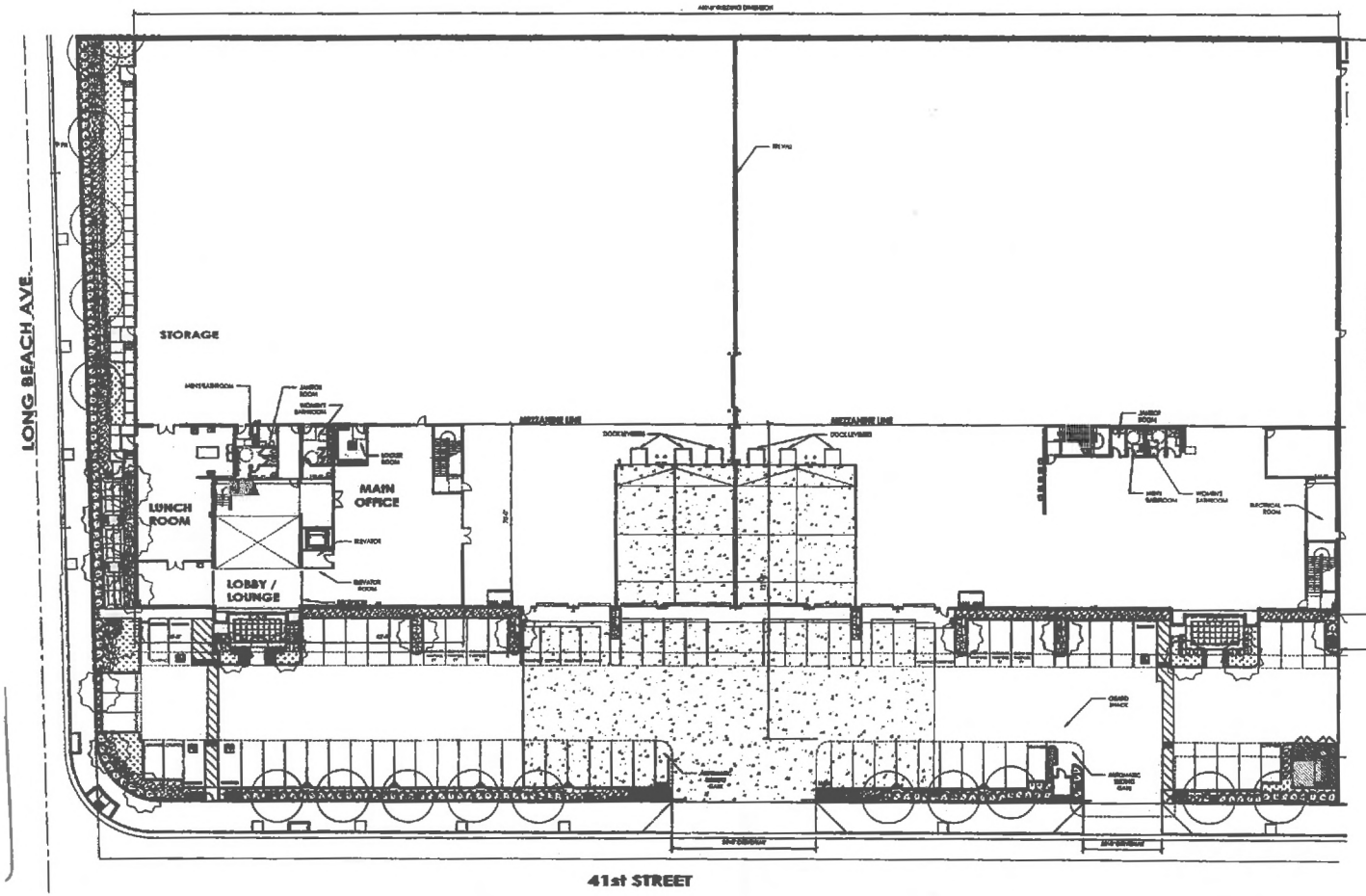
FLOOR PLAN BUILDING 1

A-2A

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



	WAREHOUSE	9,237 S.F.
BUILDING 2 - ACTIVE TOTAL AREA		133,680 S.F.
FIRST FLOOR	WAREHOUSE	94,895 S.F.
	OFFICE	4,147 S.F.
	TOTAL FLOORPRINT	103,042 S.F.
SECOND FLOOR	OFFICE	25,379 S.F.
	WAREHOUSE	7,298 S.F.

BUILDING 2- FIRST FLOOR PLAN

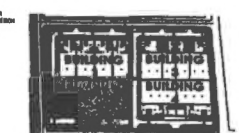
ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROUP

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION

DESIGN:
O.C. DESIGN & ENGINEERING

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KEY PLAN

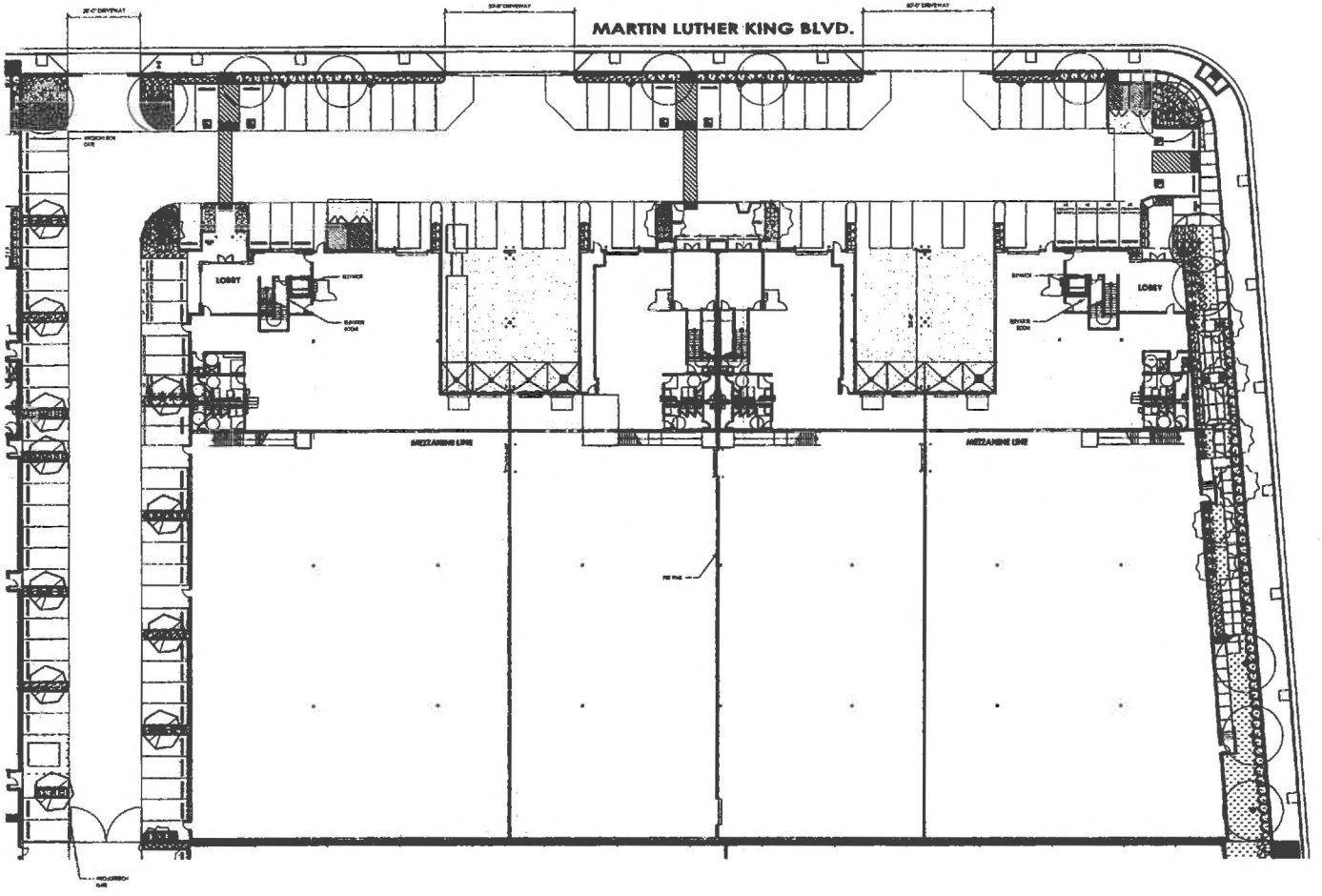
FLOOR PLAN BUILDING 2

A-2B

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



TOTAL AREA		114,724 S.F.
FIRST FLOOR	WAREHOUSE	84,217 S.F.
	OFFICE	5,568 S.F.
	TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE	OFFICE	8,104 S.F.
	WAREHOUSE	18,835 S.F.

BUILDING 3- FIRST FLOOR PLAN

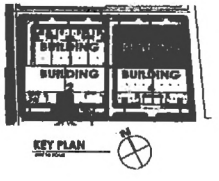
ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROUP
7901 CROSBWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4888
FAX (562) 949-1726

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION
7901 CROSBWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1726

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSBWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1726

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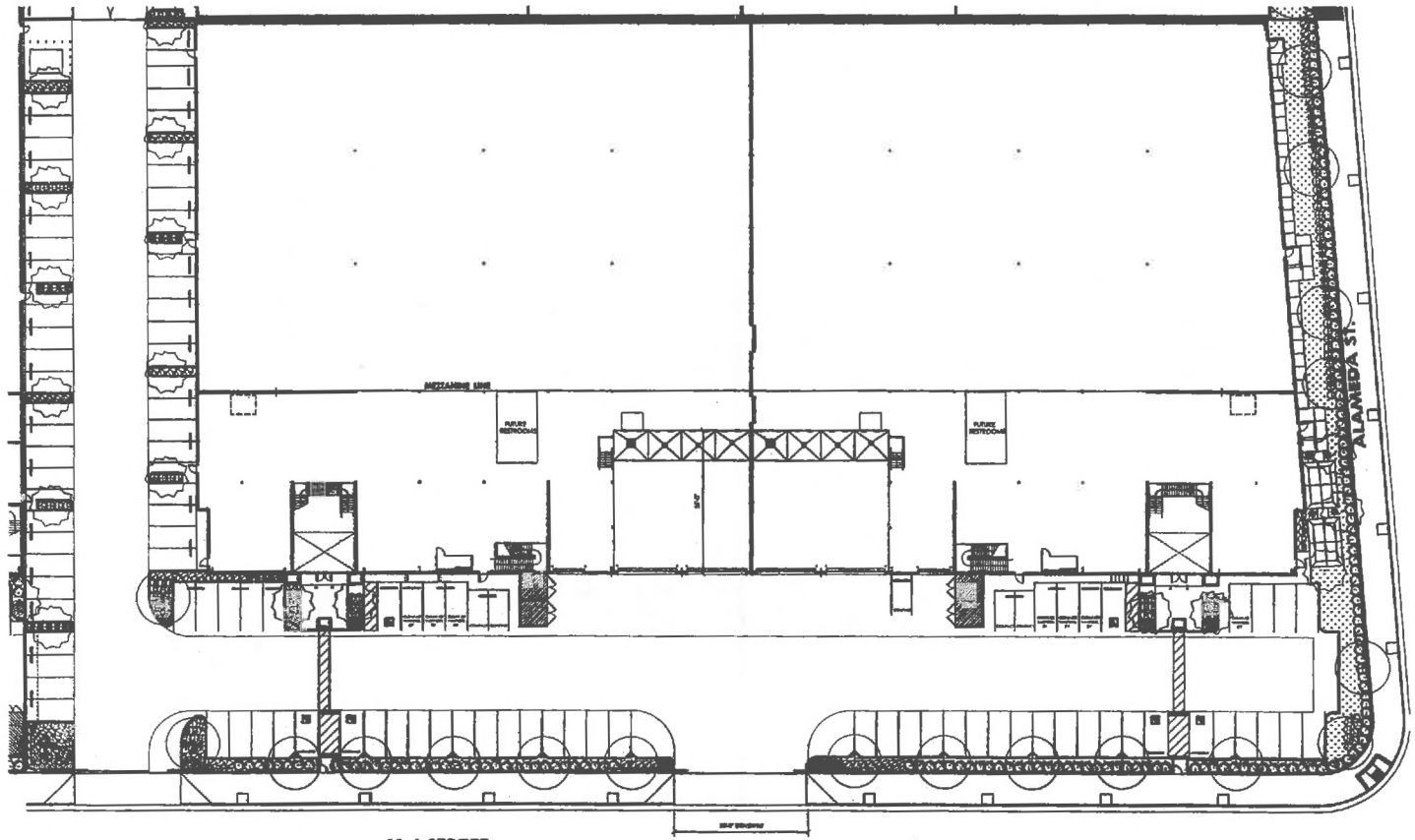
FLOOR PLAN BUILDING 3

A-2C

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST. LOS ANGELES, CA



BUILDING 4 - MASSING		
TOTAL AREA		113,743 S.F.
FIRST FLOOR	WAREHOUSE	76,369 S.F.
	OFFICE	9,216 S.F.
	TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE	OFFICE	28,158 S.F.

BUILDING 4- FIRST FLOOR PLAN

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROUP
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 949-0888
FAX (562) 949-1728

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION
7901 CROSSWAY DR, PICO RIVERA, CA 90660
TEL (562)942-8804 FAX (562)948-1728

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR, PICO RIVERA, CA 90660
TEL (562)942-8804 FAX (562)948-1728

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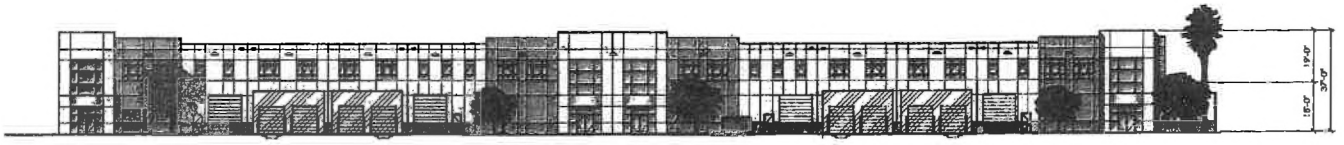
FLOOR PLAN BUILDING 4

A-2D

ALAMEDA INDUSTRIAL PARK

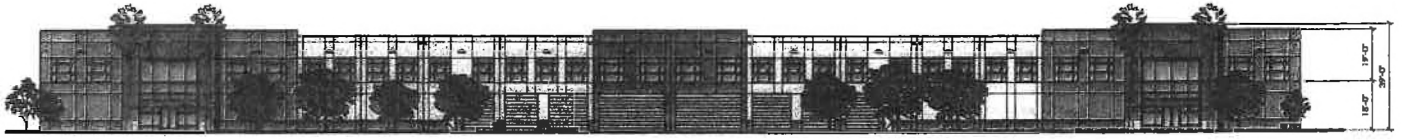
(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST. LOS ANGELES, CA



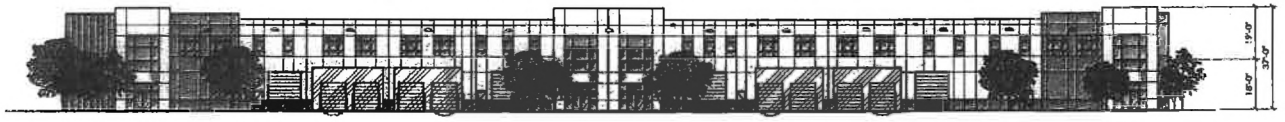
NORTH ELEVATION BUILDING 1

1700 MARTIN LUTHER KING



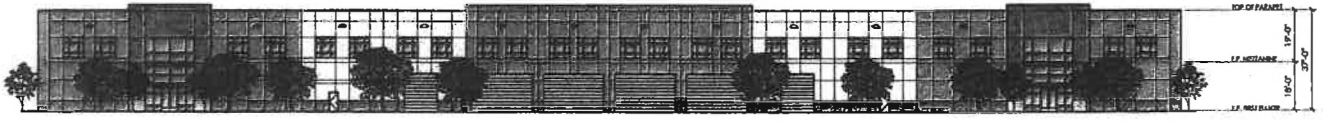
SOUTH ELEVATION BUILDING 2

1701 41st STREET



NORTH ELEVATION BUILDING 3

1800 MARTIN LUTHER KING



SOUTH ELEVATION BUILDING 4

1801 41st STREET

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROU

GENERAL CONTRACTOR:
C.E.G.
CONSTRUCTION

DESIGN:
O.C. DESIGN & ENGINEERING

EXHIBIT "A"
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Case No. DIR-2013-887-SPR

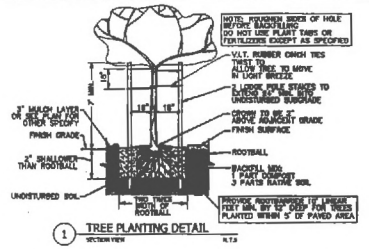
ELEVATIONS

A-3

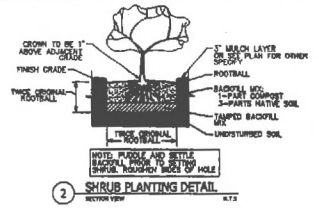
PLANTING NOTES

1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to shortage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to bid/price preparation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 feet of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydroseeding, and related groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and operation of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be hydroseed and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.
   - 4 cu. yds. redwood compost organic compost
   - 50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be six sides up, and two inches shallower than the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and weeding, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

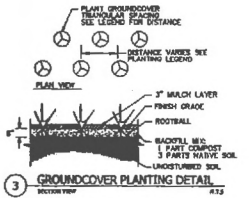
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S.



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S.



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S.

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagerstroemia Indica	Crape Myrtle	36" box	2	M	multi trunk
	Lagerstroemia Indica	Crape Myrtle	24" box	9	M	
	Tephrosiemon cortetus	Brisbane box	24" box	15	M	
	SHRUB					
	Nuxiflora japonicum 'Texanum'	Texas Privet	5 gal	146	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	46	M	
	Raphiolepis Indica 'Ballerina'	Indian Hawthorn	5 gal	47	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	133	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	107	M	
	Hemerocallis hybrids	Daylily	1 gal	59	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	flats	44	M	plant @ 12" o.c.

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Case No. DIR-2015-887-SPR

MARTIN LUTHER KING JR.

LONG BEACH AVE.

BUILDING #1

0' 20' 40' 50' 80'

N

UNDERGROUND SERVICE ALERT
CALL TOLL FREE 1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

Linear Style Planting with DeepRoot Barriers

Determine the overall number of panels to be used. Depending upon the actual planting plan and the number of trees behind the length of these panels will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 5 feet (60inch). This will be the number of feet necessary for a linear style planting application. (See chart below.)

Dig the trench to the depth listed upon the particular barrier chosen.

Install the barrier, then using Deepfeet Linear Barrier shield and the appropriate number of panels cut at the line where recommended and overlap the panels of the correct length. Then installing Deepfeet Shielded Barrier by at least making one slit and 1 join the appropriate number of panels together.

Next place the barrier in the trench with the surface of the tree behind the barrier and adjacent to the curb. Backfill the trench and water thoroughly to settle the soil. Be careful not to damage the barrier during backfill. Do not backfill against the barriers to provide a clean install. If for the following the soil is over the barrier's double top edge at least 1/4" (10mm) above grade to ensure that all soil does not run off.

Pack the backfill the planter style offers a more versatile method to use with the barrier and can be used in many applications. Simply place the barrier in the ground as directed above and backfill the planter. Be sure to water thoroughly to settle the soil. Add amended for planting the soil recommendations.

If the backfill will be subject to subsidence such such as base material or small backfilling and compaction of the backfill is necessary, then it is recommended that the base of every barrier be packed down from bottom by small hammer, tree trimmer and small mallet.

For additional information please consult the 16 pro Deepfeet Product Installed and Installation Guidelines.

For information regarding additional plans with 1 root per tree, please refer to the root control information in other Deepfeet Product Installation Guidelines or contact Deepfeet Customer Support at 1 800 BARRIER (800/227-7437).

For a simple formula to determine the quantity of panels required for a linear application use:
Intended Diameter of the Tree Canopy at Maturity + 5' (60inch) = Length of Barrier per Side.

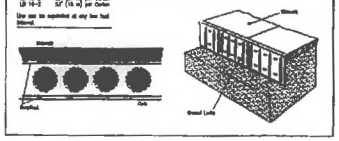
For One Side of Tree Canopy Diameter	Number of Feet of Linear Barrier Required	Number of Panels
10 Feet (120inch)	15 Feet	3 Panels
15 Feet (180inch)	20 Feet	4 Panels
20 Feet (240inch)	25 Feet	5 Panels
25 Feet (300inch)	30 Feet	6 Panels
30 Feet (360inch)	35 Feet	7 Panels

Note: Linear Barriers (24" D x 2 and 18" D) are packaged in 5' (60inch) box panels with 2 pre-attached flexible joiner strips for the cut ends of the barrier and hand to ease installation at the cut ends.

24" D x 2' W	10' (120 in) per Carton
18" D x 2' W	15' (180 in) per Carton

One can be separated at any two foot (60inch).

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.



REVISIONS	BY
05-27-2015	
03-28-2016	

PHIL MAY LANDSCAPE ARCHITECT
1937 West 9th Street
Upland, CA 91786
Phone: 909 373 1959
Fax: 909 373 1958

PLANTING PLAN

COMMERCIAL BUILDING #1
1709 MARTIN LUTHER KING
LOS ANGELES, CA 90058

DRAWN P.S.
CHECKED P.M.
DATE 12/29/14
SCALE 1" = 20'
JOB NO. 14118
SHEET L-1
OF 3 SHEETS

IRRIGATION NOTES

1. It is the responsibility of the Irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and parking, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative, in the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.

5. The irrigation system design is based on a minimum operation pressure of 60 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any differences between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1-1/2" in diameter and larger. Where roots 1-1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.

8. All main line piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeves shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop-up bodies.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material - see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U-staples at 5' on center (24" on center around tight curves). In steeply sloped terrain, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amsby, or approved equal, and shall be marked "D.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.

15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per Hour(S) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL / DESCRIPTION	PATR.	GPM	PSI	RAD	UNIT
	METAFRM	FLUSH VALVE IN 6" VALVE BOX MODEL # TLDSSMPV-1					C
	RAINBIRD	3/4" QUICK COUPLER-SXDRC					E
	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW120 WEATHER STATION MOUNT TO POLE PER MANUF. SPEC'S.					F
	ANY APPROVED	PVC SCH. 40 SLEEVING-PROVIDE WHERE REQUIRED (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	METAFRM	RECHARGE CV, RCV-1-12 LINES LAYOUT @ 18" O.C.	0.60 GPH	30			H
	METAFRM	CONTROL ZONE LVC2SSSHOSPS-HV, FLOW RATE 3.5-17.4 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	WILKINS	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

NOTE: CONTRACTOR TO PROVIDE IRRIGATION SLEEVING WHERE REQUIRED

VALVE NUMBER / GPM / VALVE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
(Last Column = (ETo) (0.62) * ((0.45 x LA) + ((1 - 0.45) x SLA)) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration (inches per year)
0.62 = Conversion Factor (to gallons per square foot)
SLA = Special Landscape Area (square feet)
LA = Landscape Area (square feet)
0.45 = Conversion factor (to gallons per square foot)

MAWA Calculations	ETo		ETAF		LA or (SLA (62)		Conversion		MAWA (Gallons Per Year)
Subtotal for LA=	55.1	x	0.7	=	7,211	x	0.62	=	155,751.69
Total MAWA =					7,211				155,751.69 (ccf/yr)

Estimated Annual Water Use
(Last Column = (ETo) x (0.62) x ((PF x HA / IE) + SLA)) = Gallons per year

where:
EAWU = Estimated Annual Water Use (gallons per year)
ETo = Reference Evapotranspiration (inches per year)
PF = Plant Factor (see Table 3)
HA = Hydrozone Area (square feet)
IE = Irrigation Efficiency (see Table 4)
SLA = Special Landscape Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

PF = Irrigation Management Efficiency (IME)
IE = Distribution Uniformity of irrigation Sweat

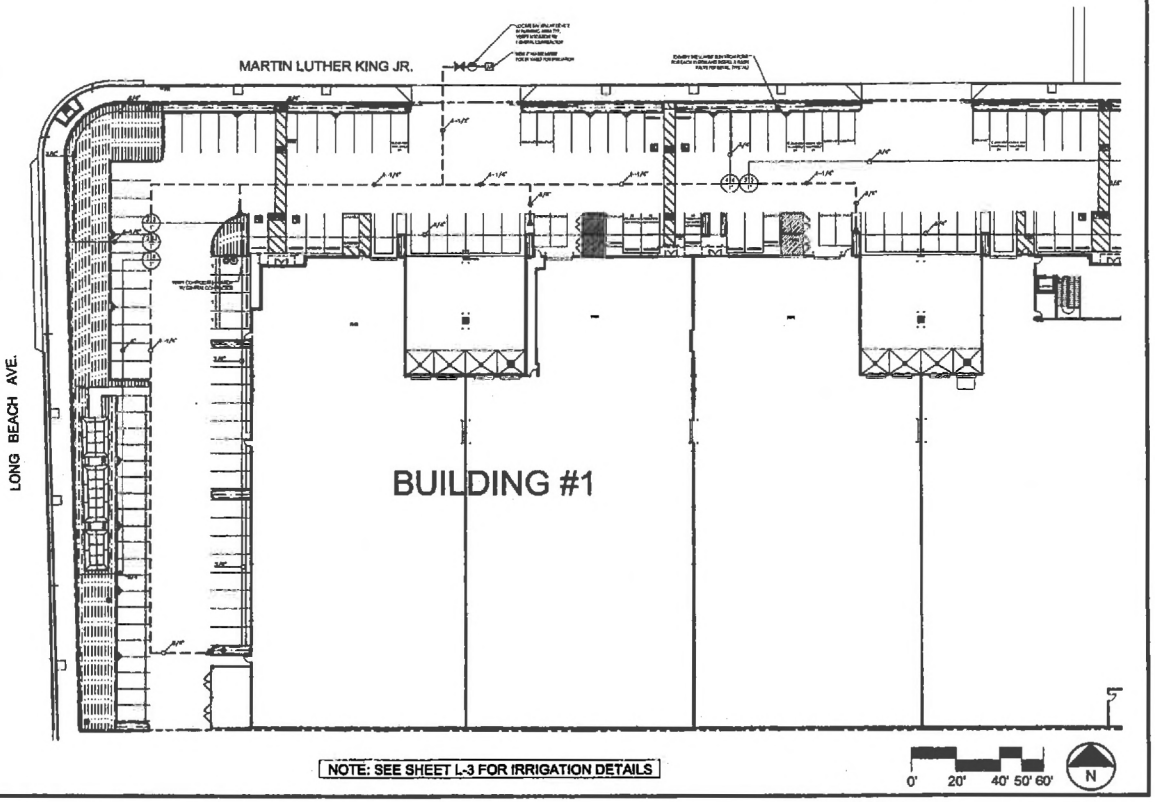
ESTIMATED Calculations	ETo		PF		HA		Conversion		IE		ESTIMATED Water Use (Gallons per year)
Adequate Water Using Shrub	55.1	x	0.55	=	7,211	x	0.62	=	0.55	=	155,751.69
Total EAWU =					7,211						155,751.69 (ccf/yr)

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Minimum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88

EXHIBIT "A"
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Case No. DIR-2013-887-SPR

UNDERGROUND SERVICE ALERT
1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

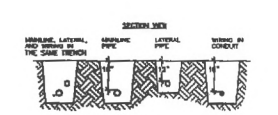
REVISIONS	BY
05.27.2016	
03.28.2016	

PHIL MAY LANDSCAPE ARCHITECT
1057 West 9th Street
Upland, CA 91786
Phone: 909 373 1959
Fax: 909 373 1958

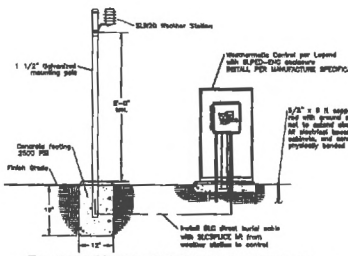
IRRIGATION PLAN

COMMERCIAL BUILDING #1
1700 MARTIN LUTHER KING
LOS ANGELES, CA 90058

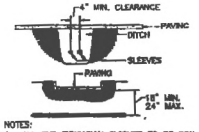
DESIGN P.M.
DRAWN P.M.
CHECKED P.M.
DATE 12/02/14
SCALE 1" = 20'
JOB NO. 1411B
SHEET L-2
OF 3 SHEETS



PIPE & WIRE TRENCHING
TYPICAL DETAIL N.T.S



WEATHERMATIC CONTROLLER WITH PEDESTAL
N.T.S



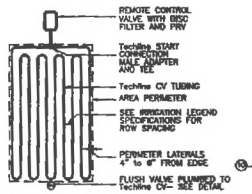
NOTES:
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

SLEEVES
N.T.S

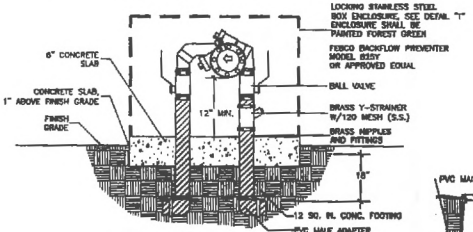
IRRIGATION LEGEND

SYMBOL	MFR	MODEL / DESCRIPTION	PATT.	WPC	PSI	GAL	DET
	HUNTER	ICZ-101-40 IN 6" VALVE BOX MODEL # TURFWAY-1					B
	RAINBIRD	3/4" QUICK COUPLER-XSDAC					B
	MAINTENANCE	ELW26 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	MAINTENANCE	ELW26 WEATHER STATION MOUNT TO POLE/WALL MANUF. SPECS.					F
	ANY APPROVED	PVC SCH. 40 SLEEVING-APPROVED WHERE REQUIRED (NO LAMP TYPES ARE SPE					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SEE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SEE AS INDICATED ON PLAN					
	HUNTER	TECHLINE CV, ELEVATE WIRE LATERAL 8 18" O.C.	ELBC 06PK	30			H
	HUNTER	CONTROL ZONE VALVE ASSEMBLY, FLOW RATE AS NOTED					J
	HUNTER	BALL VALVE-LINE SIZE					K
	WILKINS	BODY REDUCED PRESSURE ASSEMBLY-DOUBLE CHECK-LINE SIZE					L

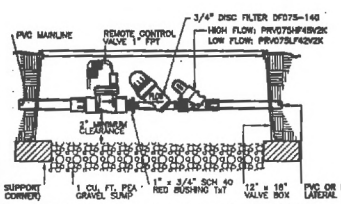
NOTE: CONTRACTOR TO PROVIDE BARB ADAPTER BUSHING WHERE REQUIRED



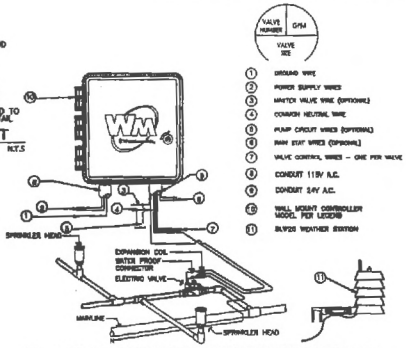
TECHLINE CV END FEED LAYOUT
N.T.S



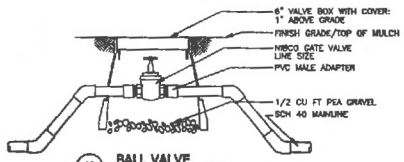
BACKFLOW PREVENTER
N.T.S



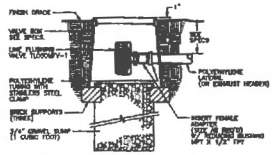
HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY
HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM
N.T.S



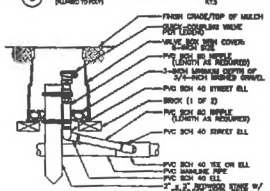
WEATHERMATIC SMART LINE SERIES CONTROLLER
N.T.S



BALL VALVE
N.T.S

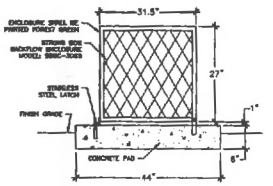


Techline LINE FLUSHING VALVE
(PLUMBED TO POLY)
N.T.S



NOTE:
1. CONTRACTOR TO PROVIDE AIR GAP PIPING APPROVED AND SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE FILLY SIZE.

QUICK COUPLING VALVE
N.T.S



BACKFLOW ENCLOSURE
N.T.S

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Case No. DIR-2013-887-SPR

UNDERGROUND SERVICE ALERT
CALL TOLL FREE
1-800
422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-2016	
03-26-2018	

PHIL MAY LANDSCAPE ARCHITECT
1937 West 9th Street
Upland, CA 91786
Phone: 909 373 1959
Fax: 909 373 1958
phil@philmaydesign.com
www.philmaydesign.com

IRRIGATION DETAILS PLAN

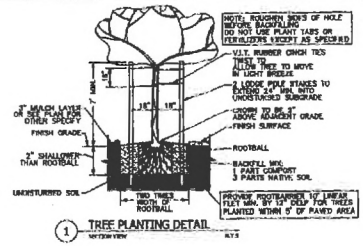
COMMERCIAL BUILDING #1
1700 MARTIN LUTHER KING
LOS ANGELES, CA 90058

DRAWN: R.B.
CHECKED: P.M.
DATE: 12/29/16
SCALE: 1" = 20'
JOB NO: 1411B
SHEET: L-3
OF 3 SHEETS

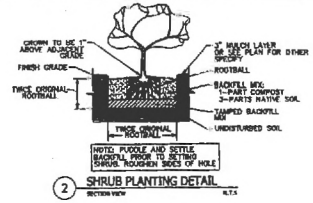
PLANTING NOTES

1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall take priority over quantities enumerated. Discrepancies between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 feet of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all soil/water erosion trees, shrubs, vines, seeded/sodded turf, hydromulches, and planted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.
   Amend per 1000 square feet
   4 cu. yds. nitrogen stabilized organic compost
   50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearances within ninety (90) days of completion of construction. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

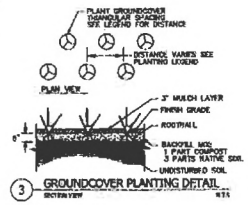
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S.



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S.



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S.

PLANT LEGEND

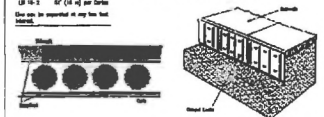
SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagerstroemia indica	Crape Myrtle	24" box	19	M	
	Lophostemon confertus	Brisbane box	24" box	15	M	
	SHRUB					
	Ligustrum japonicum 'texanum'	Texas Privet	5 gal	145	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	26	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	30	M	
	Galliteman 'Little John'	Dwarf Bottlebrush	5 gal	72	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	122	M	
	Hemerocallis hybrids	Daylily	1 gal	187	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	flats	28	M	plant @ 12" o.c.

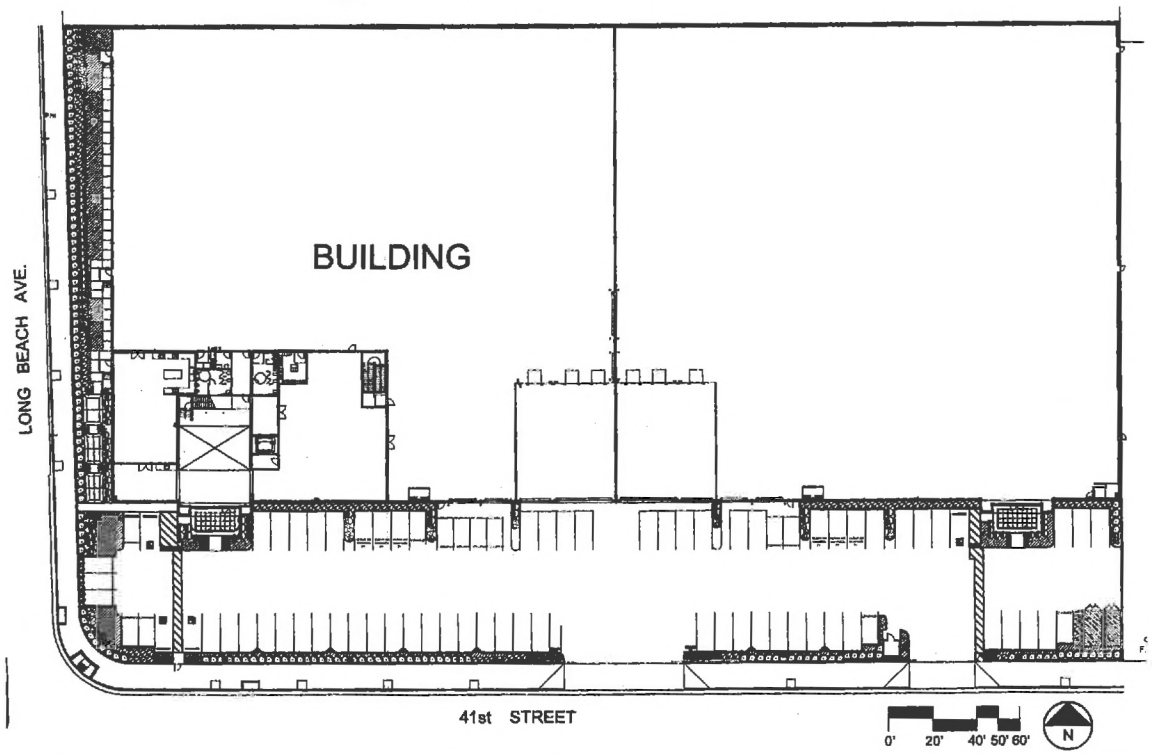
EXHIBIT "A"
Page No. 10 of 18
Case No. DIR-2013-887-SPR

UNDERGROUND SERVICE ALERT
CALL TOLL-FREE 1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

Linear Style Planting with DeepRoot Barriers

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





REVISIONS
05-27-15
3/26/2015

PHIL MAY LANDSCAPE ARCHITECT
1957 West 9th Street
Upland, CA 91786
Phone: 909 373 1959
Fax: 909 373 1958

PLANTING PLAN

COMMERCIAL BUILDING #2
1701 41st. ST.
LOS ANGELES, CA

Drawn: R.R.
Checked: P.M.
Date: 12/2/2014
Scale: 1" = 20'
Job No.: 14118
Sheet: L-1
of 3 sheets

IRRIGATION NOTES

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12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.
13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specific material -- see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be flamp stated in place with U-staples at 5' on center (24" on center around tight curves), in steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (on industrial as plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.
14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtrol, or approved equal, and shall be marked "ELY" for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.
15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.
16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.
17. Pressure test mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATT.	GPM	PSI	RAD	KEY
	HUNTER	FLUSH VALVE IN 6" VALVE BOX MODEL # ICZ075PRS-V-1					C
	RAINBIRD	3/4" QUICK COUPLER-35DRC					E
	WEATHERMATIC	1180D SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 W EATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SEE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SEE AS INDICATED ON PLAN					
	HUNTER	TORNINE CV, RCV6-12 LINES LAYOUT @ 18" O.C.	ILSS	GPH	30		H
	HUNTER	CONTROLLER WCI600I6SPS-HP, FLOW RATE 3.5-17.6 GPM					J
	KIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE AMTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER | GPM | VALVE SIZE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo - 0.7 x LA or Eq. FLA/0.62) = 0 cubic feet per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration (Appendix C (inches per year)
0.7 = Reference Evapotranspiration Adjustment Factor (ETAF)
LA = ETAF for Newly Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

LAWA Calculation

	ETo		ETAF		LA or ELA (SF)		Conversion		Gallons (Gallons Per Year)
MAWA for LAs	59.1	x	0.7	x	0.000	x	0.62	=	0
Total MAWA =					0.000				0

Estimated Applied Water Use
EAWU = Pcrit x (LA x Kl) + RL + Outlets per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration (Appendix C (inches per year)
PE = Precipitation Effective
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
Kl = Irrigation Efficiency = PE / ETo (For Advice in Appendix E for example E parameters)

PE = Irrigation Inefficiency (PE)
Kl = Distribution Uniformity of Irrigation Area

RL = Area Rain Flow
RL = Irrigation Meter Design = 0 (0.62 gpm GALLONS PER for refund)
RL = Annual Water Needs = 0.0 x Kl(ETo) PRECIPITATION for Monthly water amount
RL = Maintenance Water Design = 0.0 x PE (Low GALLONS)

EAWU Calculation

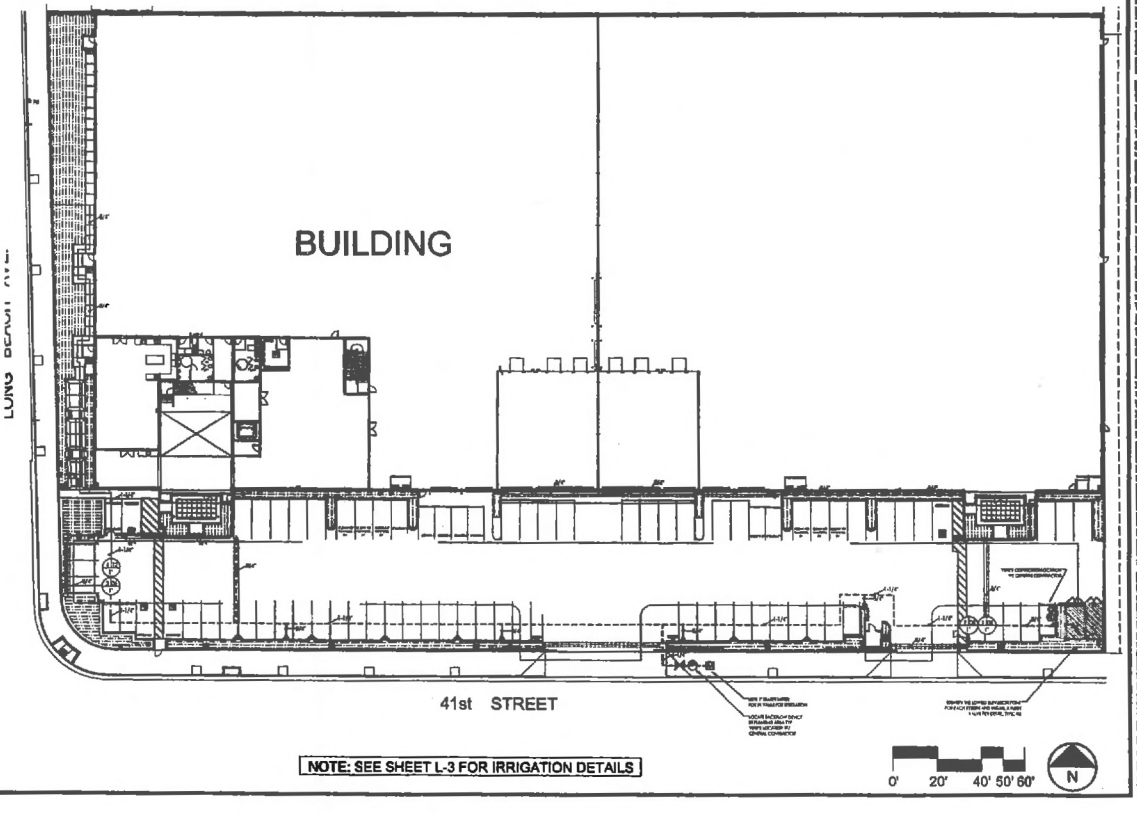
	ETo		PE		LA		Conversion		Kl		EAWU (Gallons per year)
Medium Water Using Shrub	ETo	x	0.59	x	0.000	x	0.62	=	0.62	=	0
Total EAWU =					0.000						0

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88

EXHIBIT "A"
Page No. 11 of 18
Case No. DIR-2013-887-SPR

UNDERGROUND SERVICE ALERT
1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG



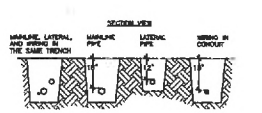
REVISIONS	BY
05-27-15	
3/26/2016	MT

PHIL MAY LANDSCAPE ARCHITECT
1837 West 9th Street
Upland, CA 91786
Phone: 909 373 1958
Fax: 909 373 1958

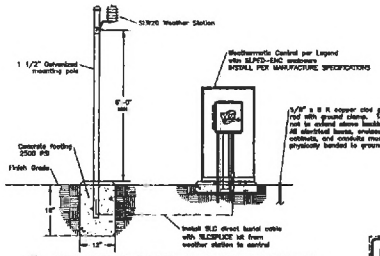
IRRIGATION PLAN

COMMERCIAL BUILDING #2
1701 41st. ST.
LOS ANGELES, CA

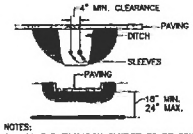
DESIGNED R.S.
DRAWN P.M.
DATE 12/29/14
SCALE 1" = 20'
JOB NO. 14116
SHEET L-2
OF 3 SHEETS



PIPE & WIRE TRENCHING
TYPICAL DETAIL N.T.S

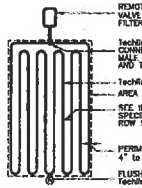


F WEATHERMATIC CONTROLLER WITH PEDESTAL
N.T.S



NOTES:
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

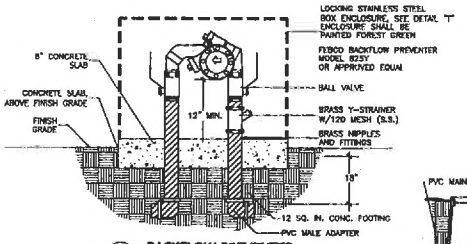
G SLEEVES
N.T.S



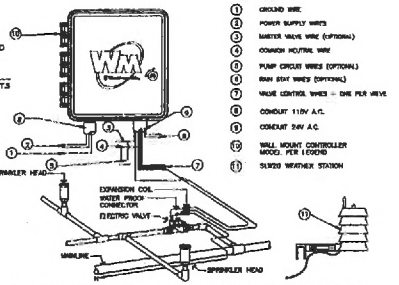
H TECHLINE CV END FEED LAYOUT
N.T.S

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATR.	GPM	PSI	RADIUS	DET
	MEGAFLOW	FLUSH VALVE IN 6" VALVE BOX MODEL # TUBEMAP-V-1					C
	RAINBIRD	3/4" QUICK COUPLER 325PC					E
	WEATHERMATIC	SURFACE MOUNTED, PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SWS20 WEATHER STATION MOUNT TO POLE PER MANUF. SPEC'S.					
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAINLINE SIZE AS INDICATED ON PLAN					
	MEGAFLOW	TECHLINE CV, TUCV6-12 DRIP EMITTER @ 18" O.C.	CLEAR (GPH)	30			H
	MEGAFLOW	CONTROL ZONE KV(ESBR1027)-MP, FLOW RATE 2.5-17.5 GPM					J
	NIBCO	BALL VALVE, LINE SIZE					K
	NIBCO	825Y ANTI-SIPHON PRESSURE ANTISIPHON DRAIN-E LINE SIZE					L



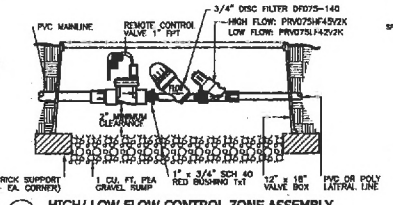
L BACKFLOW PREVENTER
N.T.S



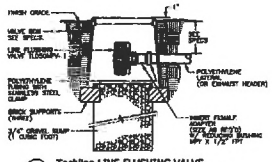
VALVE NUMBER | GPM | VALVE SIZE

1. GROUND WIRE
2. POWER SUPPLY WIRES
3. MASTER VALVE WIRE (OPTIONAL)
4. COMMON NEUTRAL WIRE
5. PUMP CIRCUIT WIRES (OPTIONAL)
6. RAIN STAY WIRES (OPTIONAL)
7. VALVE CONTROL WIRES - ONE PER VALVE
8. CONDUIT 110V A/C
9. CONDUIT 24V A/C
10. WALL MOUNT CONTROLLER MODEL PER LEGEND
11. SWS20 WEATHER STATION

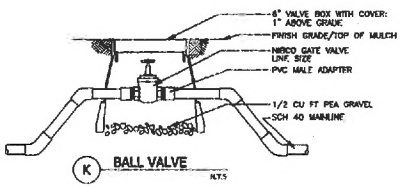
F WEATHERMATIC SMART LINE SERIES CONTROLLER
N.T.S



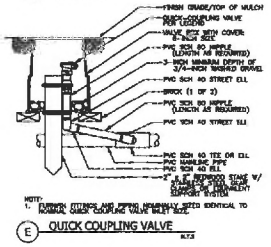
J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY
HIGH=4.3 - 17.5 GPM OR LOW= 0.33 - 4.4 GPM N.T.S



C Techline LINE FLUSHING VALVE
(PLUMBED TYPICAL) N.T.S



K BALL VALVE
N.T.S

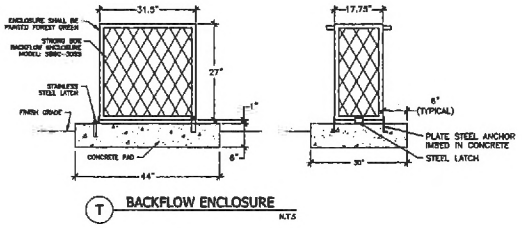


NOTE:
1. VARIOUS FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO QUICK COUPLING VALVE SIZE.

E QUICK COUPLING VALVE
N.T.S

EXHIBIT "A"
Page No. 12 of 18
Case No. DIR-2018-887-SPR-





T BACKFLOW ENCLOSURE
N.T.S

REVISIONS BY
08-27-15
3/26/2018 MT

PHIL MAY LANDSCAPE ARCHITECT
1909 West 9th Street
Upland, CA 91786
Phone: 909 373 1958
Fax: 909 373 1958

IRRIGATION DETAILS PLAN

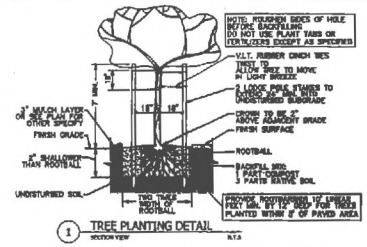
COMMERCIAL BUILDING #2
1701 41st. ST.
LOS ANGELES, CA

DRAWN BY: RJS
CHECKED BY: PJM
DATE: 12/29/14
SCALE: 1" = 20'
JOB NO.: 14118
SHEET: L-3
OF 3 SHEETS

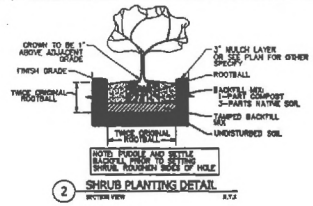
PLANTING NOTES

1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over numbers enumerated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion at pick-up work.
3. The Contractor shall examine site graded within 0.10 feet of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and fertilizer groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal:
   Amount per 1000 square feet
   4 cu. yds. cubic yards redwood organic compost
   20 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and weeding, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

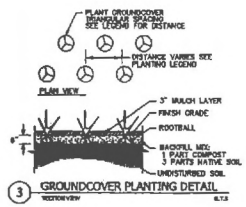
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S.



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S.



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S.

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
TREES						
	Arbutus 'Marina'	NCN	24" box	11	M	
	Lagerstroemia Indica	Crape Myrtle	36" box	9	M	multi trunk
	Lagerstroemia Indica	Crape Myrtle	24" box	9	M	
	Lophostemon confertus	Brisbane box	24" box	5	M	
SHRUB						
	Ligustrum Japonicum 'Texanum'	Texas Privet	5 gal	89	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	55	M	
	Rophiolepis Indica 'Ballerina'	Indian Hawthorn	5 gal	26	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	91	M	
PERENNIALS						
	Dietes bicolor	Fortnight Lily	1 gal	106	M	
	Hemerocallis hybrida	Daylily	1 gal	127	M	mixed colors
GROUND COVER						
	Trachelospermum jasminoides	Star Jasmine	flats	22	M	plant @ 12" o.c.

EXHIBIT "A"
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Case No. DIR-2013-887-SPR



Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the added planting area and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the established project average diameter of the tree and add 2 feet (60cm), this will be the number of feet necessary for a linear style planting application. (See chart below.)

1. Dig the trench to the depth listed upon the particular barrier shown.
2. Install the barrier. Once each required linear barrier length and the appropriate number of panels and or top has been predetermined and exposed the barrier of the correct length, then beginning furthest from location 1, place barrier one and install & join the appropriate number of panels together.
3. Next, the trench the linear side where a seam connection during panels exist, loosen soil and add drainage conditioner over soil to the added planting area. Take steps to ensure loosened planter of the top of a trench. Install with a level shovel for planting tips and recommendations.
4. If the trench will be added to maintenance work such as lawn mowing or weed trimming, be careful to avoid damage to the installation of DeepRoot. You should maintain soil to ground around the base of young trees to protect them from damage by lawn mowers, lawn trimmers and weed whackers.

For additional information please consult the 16 page Installation Product Selection and Installation Guidelines.

For information regarding distribution please call 1 800 EEP ROOT (800.733.7668) For help with difficult designs or other difficult installation challenges please call DeepRoot's technical support at 1 888 DEEP ROOT (888.733.7668).

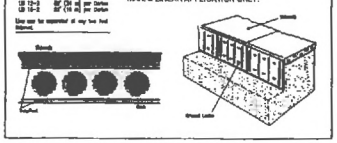
For a simple formula to determine the quantity of panels required for a linear application see:

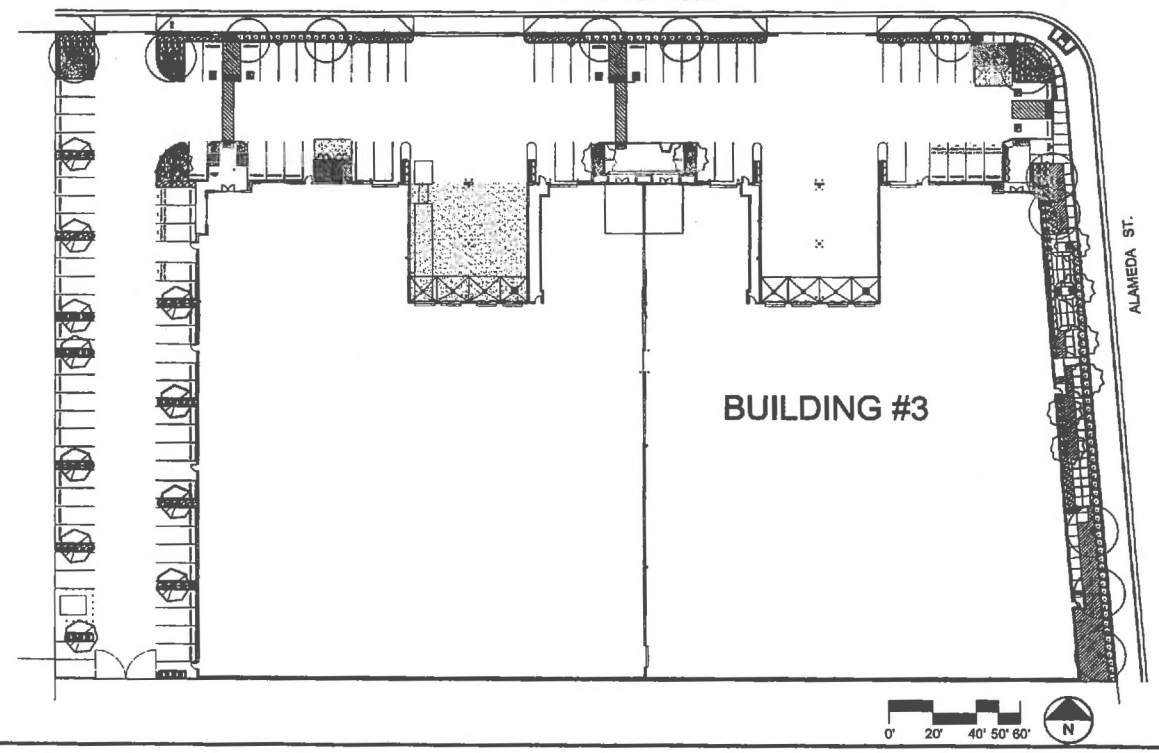
Estimated Number of the Tree Canopy at Maturity + 2' (24cm) = Length of Barrier per Side

At Fifty or one side of the tree may shall factor for root diameter as there may be an advantage when where requiring protection.	For One Side of Tree: Expected Tree Canopy at Maturity	Number of Feet of Linear Barrier (LB 12 or LB 18)	Estimated Estimated Number (LB) in number of Panels
Under Linear planters (LB 12-2 and LB 18-2) are ordered in 2' (24cm) long sections with integrated deflector shield used to join one of the panels and install in one continuous line of up to:	4-6' (120cm) diameter	4-6' (120cm)	7 Panels
	6-8' (180cm) diameter	6-8' (180cm)	10 Panels
	8-10' (240cm) diameter	8-10' (240cm)	13 Panels
LB 12-2 LB 18-2	50' (15.24 m) per Order 50' (15.24 m) per Order		

Lines may be segmented at any two feet intervals.

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





REVISIONS	BY
05-27-15	
5/27/2016	MT

PHIL MAY LANDSCAPE ARCHITECT
1937 West 9th Street
Upland, CA 91786
Phone: 909 373 1958
Fax: 909 373 1958

PLANTING PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

DRAWN: P.S.
CHECKED: P.M.
DATE: 12/29/14
SCALE: 1" = 20'
JOB NO: 14118
SHEET: L-1
OF 3 SHEETS

IRRIGATION NOTES

1. It is the responsibility of the Irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.
2. The Contractor shall not blindly install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative, in the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.
3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.
4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.
5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.
6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.
7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1-1/2" in diameter and larger. Where roots 1-1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been severed under shall be wrapped in wet burlap and kept moist while the trench is open.
8. All main line piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sizes shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.
9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.
10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop-up bodies.
11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.
12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.
13. Drip tubing shall be installed in parallel runs (wherever possible) 18" apart on top the finish grade, and covered with 3" of specific material— see planting plan. Emitter spacing of adjacent runs staggered. Tubing shall be firmly staked in place with U-staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing runs perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.
14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtrol, or approved equal, and shall be marked "C.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connections in valve box as per details.
15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.
16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.
17. Pressure test mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL / DESCRIPTION	PATT.	GPM	PSI	RAD	KEY
	METAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # FLUSHMFV-1					D
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
	WEATHERMARC	XLERO SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMARC	XLERO WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	METAFIM	TECHLINE CV, TLCV9-12 LINES LAYOW @ 18" O.C.		0.60 GPH	30		H
	METAFIM	CONTROLZONE LVCC060 100734-HF, FLOW RATE 2.0-11.4 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER / GPM / VALVE SIZE

Point of Connection # 1

Reserved Applied Water Allowance (MAWA)

Where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ET$_o$ = Reference Evapotranspiration (Appendix C, inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ET$_o$		ETAF		LA or SLA (SF)		Conversion		MAWA (Gallons Per Year)
SLAWN for LA=	40.1	x	0.7	x	9,705	x	0.62	=	135,648.69
Total MAWA =					9,705				135,648.69 Gals / Year

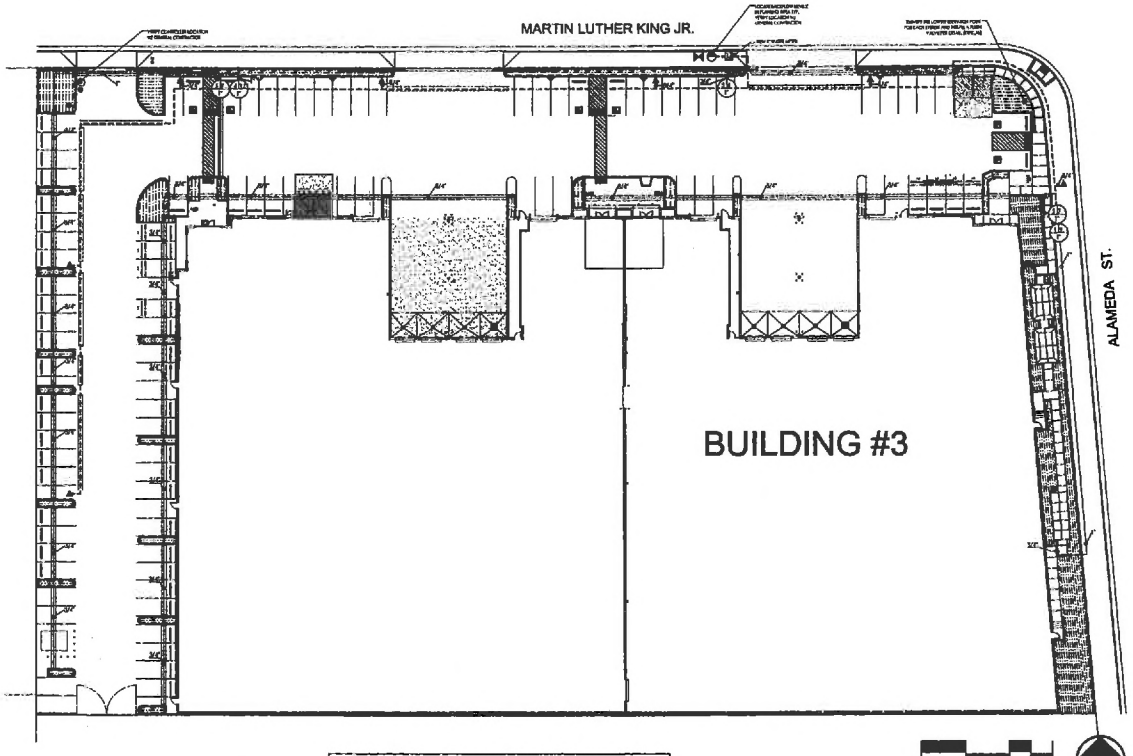
Estimated Applied Water Use

ETAF Calculation:

	ET$_o$		KL		LA		Conversion		SE		(ETo)(KL)(LA)(SE)(C) per year)
Medium Water Using Shrub	40.1	x	0.55	x	9,705	x	0.62	x	0.85	=	130,488.69
Total ETAF =					9,705						130,488.69 Gal / Year

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

EXHIBIT "A"
Page No. 14 of 18
Case No. DIR-2013-881-SPR

UNDERGROUND SERVICE ALERT
1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

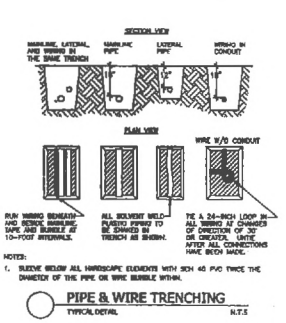
REVISIONS	BY
05-27-15	
7/27/2016	MT

PHIL MAY LANDSCAPE ARCHITECT
1107 West 9th Street
Upland, CA 91786
Phone: 909 373 1856
Fax: 909 373 1956

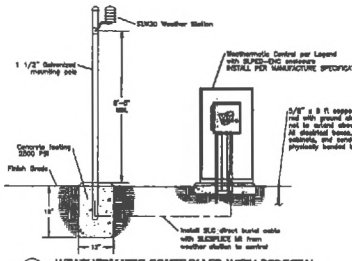
IRRIGATION PLAN

COMMERCIAL BUILDING #3
4061 ALAMEDA ST
LOS ANGELES, CA

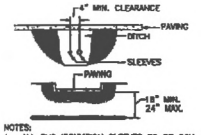
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CHECKED: P.M.
DATE: 12/29/14
SCALE: 1" = 20'
JOB NO: 14118
SHEET: L-2
OF 3 SHEETS



PIPE & WIRE TRENCHING
TYPICAL DETAIL N.T.S



WEATHERMATIC CONTROLLER WITH PEDESTAL
N.T.S



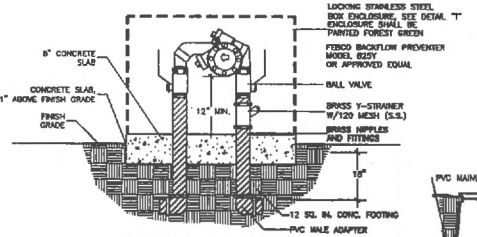
NOTES:
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

SLEEVES
N.T.S

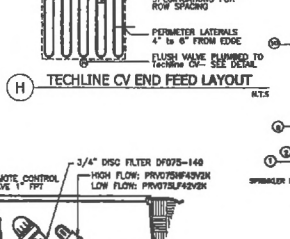
IRRIGATION LEGEND

SYMBOL	MFG	MODEL / DESCRIPTION	PATTERN	GPM	PSI	RADIUS	KEY
	HUNTER	FLUSH VALVE 3/4" VALVE SIZE MODEL # SUBMITTAL					C
	RAINBIRD	3/4" SWING COUPLER-33DRC					E
	WEATHERMATIC	SLICE SMART LINE FEDERAL NO-LINE, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLICE WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	AMI APPROVED	PVC SCHEDULE 40 SLEEVING PVC UNLESS THICK WALL RATED					G
	AMI APPROVED	PVC SCHEDULE 40 LATERAL LINE SEE AS INDICATED ON PLAN					
	AMI APPROVED	PVC SCHEDULE 40 MAIN LINE SEE AS INDICATED ON PLAN					
	MTAFM	150% MI DV, SLICE-VLV UNIT LATCH 6 MP O.C.					H
	MTAFM	CONTROL ZONE KIT, SLICE-WP-6 HPLR, OVERHEAD 6-STA 6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTI-SIPHON DEVICE-LINE SIZE					L

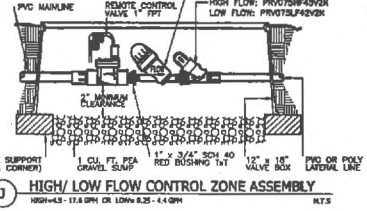
VALVE NUMBER | GPM | VALVE SIZE



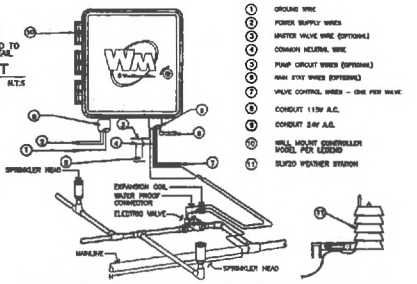
BACKFLOW PREVENTER
N.T.S



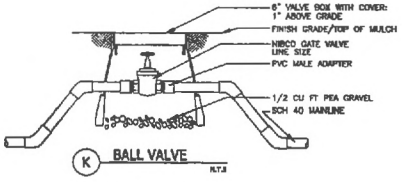
TECHLINE CV END FEED LAYOUT
N.T.S



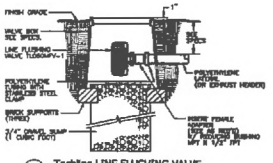
HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY
HIGH=4.5 - 17.6 GPM OR LOW= 2.25 - 4.4 GPM
N.T.S



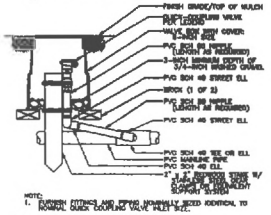
WEATHERMATIC SMART LINE SERIES CONTROLLER
N.T.S



BALL VALVE
N.T.S

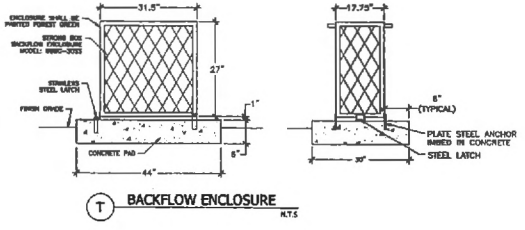


Techline LINE FLUSHING VALVE
(FLUSHED TO POLY)
N.T.S



NOTE:
1. FURNISH FITTINGS AND PIPE APPROXIMATELY SIZED IDENTICAL TO MANUAL QUICK COUPLER VALVE INLET SIZE.

QUICK COUPLING VALVE
N.T.S



BACKFLOW ENCLOSURE
N.T.S



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Page No. 15 of 18
Case No. DIR-2013-881-SPR

REVISIONS	BY
05-27-15	
3/27/2016	MT

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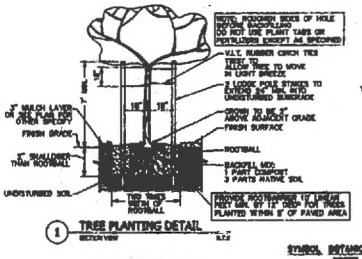
IRRIGATION DETAILS PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

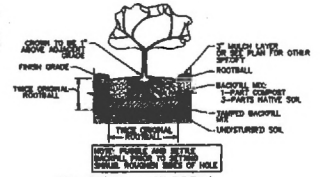
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CHECKED: P.M.
DATE: 12/23/14
SCALE: 1" = 20'
JOB NO.: 14116
SHEET: L-3
OF 3 SHEETS

PLANTING NOTES

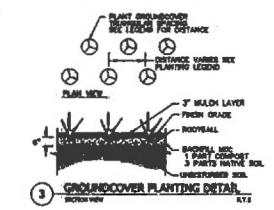
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any and incorrect data in discrepancy of quantities written. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall take priority over quantity designations. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any substantial field changes or modifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all unauthorized modifications due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of planting work.
3. The Contractor shall review site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be submitted by Contractor or checked by Owner's representative. All grading shall be completed prior to commencement of planting operations.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and related groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated in place by means of a rototiller or equal:
   Amend per 1,000 square feet:
   5 cubic yards of Organic compost
   10 pounds of Gypsum
   10 pounds of Iron sulfate
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be six sides (or, used from bottom) slightness deep. The rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-inch-and three as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and weeding, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall promptly and replace any plant material that shows signs of lack of vigor or other unsatisfactory appearance within ninety (90) days of completion of planting. Those that have been injured or otherwise improperly planted by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S



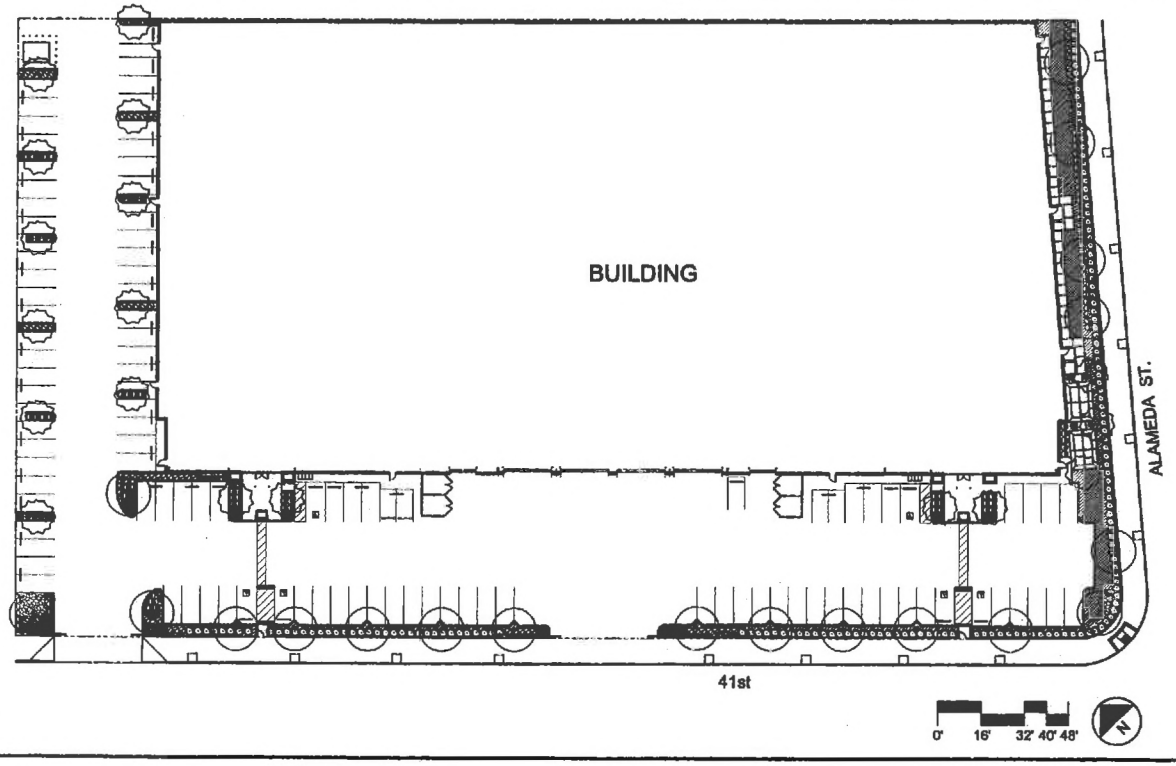
3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.

PLANT LEGEND

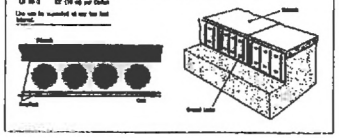
SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagerstroemia indica	Crape Myrtle	24" box	17	M	
	Platanus x acerifolia 'Bloodgood'	London Plane Tree	24" box	2	M	
	Lophostemon confertus	Brisbane box	24" box	18	M	
	SHRUB					
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	157	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	43	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	13	M	
	Rosa hybrida	Hybrid Tea Rose	5 gal	24	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	88	M	
	Hemerocallis hybrida	Daylily	1 gal	88	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	Flat	32	M	plant @ 12" O.C.

EXHIBIT "A"
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Case No. DIR-2013-887-SPR



Linear Style Planting with DeepRoot Barriers

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY



REVISIONS | BY

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Fax: 909 373 1988

PLANTING PLAN

COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

PLM
11/14/14
1" = 20'
14104

L-1

IRRIGATION NOTES

1. It is the responsibility of the Irrigation Contractor to familiarize himself with all grade differences, location of soil, existing work, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unforeseen obstructions, grade differences or differences in the size dimension exist that might not have been considered in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the owner's authorized representative in the event that such notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any overwatering into adjacent property, R.O.W.'s easements outlands or any other legal property restrictions either stated or unstated.

5. The irrigation system design is based on a minimum operating pressure of 45 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1-1/2" in diameter and larger. Where roots 1-1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been wounded under shall be cropped to sound tissue and kept moist until the tunnel is open.

8. All mains in piping beyond the piping and control area under paving shall be installed in Schedule 40 PVC pipeline at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sizes shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Plan views shall conform to these shown on the drawings. No substitutions of smaller plan sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop-up heads.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal wetting and/or over spray onto walks, streets, walls, etc. Installation of nozzle caps or valves as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 12" apart on top the finish grade and covered with 2" of specified mulch/soil - see planting plan. Further spacing of adjacent rows changeable. Tubing shall be firmly staked in place with U-shaped at 3' on center (3') on center around tight corners). In planter adjacent areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the elevation's higher high points (as indicated on plans). Install flush valves and relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be brown, color, or approved equal, and shall be marked "RAIN" for gate valves, "RCVA" for remote control valves, etc. Provide information as to each valve destination in valve box as per details.

15. Install all irrigation preparatory systems and all piping between the point of connection and the irrigation controller as per local codes. Final location of the backflow prevention unit underneath controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per three(3) hours constant.

Point of Connection # 1

	Qty.	Size	L.A.	Connection	Pressure	Gallons Per Minute
Maximum Water Using Group	19.0	4.00	4.50'	4.00	4.00	19.00
Total Static =			4.50'			19.00 GPM Total Flow

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88

IRRIGATION LEGEND

SYMBOL	MFR	MODEL / DESCRIPTION	PSI	GPM	RADIUS	QTY
	HUNTER	FLUSH VALVE IN 6" VALVE BOX MODEL # FLOWCONTROL-1				C
	RAINBIRD	3/4" QUICK COUPLER--33DRC				E
	MAINTENANCE	6,000 SHARTLINE PEDESTAL 400LBF, VERIFY LOCATION W/ OWNER				F
	MAINTENANCE	6,000 VERTICAL SWITCH MOUNT TO POLE, BOX GROUP, SPICES.				F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVES (W/ LIGHT TYPE LINE SIZE)				S
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN				
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN				
	HUNTER	TROUBLE CH. ELEVEN-12 LINES LARGER 0' 16" S.C.	45PSI	20		M
	HUNTER	CONTROL ZONE CAESER-SERIES-HP, FLOW RATE 2.0--17.0 GPM				J
	HSCO	BALL VALVE-LINE SIZE				K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE-- LINE SIZE				L

VALVE NUMBER | GPM | VALVE SIZE

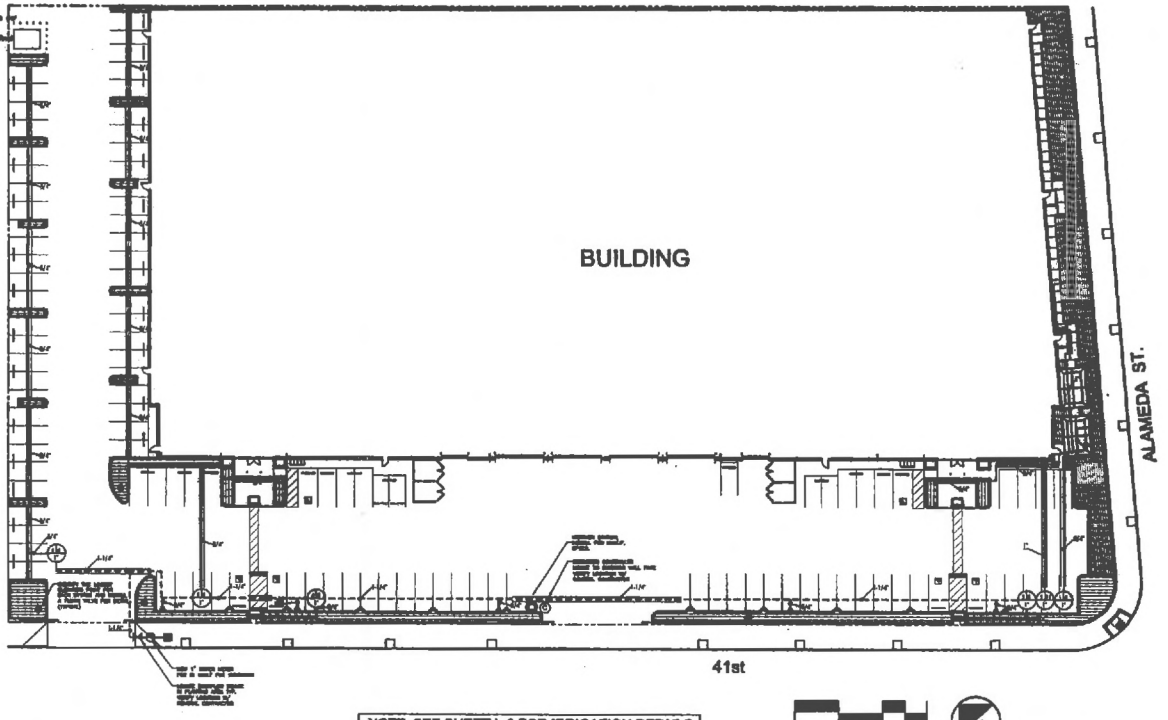


EXHIBIT "A"
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Case No. DIR2013-887-SPR

REVISIONS BY

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Fax: 909 373 1988

IRRIGATION PLAN

COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

DRAWN P.M.
CHECKED P.M.
DATE 11/14/13
SCALE 1" = 20'
JOB NO. 14184
SHEET L-2
OF 3

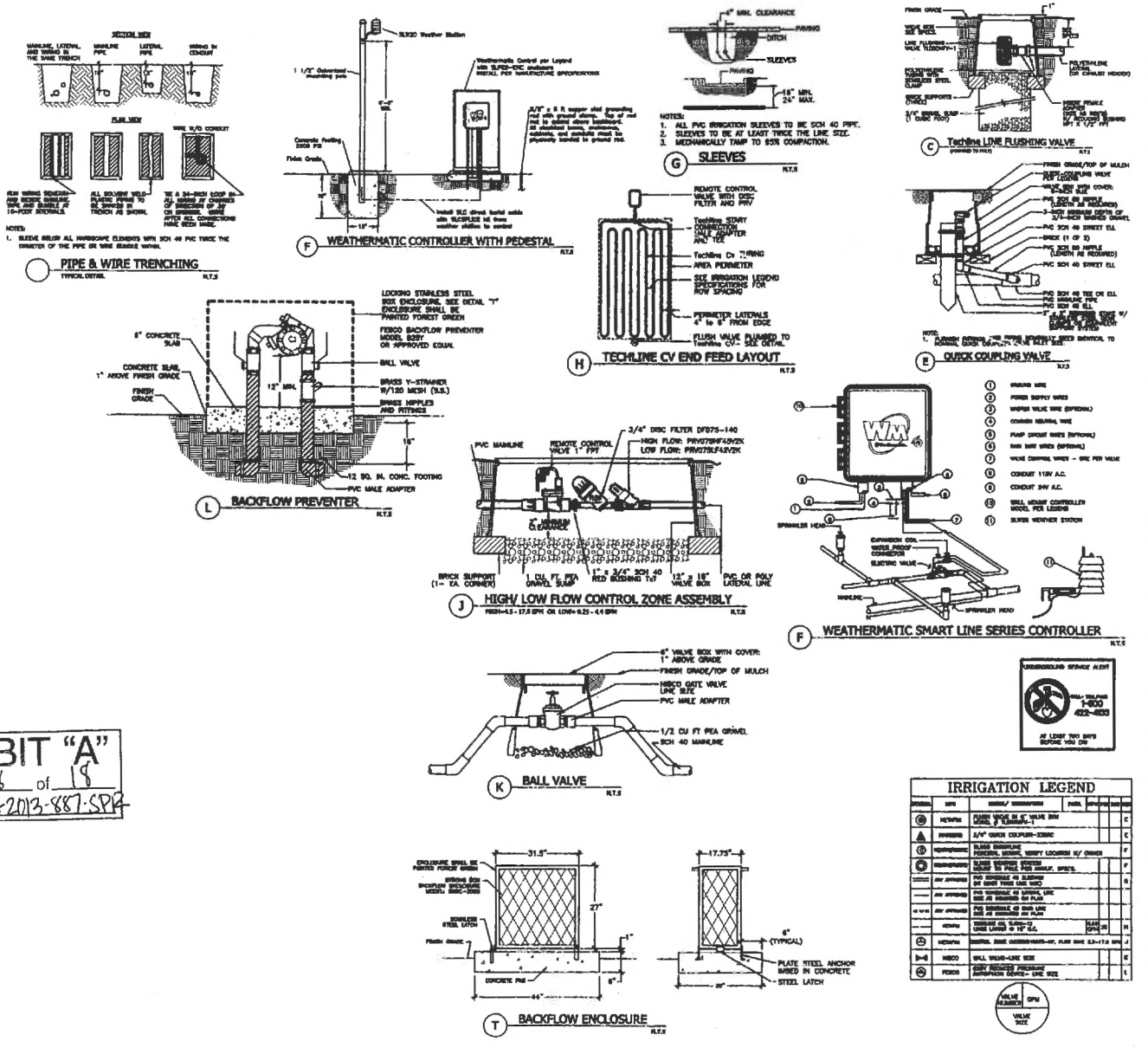


EXHIBIT "A"
Page No. 18 of 18
Case No. DIR-2013-887-SPR

REVISIONS | BY

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Fax: 909 373 1958

IRRIGATION DETAILS PLAN

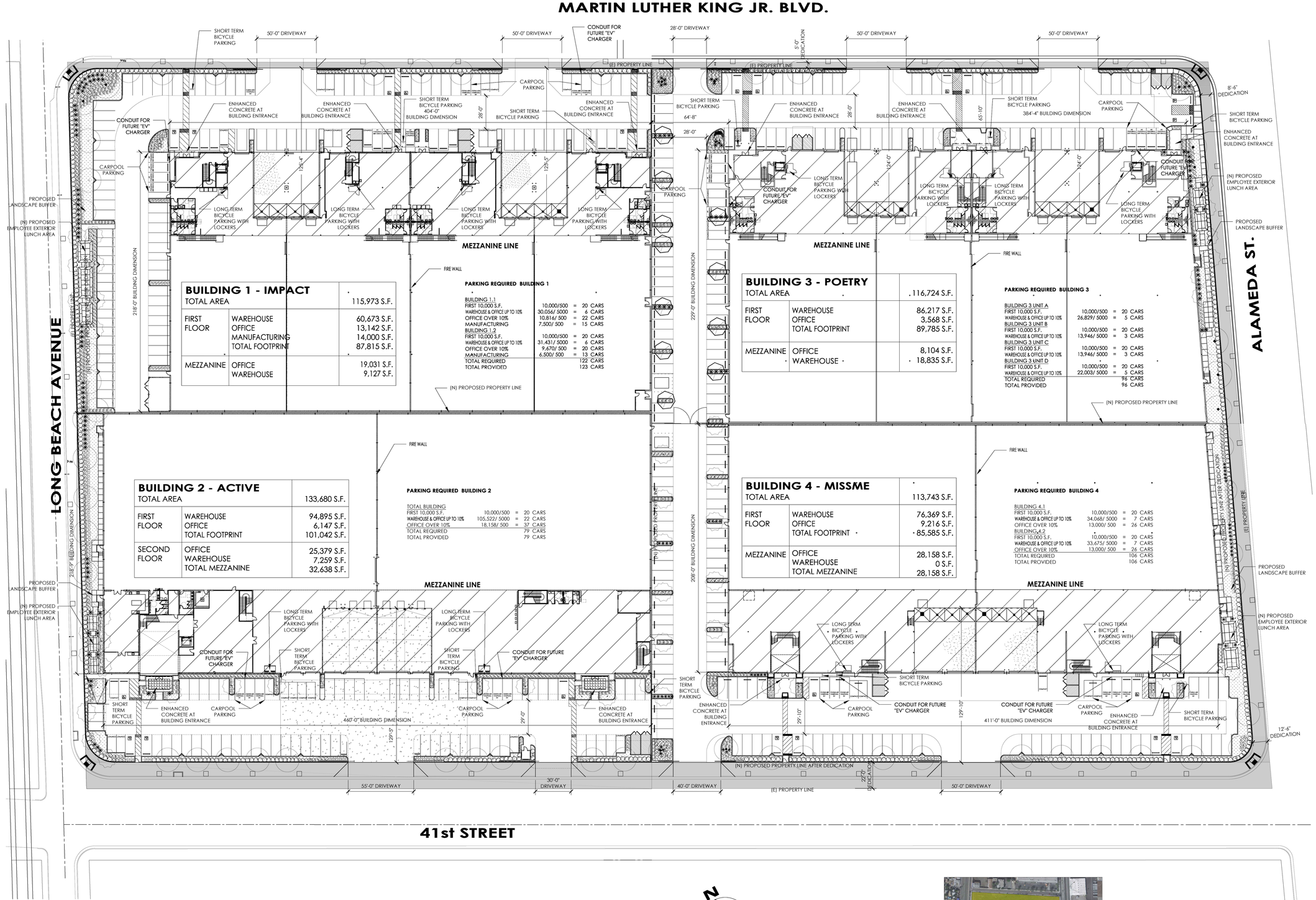
COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

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CHECKED: P.M.
DATE: 11/16/14
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JOB NO.: 14104
SHEET: L-3
OF 3 SHEETS

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



BUILDING 1 - IMPACT

TOTAL AREA		115,973 S.F.
FIRST FLOOR	WAREHOUSE	60,673 S.F.
	OFFICE	13,142 S.F.
	MANUFACTURING	14,000 S.F.
	TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE	OFFICE	19,031 S.F.
	WAREHOUSE	9,127 S.F.

PARKING REQUIRED BUILDING 1

BUILDING 1.1			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	30,056/ 5000	=	6 CARS
OFFICE OVER 10%	10,816/ 500	=	22 CARS
MANUFACTURING	7,500/ 500	=	15 CARS
BUILDING 1.2			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	31,431/ 5000	=	6 CARS
OFFICE OVER 10%	9,670/ 500	=	20 CARS
MANUFACTURING	6,500/ 500	=	13 CARS
TOTAL REQUIRED			122 CARS
TOTAL PROVIDED			123 CARS

BUILDING 2 - ACTIVE

TOTAL AREA		133,680 S.F.
FIRST FLOOR	WAREHOUSE	94,895 S.F.
	OFFICE	6,147 S.F.
	TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR	OFFICE	25,379 S.F.
	WAREHOUSE	7,259 S.F.
	TOTAL MEZZANINE	32,638 S.F.

PARKING REQUIRED BUILDING 2

TOTAL BUILDING			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	105,522/ 5000	=	22 CARS
OFFICE OVER 10%	18,158/ 500	=	37 CARS
TOTAL REQUIRED			79 CARS
TOTAL PROVIDED			79 CARS

BUILDING 3 - POETRY

TOTAL AREA		116,724 S.F.
FIRST FLOOR	WAREHOUSE	86,217 S.F.
	OFFICE	3,568 S.F.
	TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE	OFFICE	8,104 S.F.
	WAREHOUSE	18,835 S.F.

PARKING REQUIRED BUILDING 3

BUILDING 3 UNIT A			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	26,829/ 5000	=	5 CARS
BUILDING 3 UNIT B			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	13,946/ 5000	=	3 CARS
BUILDING 3 UNIT C			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	13,946/ 5000	=	3 CARS
BUILDING 3 UNIT D			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	22,003/ 5000	=	5 CARS
TOTAL REQUIRED			96 CARS
TOTAL PROVIDED			96 CARS

BUILDING 4 - MISSME

TOTAL AREA		113,743 S.F.
FIRST FLOOR	WAREHOUSE	76,369 S.F.
	OFFICE	9,216 S.F.
	TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE	OFFICE	28,158 S.F.
	WAREHOUSE	0 S.F.
	TOTAL MEZZANINE	28,158 S.F.

PARKING REQUIRED BUILDING 4

BUILDING 4.1			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	34,068/ 5000	=	7 CARS
OFFICE OVER 10%	13,000/ 500	=	26 CARS
BUILDING 4.2			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	33,675/ 5000	=	7 CARS
OFFICE OVER 10%	13,000/ 500	=	26 CARS
TOTAL REQUIRED			106 CARS
TOTAL PROVIDED			106 CARS

SITE PLAN

SCALE 1/32" = 1'-0"



VICINITY MAP

NOT TO SCALE

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EXHIBIT 3

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROU
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
FAX (562) 948-1735

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

SITE ANALYSIS

CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY
SUBJECT TO SITE PLAN REVIEW TO CITY OF LOS ANGELES

DESCRIPTION	AREAS
ZONING	M 2 (HEAVY MANUF.)
LEGAL DESCRIPTION	E. JEFFERSON ST. TRACT #1 EX OF ST LOT 173 & ALL LOTS 165 THRU 172, E. JEFFERSON ST. TRACT #1 EX OF ST LOT 106 & ALL LOTS 107 THRU 115
ASSESSOR'S PARCEL NO:	5117-021-020 5117-021-023
BUILDING CODE	CBC 2010
BLDG. OCCUPANCY	B S-1, F-1
BUILDING TYPE	III-B, FULLY SPRINKLERED
LAND AREA : (PARCEL AREA)	562,314 S.F. (12.90 AC)
COVERAGE :	85%
ALLOWABLE AREA	100%
TOTAL AREA	**480,120 S.F.**
BUILDING 1 - IMPACT TOTAL AREA	115,973 S.F.
FIRST FLOOR — WAREHOUSE	60,673 S.F.
OFFICE	13,142 S.F.
MANUFACTURING	14,000 S.F.
TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE — OFFICE	19,031 S.F.
WAREHOUSE	9,127 S.F.
BUILDING 2 - ACTIVE TOTAL AREA	133,680 S.F.
FIRST FLOOR — WAREHOUSE	94,895 S.F.
OFFICE	6,147 S.F.
TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR — OFFICE	25,379 S.F.
WAREHOUSE	7,259 S.F.
TOTAL MEZZANINE	32,638 S.F.
BUILDING 3 - POETRY TOTAL AREA	116,724 S.F.
FIRST FLOOR — WAREHOUSE	86,217 S.F.
OFFICE	3,568 S.F.
TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE — OFFICE	8,104 S.F.
WAREHOUSE	18,835 S.F.
BUILDING 4 - MISSME TOTAL AREA	113,743 S.F.
FIRST FLOOR — WAREHOUSE	76,369 S.F.
OFFICE	9,216 S.F.
TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE — OFFICE	28,158 S.F.
WAREHOUSE	0 S.F.
TOTAL MEZZANINE	28,158 S.F.
TRASH ENCL. AREA PROVIDED	480 S.F.
LANDSCAPING PROVIDED	
BUILDING 1	8,261 S.F.
BUILDING 2	7,026 S.F.
BUILDING 3	7,778 S.F.
BUILDING 4	7,409 S.F.
TOTAL = 14.6% OF THE PARKING AREA AND 5.4% OF THE PARCEL	**30,474 S.F.**
+ 1 TREE PER EA 4 STALLS	

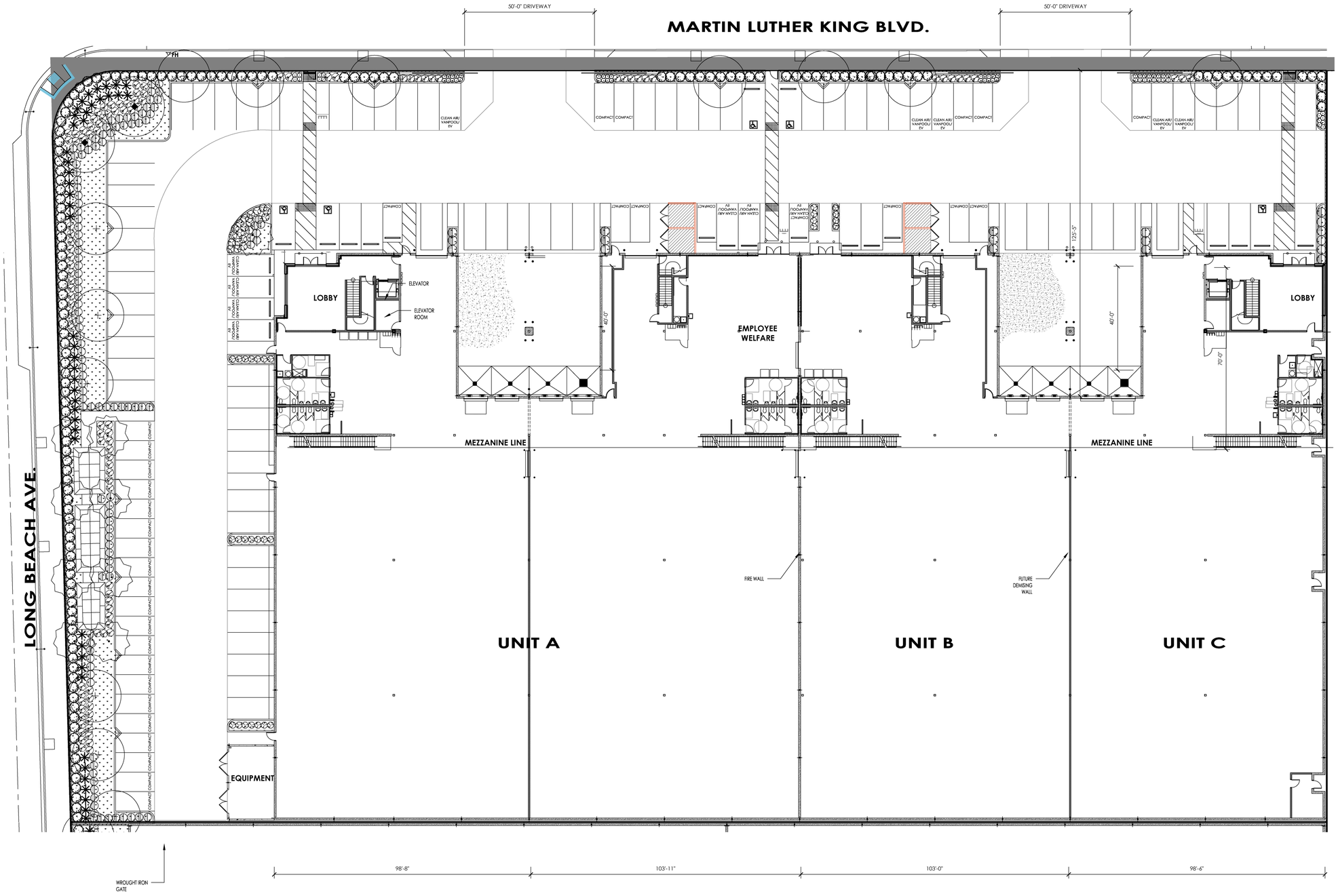
SITE PLAN

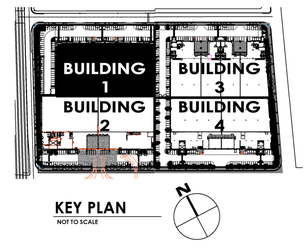
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ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA





BUILDING 1 - IMPACT		
TOTAL AREA		115,973 S.F.
FIRST FLOOR	WAREHOUSE	60,673 S.F.
	OFFICE	13,142 S.F.
	MANUFACTURING	14,000 S.F.
	TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE	OFFICE	19,031 S.F.

BUILDING 1 - FIRST FLOOR PLAN

SCALE 1/16" = 1'-0"

N

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROU
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
FAX (562) 948-1735

GENERAL CONTRACTOR:
C.E.G. CONSTRUCTION
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

DESIGN:
O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

FLOOR PLAN BUILDING 1

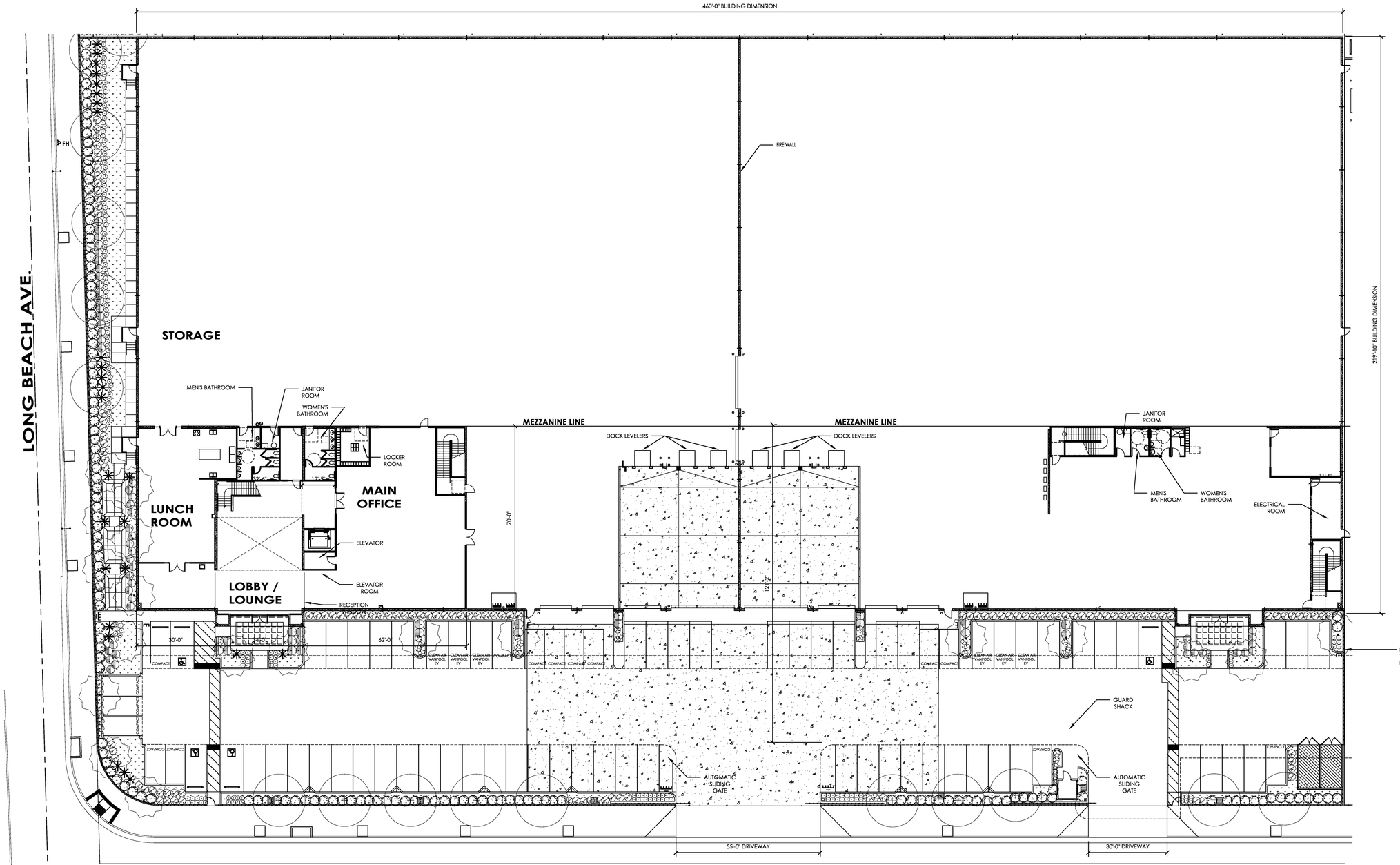
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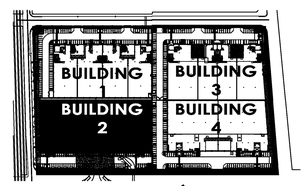
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ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA





KEY PLAN
NOT TO SCALE

	WAREHOUSE	9,127 S.F.
BUILDING 2 - ACTIVE TOTAL AREA		133,680 S.F.
FIRST FLOOR	WAREHOUSE	94,895 S.F.
	OFFICE	6,147 S.F.
	TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR	OFFICE	25,379 S.F.
	WAREHOUSE	7,259 S.F.

PARKING REQUIRED BUILDING 2

TOTAL BUILDING			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	105,522/ 5000	=	22 CARS
OFFICE OVER 10%	18,158/ 500	=	37 CARS
TOTAL REQUIRED			79 CARS
TOTAL PROVIDED			79 CARS

BUILDING 2- FIRST FLOOR PLAN

SCALE 1/16" = 1'-0"

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:
CHALMERS EQUITY GROUP
7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
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GENERAL CONTRACTOR:
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DESIGN:
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TEL (562)942-9804 FAX (562)948-1735

FLOOR PLAN BUILDING 2

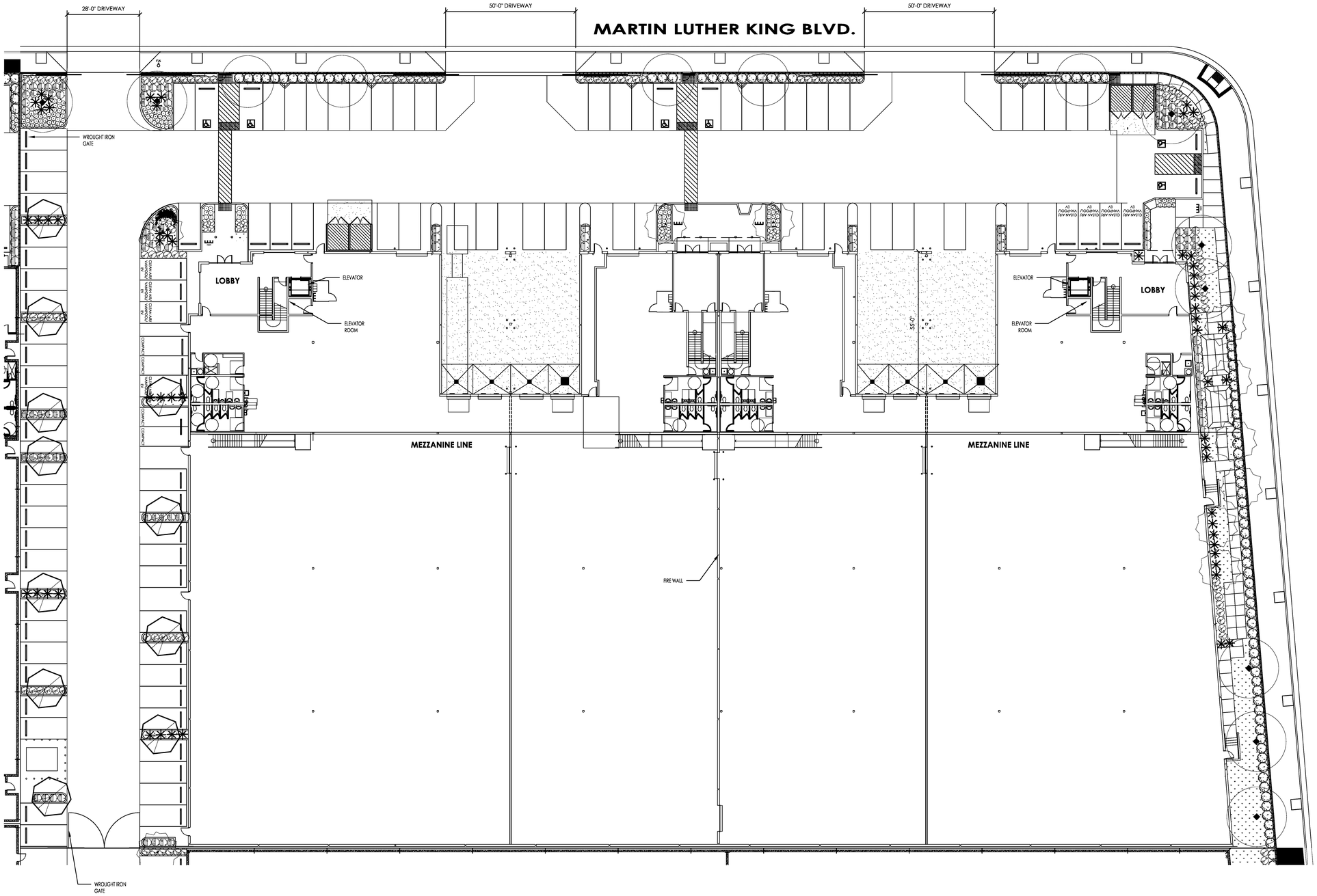
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ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA

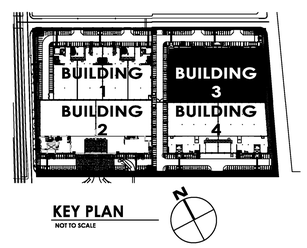


ALAMEDA ST.

TOTAL AREA		116,724 S.F.
FIRST FLOOR	WAREHOUSE	86,217 S.F.
	OFFICE	3,568 S.F.
	TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE	OFFICE	8,104 S.F.
	WAREHOUSE	18,835 S.F.

BUILDING 3- FIRST FLOOR PLAN

SCALE 1/16" = 1'-0"



KEY PLAN

NOT TO SCALE

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:

CHALMERS EQUITY GROUP

7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
FAX (562) 948-1735

GENERAL CONTRACTOR:

C.E.G. CONSTRUCTION

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TEL (562)942-9804 FAX (562)948-1735

DESIGN:

O.C. DESIGN & ENGINEERING

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TEL (562)942-9804 FAX (562)948-1735

FLOOR PLAN BUILDING 3

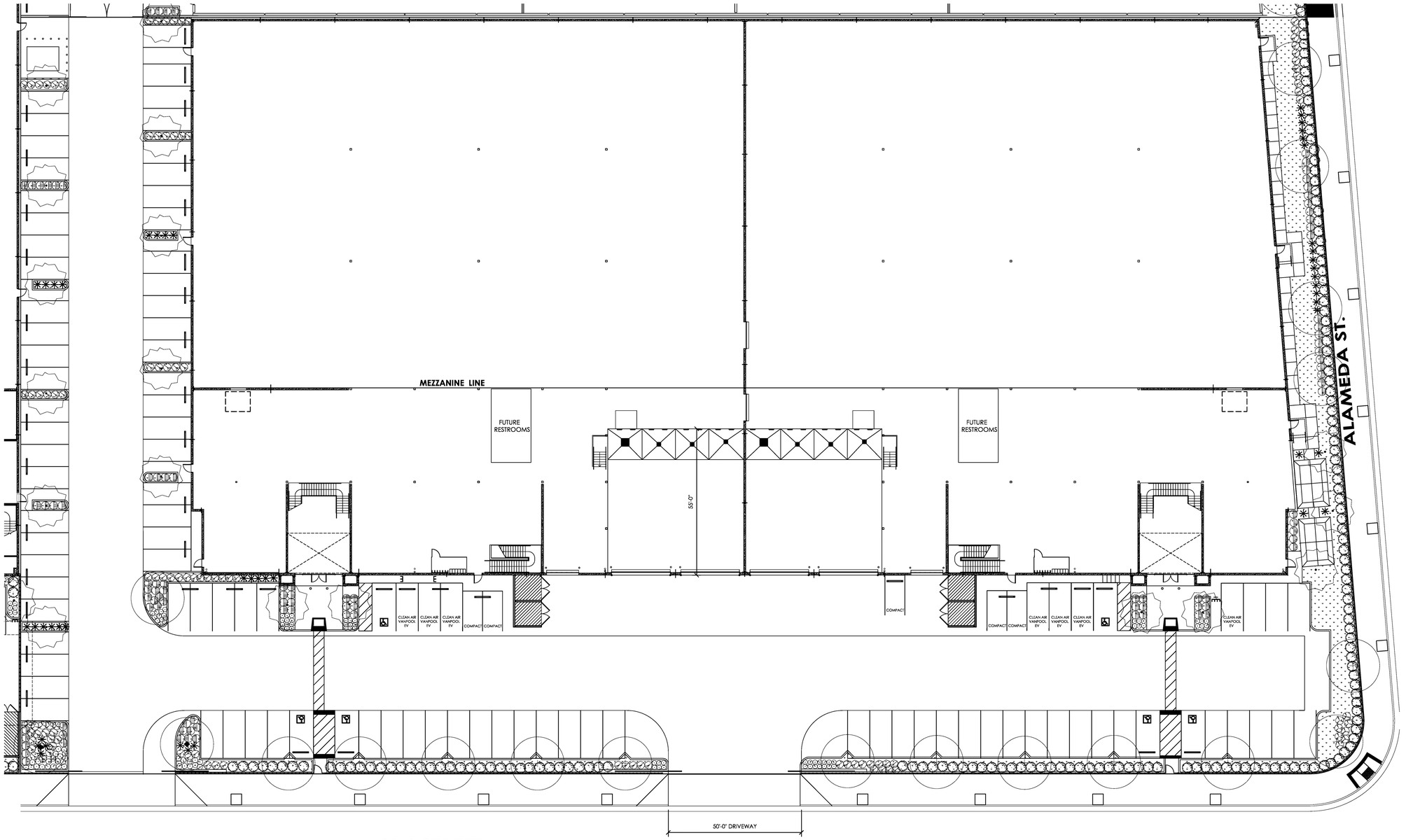
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ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



41st STREET

BUILDING 4 - MISSME		
TOTAL AREA		113,743 S.F.
FIRST FLOOR	WAREHOUSE	76,369 S.F.
	OFFICE	9,216 S.F.
	TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE	OFFICE	28,158 S.F.
	WAREHOUSE	

BUILDING 4- FIRST FLOOR PLAN

SCALE 1/16" = 1'-0"

ADDRESS:
4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:

CHALMERS EQUITY GROUP

7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
FAX (562) 948-1735

GENERAL CONTRACTOR:

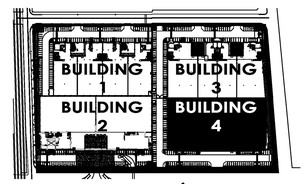
C.E.G. CONSTRUCTION

7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

DESIGN:

O.C. DESIGN & ENGINEERING

7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735



KEY PLAN
NOT TO SCALE

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FLOOR PLAN BUILDING 4

A-2D

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



NORTH ELEVATION BUILDING 1

1700 MARTIN LUTHER KING



SOUTH ELEVATION BUILDING 2

1701 41st STREET



NORTH ELEVATION BUILDING 3

1800 MARTIN LUTHER KING



SOUTH ELEVATION BUILDING 4

1801 1st STREET

ADDRESS:

4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:

CHALMERS EQUITY GROU

7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
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GENERAL CONTRACTOR:

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TEL (562)942-9804 FAX (562)948-1735

DESIGN:

O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

ELEVATIONS

A-3

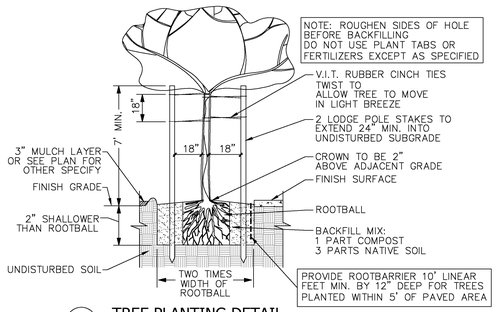
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PLANTING NOTES

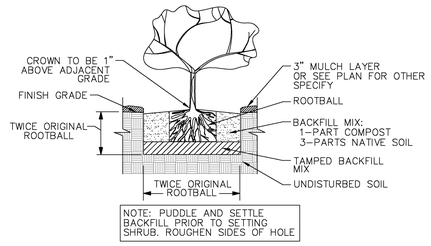
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and flatted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.

   Amount per 1000 square feet
   4 cu. yds. nitrogen stabilized organic compost
   50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

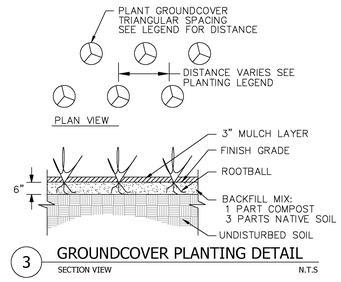
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



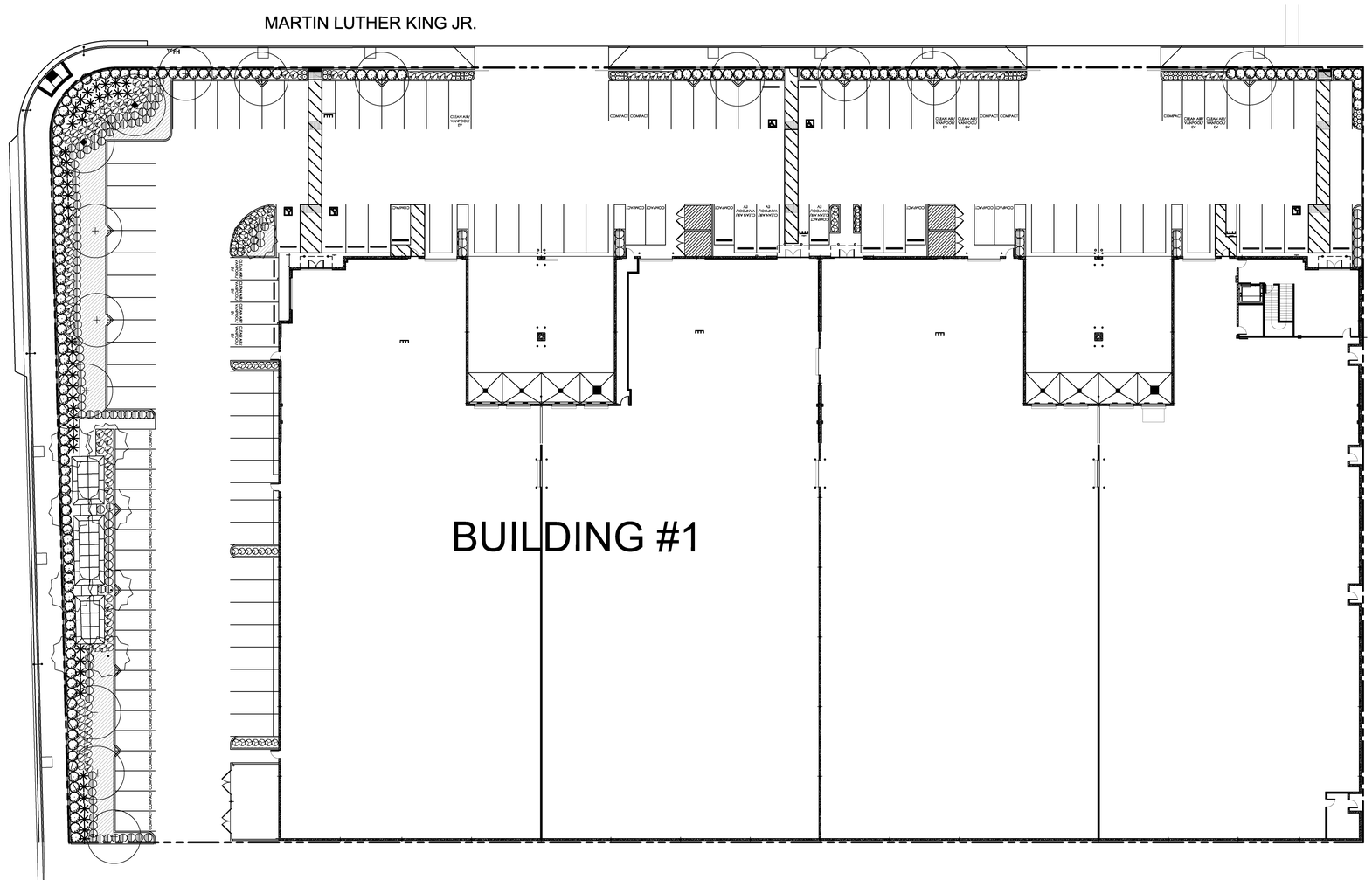
2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagestroemia indica	Crape Myrtle	36" box	2	M	multi trunk
	Lagestroemia indica	Crape Myrtle	24" box	9	M	
	Lophostemon confertus	Brisbane box	24" box	13	M	
	SHRUB					
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	146	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	46	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	47	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	133	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	107	M	
	Hemerocallis hybrids	Daylily	1 gal	59	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	flats	44	M	plant @ 12" o.c.



UNDERGROUND SERVICE ALERT
DON'T DIG FOR 2 DAYS
CALL: TOLL FREE 1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the actual planting plan and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 2 feet (61cm). This will be the number of feet necessary for a Linear style planting application. (See chart below.)

A. Dig the trench to the depth based upon the particular barrier chosen.

B. Install the barrier. When using DeepRoot Linear Barriers simply pull the appropriate number of panels out of the box (they come preassembled) and separate the joiner at the correct length. When installing DeepRoot Universal Barriers in a linear fashion you will need to join the appropriate number of panels together.

C. Next place the barrier in the trench with the vertical ribs facing toward the tree and align in a straight fashion. It is helpful to place the barrier against the hardscape. Use the hardscape as a guide and backfill against the barriers to promote a clean smooth fit to the hardscape. Be sure to keep the barrier's double top edge at least 1/2" (13mm) above grade to ensure roots do not grow over the top.

D. Plant the tree(s). The Linear style offers a more expansive rooting growth area, however adverse soil and drainage conditions may exist in the actual planting area. Take steps to ensure healthy growth of the tree at planting. Consult with a local Arborist for planting tips and recommendations.

E. If the tree(s) will be subject to maintenance work such as lawn mowing or weed trimming we strongly recommend the installation of ArborGard+ Tree Trunk Protectors which is placed around the base of young trees to protect them from damage by weed trimmers, lawn mowers and small rodents.

For additional information please consult the 16 page DeepRoot Product Selection and Installation Guidelines.

For information regarding distributors please call: 1 800 ILV ROOT (458.7668). For help with difficult drainage or other difficult installation questions please call DeepRoot Technical Support at: 1 800 ROOT TEK (766.8835).

For a simple formula to determine the quantity of panels required for a Linear application use:

Estimated Diameter of the Tree Canopy at Maturity + 2' (61cm) = Length of Barrier per Side.

As little as one side of the tree may need barrier for root direction as there may be no hardscape elsewhere requiring protection.

Note: Linear Barriers (LB 12-2 and LB 18-2) are packaged in 2' (61cm) long panels with pre-attached flexible joiners ready to pull out of the carton and install in one continuous line of up to:

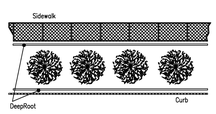
LB 12-2	80' (24 m) per Carton
LB 18-2	52' (16 m) per Carton

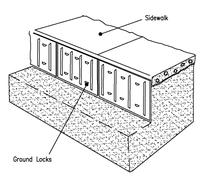
Line can be separated at any two foot interval.

For One Side of Tree

Expected Tree Canopy at Maturity		Number of Feet of Linear Barrier (LB 12 or LB 18)	Optional Universal Barrier (UB) in number of Panels
12' (3.6m) Diameter	+2' (61cm) =	14' (4.2m)	7 Panels
18' (5.5m) Diameter	+2' (61cm) =	20' (6.1m)	10 Panels
24' (7.3m) Diameter	+2' (61cm) =	26' (7.9m)	13 Panels

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





REVISIONS	BY
05-27-2015	
03-28-2016	

PHIL MAY LANDSCAPE ARCHITECT
1937 West 9th Street
Upland, CA 91786
Phone: 909 373 1959
Fax: 909 373 1958
pmay@philmaydesign.com
www.philmaydesign.com

REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY, JR. EXPIRATION 05-31-17 RENEWAL DATE 03-28-2016 DATE STATE OF CALIFORNIA

PLANTING PLAN

COMMERCIAL BUILDING #1
1700 MARTIN LUTHER KING
LOS ANGELES, CA 90058

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO.	14116
SHEET	L-1

OF 3 SHEETS

IRRIGATION NOTES

1. It is the responsibility of the irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.
2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative. In the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.
3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.
4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.
5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.
6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.
7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1–1/2" in diameter and larger. Where roots 1–1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.
8. All main in piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sized shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.
9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.
10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop–up bodies.
11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.
12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.
13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material– see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U–staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.
14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtec, or approved equal, and shall be marked "G.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.
15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.
16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.
17. Pressure test Mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TLCL50MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCH. 40 SLEEVING–PROVIDE WHERE REQUIRED (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ58010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

NOTES: CONTRACTOR TO PROVIDE IRRIGATION SLEEVING WHERE REQUIRED

VALVE NUMBER / GPM / VALVE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo x 0.7 x LA in Sq. Ft. x 0.62) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration **Appendix C** (inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
1.0 = ETAF for Special Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ETo		ETAF		LA or SLA (ft2)		Conversion		MAWA (Gallons Per Year)
MAWA for LA=	50.1	x	0.7	x	7,211	x	0.62	=	156,791.00
Total MAWA =					7,211				156,791.00 Gal./ Year

Estimated Applied Water Use
EAWU = ETo x K_L x LA x 0.62 ÷ IE = Gallons per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration Appendix C (inches per year)
KL = Landscape Coefficient
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
IE = Irrigation Efficiency = IME x DU (See definition in Appendix E for example IE percentages)

IME = Irrigation Management Efficiency (90%)
DU = Distribution Uniformity of irrigation head

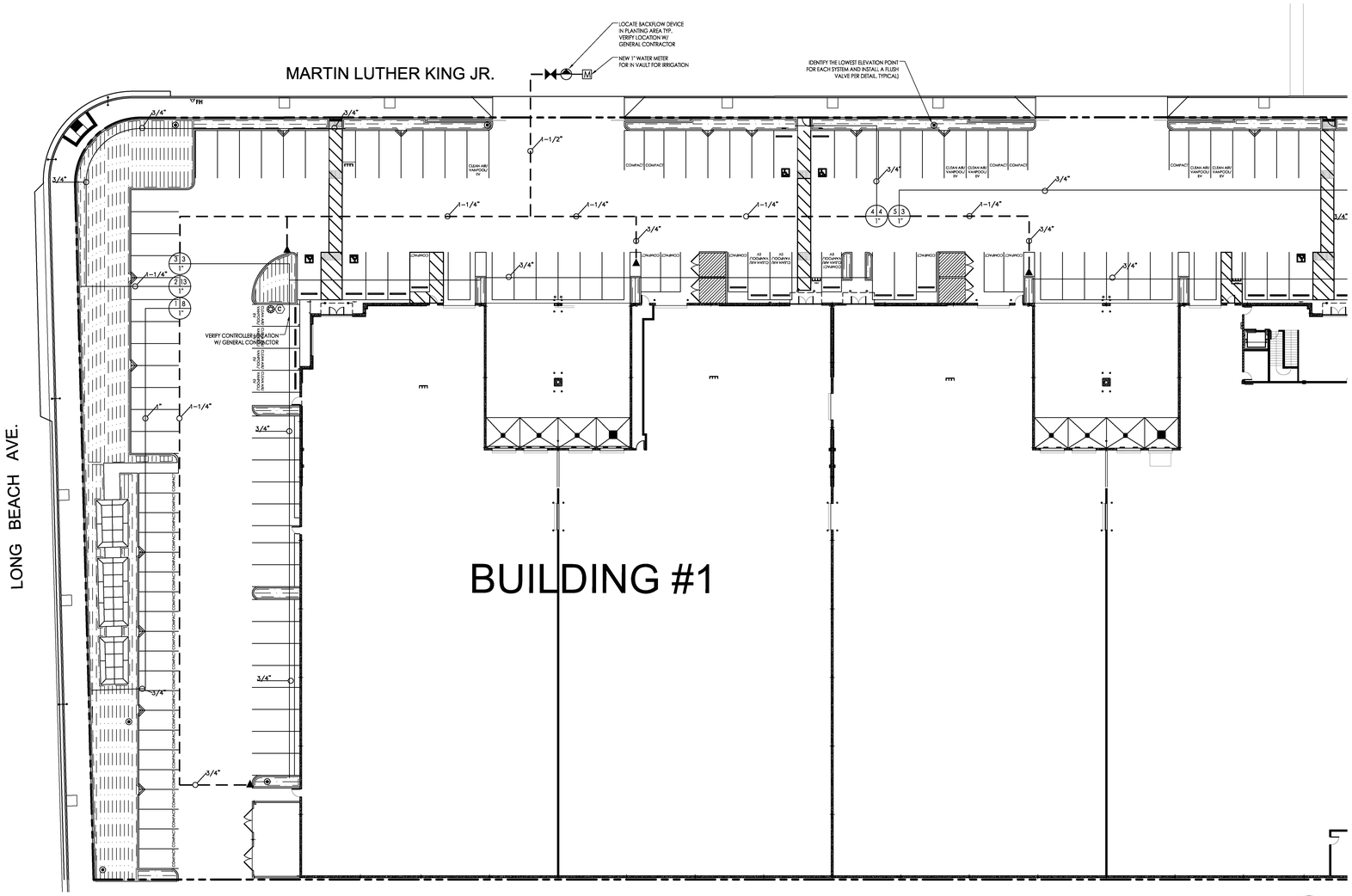
KL = Ks x Kd x Kmc
Ks = species factor (range = 0.1-0.9) (see WUCOLS list for values)
Kd = density factor (range = 0.5-1.3) (see WUCOLS for density value ranges)
Kmc = microclimate factor (range = 0.5-1.4) (see WUCOLS)

EAWU Calculation

	ETo		K_L		LA		Conversion		IE		EAWU (Gallons per year)
Medium Water Using Shrub	50.1	x	0.50	x	7,211	x	0.62	÷	0.90	=	124,437.00
Total EAWU =					7,211						124,437.00 Gal / Year

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

0' 20' 40' 50' 60'

N

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CALL: TOLL FREE 1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-2015	
03-28-2016	

PHIL MAY LANDSCAPE ARCHITECT
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pmay@philmaydesign.com
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REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY
EXPIRATION 05-31-17
RENEWAL DATE 03-28-2016
DATE
STATE OF CALIFORNIA

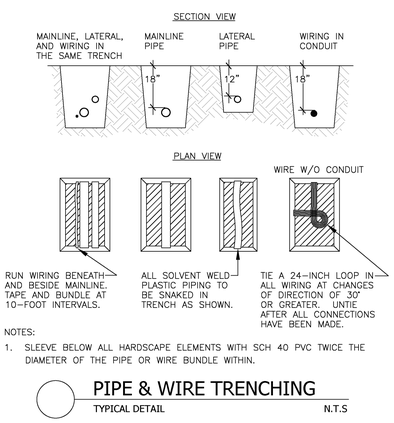
IRRIGATION PLAN

COMMERCIAL BUILDING #1
1700 MARTIN LUTHER KING
LOS ANGELES, CA 90058

DRAWN R.S.
CHECKED P.M.
DATE 12/29/14
SCALE 1" = 20'
JOB NO. 1411G
SHEET

L-2

OF 3 SHEETS

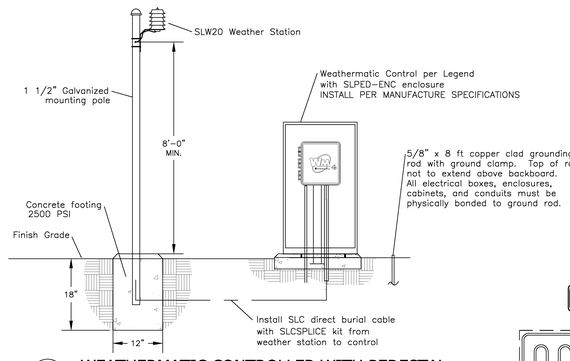


NOTES:

1. SLEEVE BELOW ALL HARDSCAPE ELEMENTS WITH SCH 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.

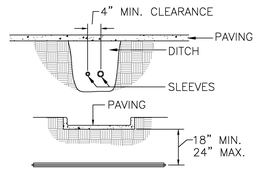
PIPE & WIRE TRENCHING

TYPICAL DETAIL N.T.S



F WEATHERMATIC CONTROLLER WITH PEDESTAL

N.T.S



NOTES:

1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

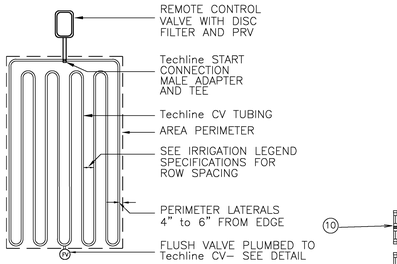
G SLEEVES

N.T.S

IRRIGATION LEGEND

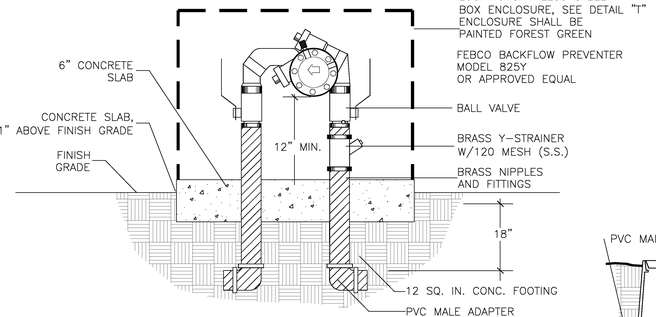
SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCH. 40 SLEEVING-PROVIDE WHERE REQUIRED (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ38010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

NOTES: CONTRACTOR TO PROVIDE IRRIGATION SLEEVING WHERE REQUIRED



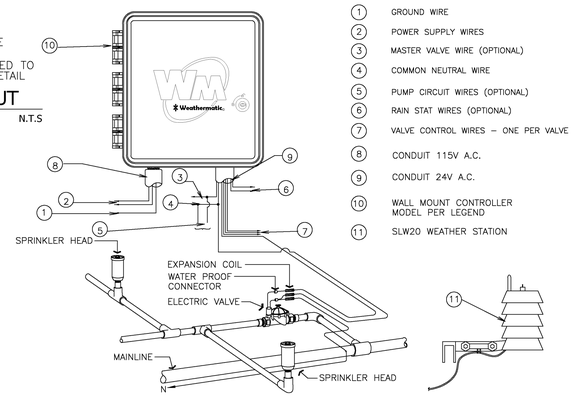
H TECHLINE CV END FEED LAYOUT

N.T.S



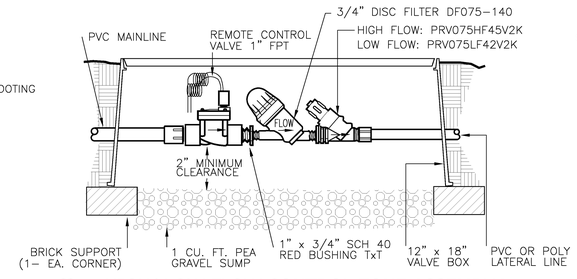
L BACKFLOW PREVENTER

N.T.S



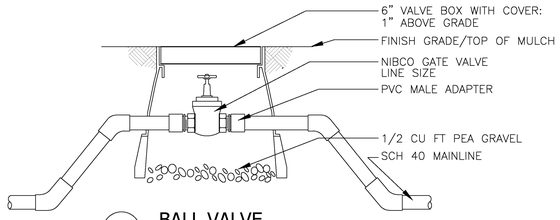
F WEATHERMATIC SMART LINE SERIES CONTROLLER

N.T.S



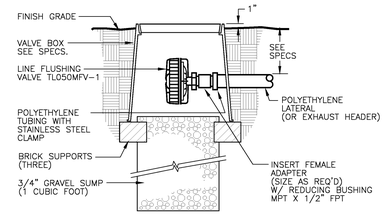
J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY

HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM N.T.S



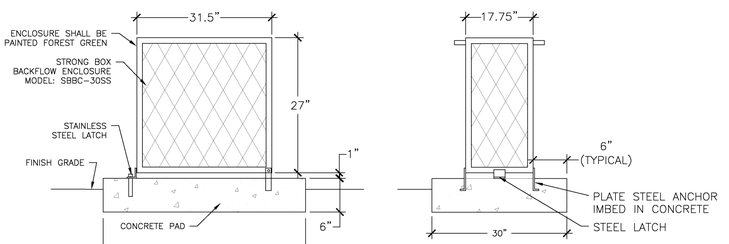
K BALL VALVE

N.T.S



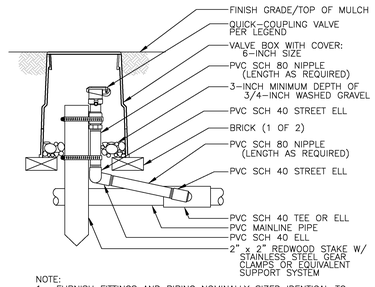
C Techline LINE FLUSHING VALVE

(PLUMBED TO POLY) N.T.S



T BACKFLOW ENCLOSURE

N.T.S



NOTE:
1. FURNISH FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE INLET SIZE.

E QUICK COUPLING VALVE

N.T.S

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1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-2015	
03-28-2016	

PHIL MAY LANDSCAPE ARCHITECT
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REGISTERED LANDSCAPE ARCHITECT — PHILIP C. MAY — 3293 — 05-31-17 RENEWAL DATE — 03-28-2016 DATE — STATE OF CALIFORNIA

IRRIGATION DETAILS PLAN

COMMERCIAL BUILDING #1
1700 MARTIN LUTHER KING
LOS ANGELES, CA 90058

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO.	14116
SHEET	L-3

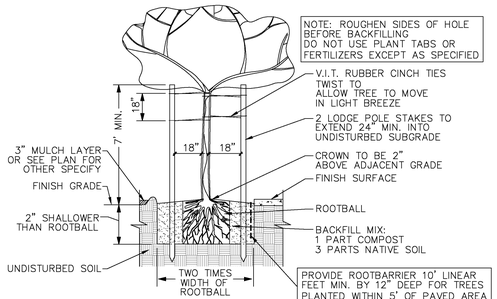
OF 3 SHEETS

PLANTING NOTES

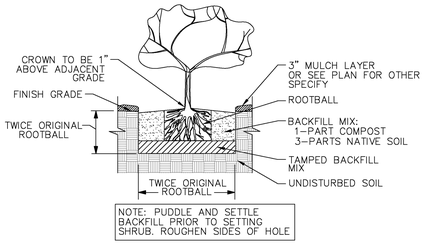
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and flatted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.

   Amount per 1000 square feet
   4 cu. yds. nitrogen stabilized organic compost
   50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

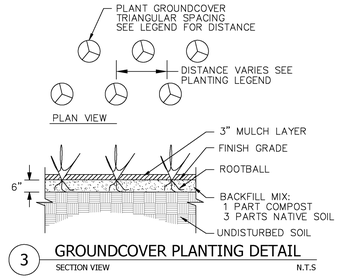
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagestroemia indica	Crape Myrtle	24" box	19	M	
	Lophostemon confertus	Brisbane box	24" box	15	M	
	SHRUB					
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	145	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	26	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	30	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	72	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	132	M	
	Hemerocallis hybrids	Daylily	1 gal	187	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	flats	28	M	plant @ 12" o.c.

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Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the actual planting plan and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 2 feet (61cm). This will be the number of feet necessary for a Linear style planting application. (See chart below.)

A. Dig the trench to the depth based upon the particular barrier chosen.

B. Install the barrier. When using DeepRoot Linear Barriers simply pull the appropriate number of panels out of the box (they come preassembled) and separate the joiner at the correct length. When installing DeepRoot Universal Barriers in a linear fashion you will need to join the appropriate number of panels together.

C. Next place the barrier in the trench with the vertical ribs facing toward the tree and align in a straight fashion. It is helpful to place the barrier against the hardscape. Use the hardscape as a guide and backfill against the barriers to promote a clean smooth fit to the hardscape. Be sure to keep the barrier's double top edge at least 1/2" (13mm) above grade to ensure roots do not grow over the top.

D. Plant the tree(s). The Linear style offers a more expansive rooting growth area, however adverse soil and drainage conditions may exist in the actual planting area. Take steps to ensure healthy growth of the tree at planting. Consult with a local Arborist for planting tips and recommendations.

E. If the tree(s) will be subject to maintenance work such as lawn mowing or weed trimming we strongly recommend the installation of ArborGard+ Tree Trunk Protectors which is placed around the base of young trees to protect them from damage by weed trimmers, lawn mowers and small rodents.

For additional information please consult the 16 page DeepRoot Product Selection and Installation Guidelines.

For information regarding distributors please call: 1 800 ILV ROOT (458.7668). For help with difficult drainage or other difficult installation questions please call DeepRoot Technical Support at: 1 800 ROOT TEX (766.8835).

For a simple formula to determine the quantity of panels required for a Linear application use:
Estimated Diameter of the Tree Canopy at Maturity + 2' (61cm) = Length of Barrier per Side.

As little as one side of the tree may need barrier for root direction as there may be no hardscape elsewhere requiring protection.

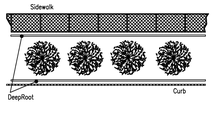
Note: Linear Barriers (LB 12-2 and LB 18-2) are packaged in 2' (61cm) long panels with pre-attached flexible joiners ready to pull out of the carton and install in one continuous line of up to:

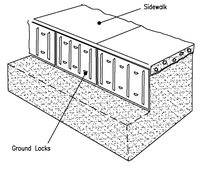
LB 12-2	80' (24 m) per Carton
LB 18-2	52' (16 m) per Carton

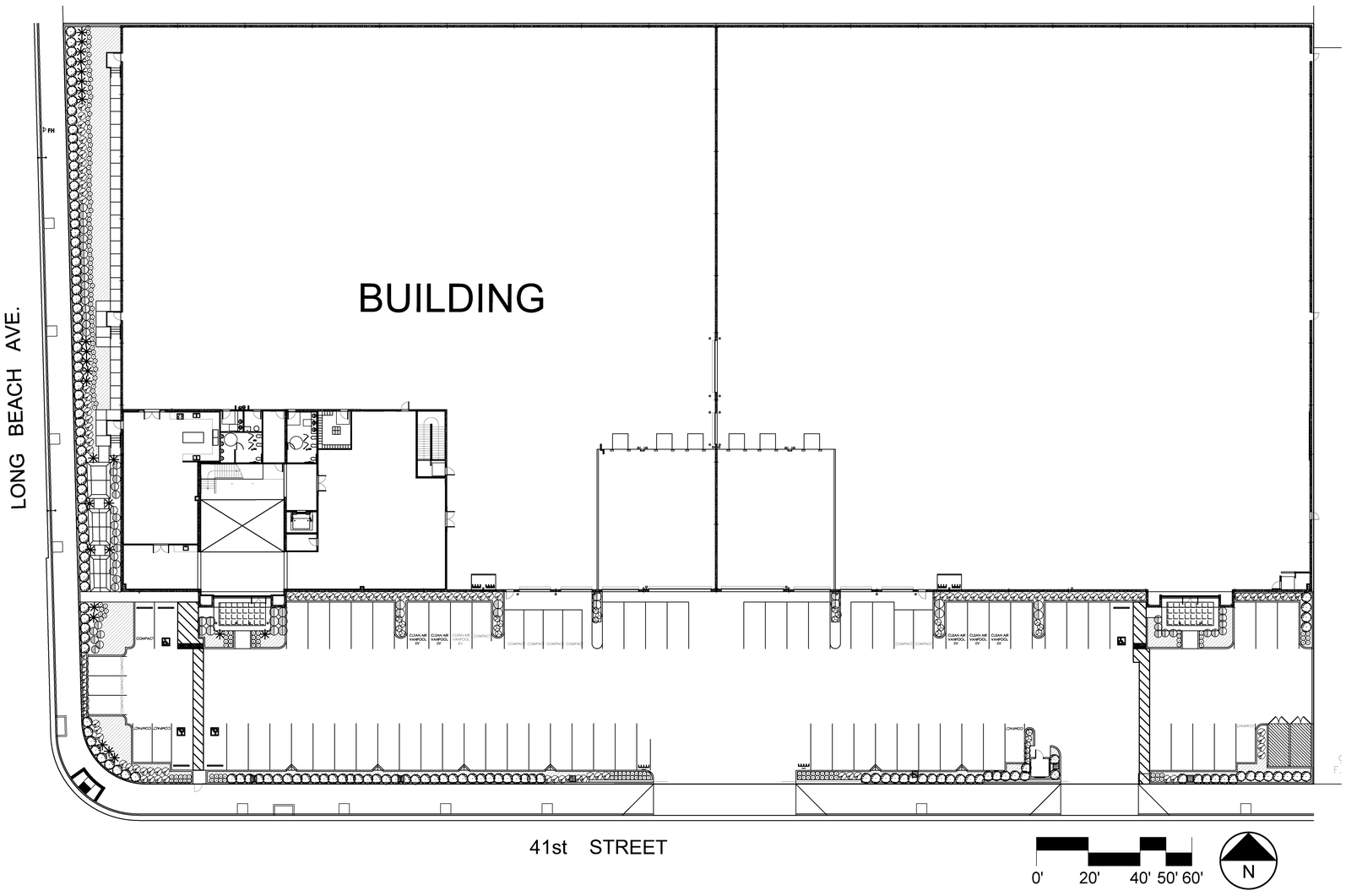
Line can be separated at any two foot interval.

For One Side of Tree: Expected Tree Canopy at Maturity	Number of Feet of Linear Barrier (LB 12 or LB 18)	Optional Universal Barrier (UB) in number of Panels
12' (3.6m) Diameter	+2' (61cm) = 14' (4.2m)	7 Panels
18' (5.5m) Diameter	+2' (61cm) = 20' (6.1m)	10 Panels
24' (7.3m) Diameter	+2' (61cm) = 26' (7.9m)	13 Panels

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.







REVISIONS	BY
05-27-15	
3/26/2016	MT

PHIL MAY LANDSCAPE ARCHITECT
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REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY 2497 EXPIRATION 05-31-17 RENEWAL DATE 03-29-2016 DATE STATE OF CALIFORNIA

PLANTING PLAN

COMMERCIAL BUILDING #2
1701 41st. ST.
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO.	14116
SHEET	L-1
OF	3 SHEETS

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IRRIGATION NOTES

1. It is the responsibility of the irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative. In the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.

5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1–1/2" in diameter and larger. Where roots 1–1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.

8. All main in piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sized shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop–up bodies.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material– see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U–staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtec, or approved equal, and shall be marked "G.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.

15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.	0.60 GPH	30			H
	NETAFIM	CONTROL ZONE LVCZS8010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER / GPM / VALVE SIZE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo x 0.7 x LA in Sq. Ft. x 0.62) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration **Appendix C** (inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
1.0 = ETAF for Special Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ETo		ETAF		LA or SLA (ft2)		Conversion		MAWA (Gallons Per Year)
MAWA for LA=	50.1	x	0.7	x	6,588	x	0.62	=	143,245.00
Total MAWA =					6,588				143,245.00 Gal./ Year

Estimated Applied Water Use
EAWU = ETo x K_L x LA x 0.62 ÷ IE = Gallons per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration Appendix C (inches per year)
KL = Landscape Coefficient
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
IE = Irrigation Efficiency = IME x DU (See definition in Appendix E for example IE percentages)

IME = Irrigation Management Efficiency (90%)
DU = Distribution Uniformity of irrigation head

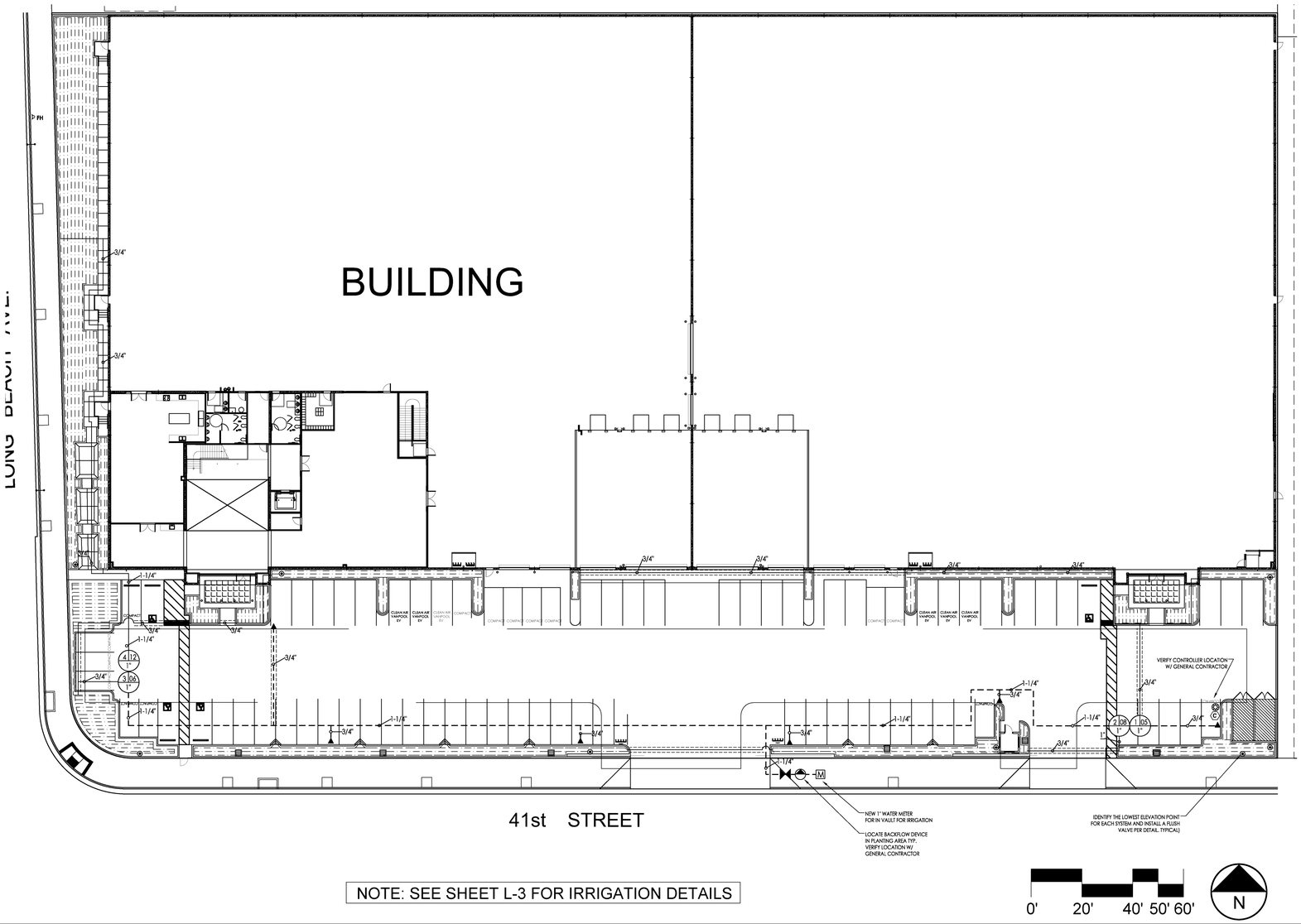
KL = Ks x Kd x Kmc
Ks = species factor (range = 0.1-0.9) (see WUCOLS list for values)
Kd = density factor (range = 0.5-1.3) (see WUCOLS for density value ranges)
Kmc = microclimate factor (range = 0.5-1.4) (see WUCOLS)

EAWU Calculation

	ETo		K_L		LA		Conversion		IE		EAWU (Gallons per year)
Medium Water Using Shrub	50.1	x	0.50	x	6,588	x	0.62	÷	0.90	=	113,686.00
Total EAWU =					6,588						113,686.00 Gal / Year

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

UNDERGROUND SERVICE ALERT
CALL: TOLL FREE
1-800
422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-15	
3/26/2016	MT

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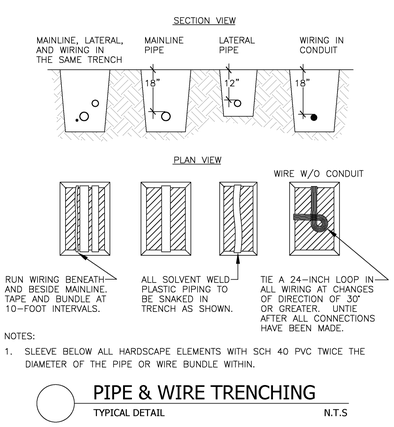
REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY
EXPIRATION DATE 05-31-17
RENEWAL DATE 03-29-2016
DATE
STATE OF CALIFORNIA

IRRIGATION PLAN

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1701 41st. ST.
LOS ANGELES, CA

DRAWN R.S.
CHECKED P.M.
DATE 12/29/14
SCALE 1" = 20'
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SHEET
L-2
OF 3 SHEETS

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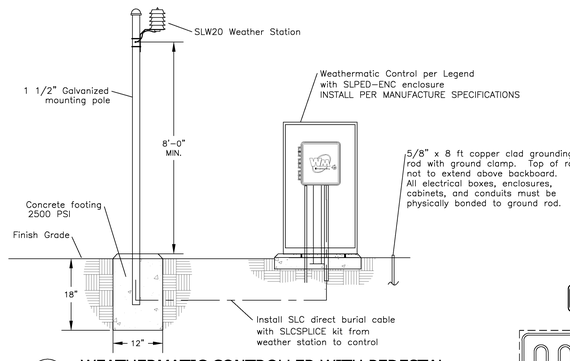


NOTES:

1. SLEEVE BELOW ALL HARDSCAPE ELEMENTS WITH SCH 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.

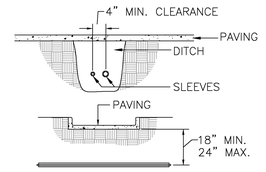
PIPE & WIRE TRENCHING

TYPICAL DETAIL N.T.S



F WEATHERMATIC CONTROLLER WITH PEDESTAL

N.T.S



NOTES:

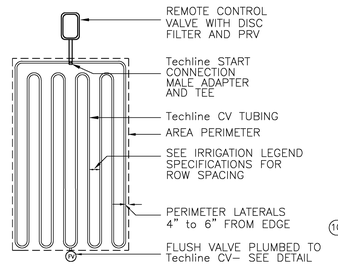
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

G SLEEVES

N.T.S

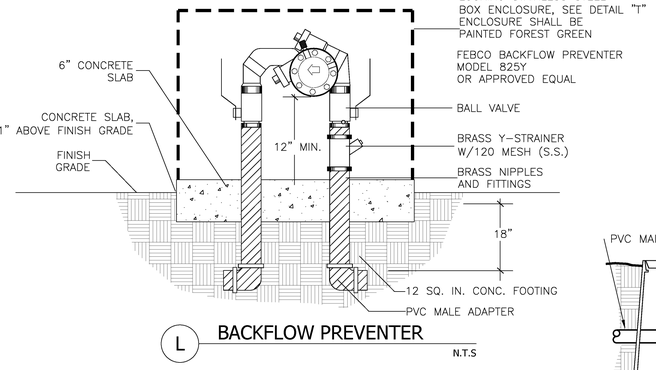
IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.	0.60 GPH	30			H
	NETAFIM	CONTROL ZONE LVCZ58010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L



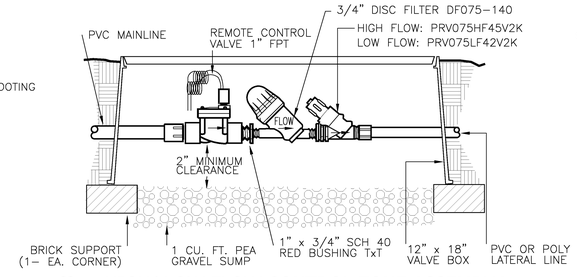
H TECHLINE CV END FEED LAYOUT

N.T.S



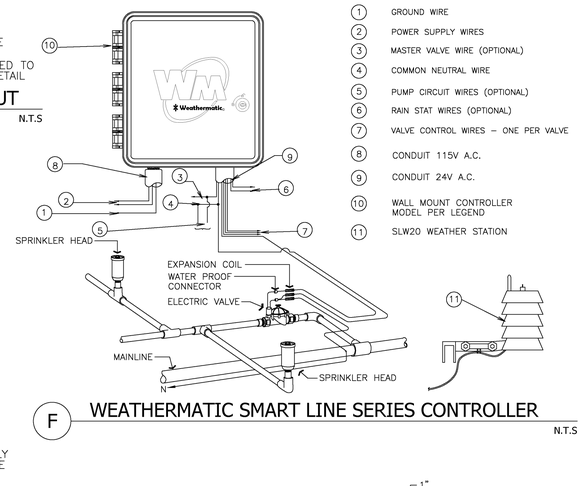
L BACKFLOW PREVENTER

N.T.S



J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY

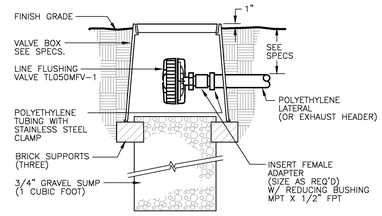
HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM N.T.S



1. GROUND WIRE
2. POWER SUPPLY WIRES
3. MASTER VALVE WIRE (OPTIONAL)
4. COMMON NEUTRAL WIRE
5. PUMP CIRCUIT WIRES (OPTIONAL)
6. RAIN STAT WIRES (OPTIONAL)
7. VALVE CONTROL WIRES – ONE PER VALVE
8. CONDUIT 115V A.C.
9. CONDUIT 24V A.C.
10. WALL MOUNT CONTROLLER MODEL PER LEGEND
11. SLW20 WEATHER STATION

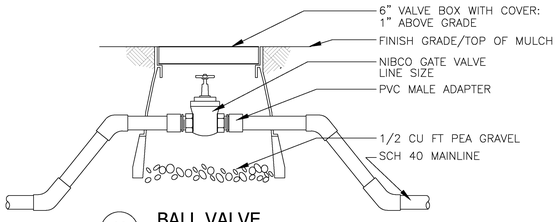
F WEATHERMATIC SMART LINE SERIES CONTROLLER

N.T.S



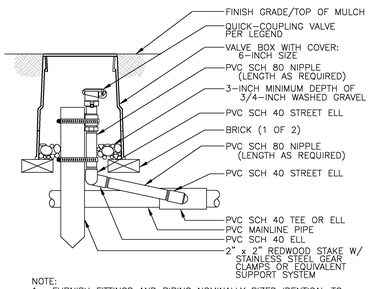
C Techline LINE FLUSHING VALVE

(PLUMBED TO POLY) N.T.S



K BALL VALVE

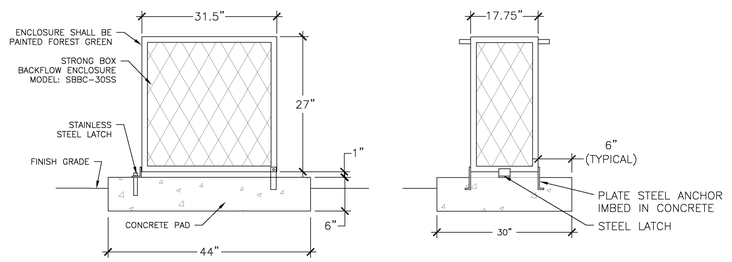
N.T.S



NOTE:
1. FURNISH FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE INLET SIZE.

E QUICK COUPLING VALVE

N.T.S



T BACKFLOW ENCLOSURE

N.T.S

UNDERGROUND SERVICE ALERT

CALL TOLL FREE 1-800 422-4133

AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-15	
3/26/2016	MT

PHIL MAY LANDSCAPE ARCHITECT

1937 West 9th Street
Upland, CA 91786

Phone: 909 373 1959
Fax: 909 373 1958

pmay@philmaydesign.com
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REGISTERED LANDSCAPE ARCHITECT — PHILIP C. MAY — 05-31-13 RENEWAL DATE — 03-29-2016 DATE — STATE OF CALIFORNIA

IRRIGATION DETAILS PLAN

COMMERCIAL BUILDING #2
1701 41st. ST.
LOS ANGELES, CA

DRAWN: R.S.
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SCALE: 1" = 20'
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SHEET: L-3
OF 3 SHEETS

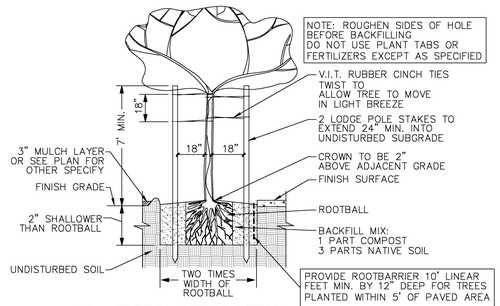
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PLANTING NOTES

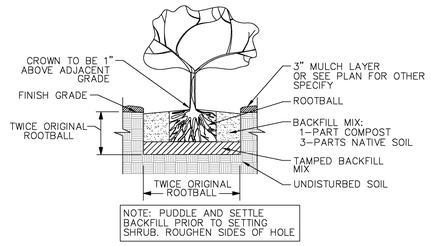
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and flatted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.

   Amount per 1000 square feet
   4 cu. yds. nitrogen stabilized organic compost
   50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

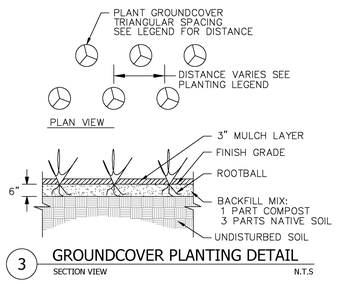
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



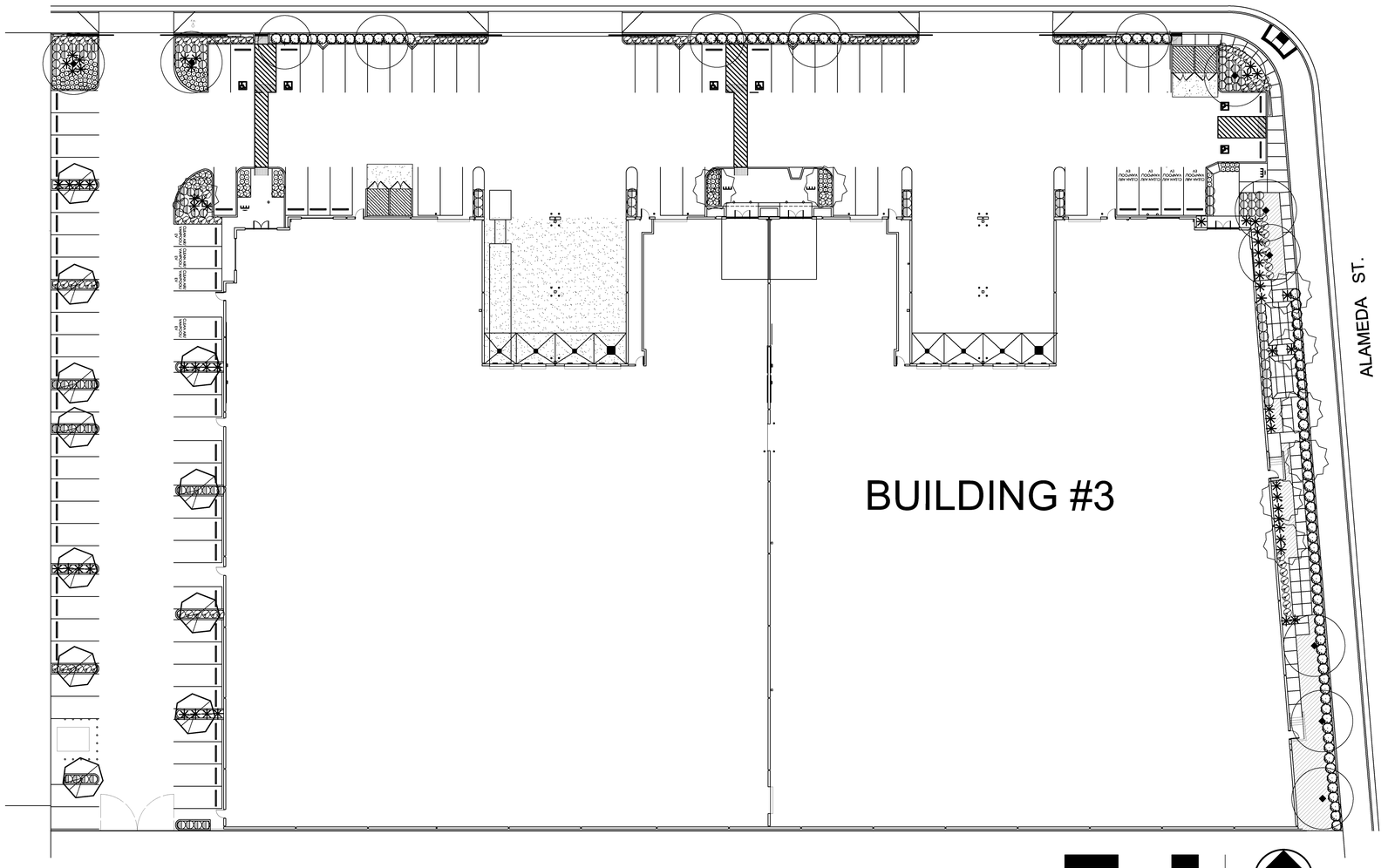
2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

PLANT LEGEND

SYMBOL	BOTANICAL NAME / COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES				
	Arbutus 'Marina'	NCN	24" box	11	M	
	Lagestroemia indica	Crape Myrtle	36" box	8	M	multi trunk
	Lagestroemia indica	Crape Myrtle	24" box	9	M	
	Lophostemon confertus	Brisbane box	24" box	5	M	
	SHRUB				
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	89	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	55	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	26	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	91	M	
	PERENNIALS				
	Dietes bicolor	Fortnight Lily	1 gal	106	M	
	Hemerocallis hybrids	Daylily	1 gal	127	M	mixed colors
	GROUND COVER				
	Trachelospermum jasminoides	Star Jasmine	flats	22	M	plant @ 12" o.c.



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AT LEAST TWO DAYS BEFORE YOU DIG

Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the actual planting plan and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 2 feet (61cm). This will be the number of feet necessary for a Linear style planting application. (See chart below.)

A. Dig the trench to the depth based upon the particular barrier chosen.

B. Install the barrier. When using DeepRoot Linear Barriers simply pull the appropriate number of panels out of the box (they come preassembled) and separate the joiner at the correct length. When installing DeepRoot Universal Barriers in a linear fashion you will need to join the appropriate number of panels together.

C. Next place the barrier in the trench with the vertical ribs facing toward the tree and align in a straight fashion. It is helpful to place the barrier against the hardscape. Use the hardscape as a guide and backfill against the barriers to promote a clean smooth fit to the hardscape. Be sure to keep the barrier's double top edge at least 1/2" (13mm) above grade to ensure roots do not grow over the top.

D. Plant the tree(s). The Linear style offers a more expansive rooting growth area, however adverse soil and drainage conditions may exist in the actual planting area. Take steps to ensure healthy growth of the tree at planting. Consult with a local Arborist for planting tips and recommendations.

E. If the tree(s) will be subject to maintenance work such as lawn mowing or weed trimming we strongly recommend the installation of ArborGard+ Tree Trunk Protectors which is placed around the base of young trees to protect them from damage by weed trimmers, lawn mowers and small rodents.

For additional information please consult the 16 page DeepRoot Product Selection and Installation Guidelines.

For information regarding distributors please call: 1 800 ILV ROOT (458.7668). For help with difficult drainage or other difficult installation questions please call DeepRoot Technical Support at: 1 800 ROOT TEK (766.8835).

For a simple formula to determine the quantity of panels required for a Linear application use:

Estimated Diameter of the Tree Canopy at Maturity + 2' (61cm) = Length of Barrier per Side.

As little as one side of the tree may need barrier for root direction as there may be no hardscape else-where requiring protection.

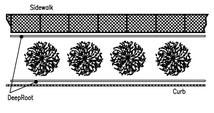
For One Side of Tree: Expected Tree Canopy at Maturity		Number of Feet of Linear Barrier (LB 12 or LB 18)	Optional Universal Barrier (UB) in number of Panels
12' (3.6m) Diameter	+2' (61cm) =	14' (4.2m)	7 Panels
18' (5.5m) Diameter	+2' (61cm) =	20' (6.1m)	10 Panels
24' (7.3m) Diameter	+2' (61cm) =	26' (7.9m)	13 Panels

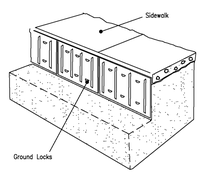
Note: Linear Barriers (LB 12-2 and LB 18-2) are packaged in 2' (61cm) long panels with pre-attached flexible joiners ready to pull out of the carton and install in one continuous line of up to:

LB 12-2	80' (24 m) per Carton
LB 18-2	52' (16 m) per Carton

Line can be separated at any two foot interval.

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





REVISIONS	BY
05-27-15	
3/27/2016	MT

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REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY, ITALIA
EXPIRATION 05-31-17
RENEWAL DATE 03-28-2016
DATE
STATE OF CALIFORNIA

PLANTING PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO.	14116
SHEET	L-1
OF	3 SHEETS

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IRRIGATION NOTES

1. It is the responsibility of the irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative. In the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.

5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1–1/2" in diameter and larger. Where roots 1–1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.

8. All main in piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sized shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop–up bodies.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material– see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U–staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtec, or approved equal, and shall be marked "G.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.

15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TLOSOMFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ58010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER | GPM
VALVE SIZE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo x 0.7 x LA in Sq. Ft. x 0.62) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration **Appendix C** (inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
1.0 = ETAF for Special Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ETo		ETAF		LA or SLA (ft2)		Conversion		MAWA (Gallons Per Year)
MAWA for LA=	50.1	x	0.7	x	5,705	x	0.62	=	124,046.00
Total MAWA =					5,705				124,046.00 Gal / Year

Estimated Applied Water Use
EAWU = ETo x K_L x LA x 0.62 ÷ IE = Gallons per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration Appendix C (inches per year)
KL = Landscape Coefficient
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
IE = Irrigation Efficiency = IME x DU (See definition in Appendix E for example IE percentages)

IME = Irrigation Management Efficiency (90%)
DU = Distribution Uniformity of irrigation head

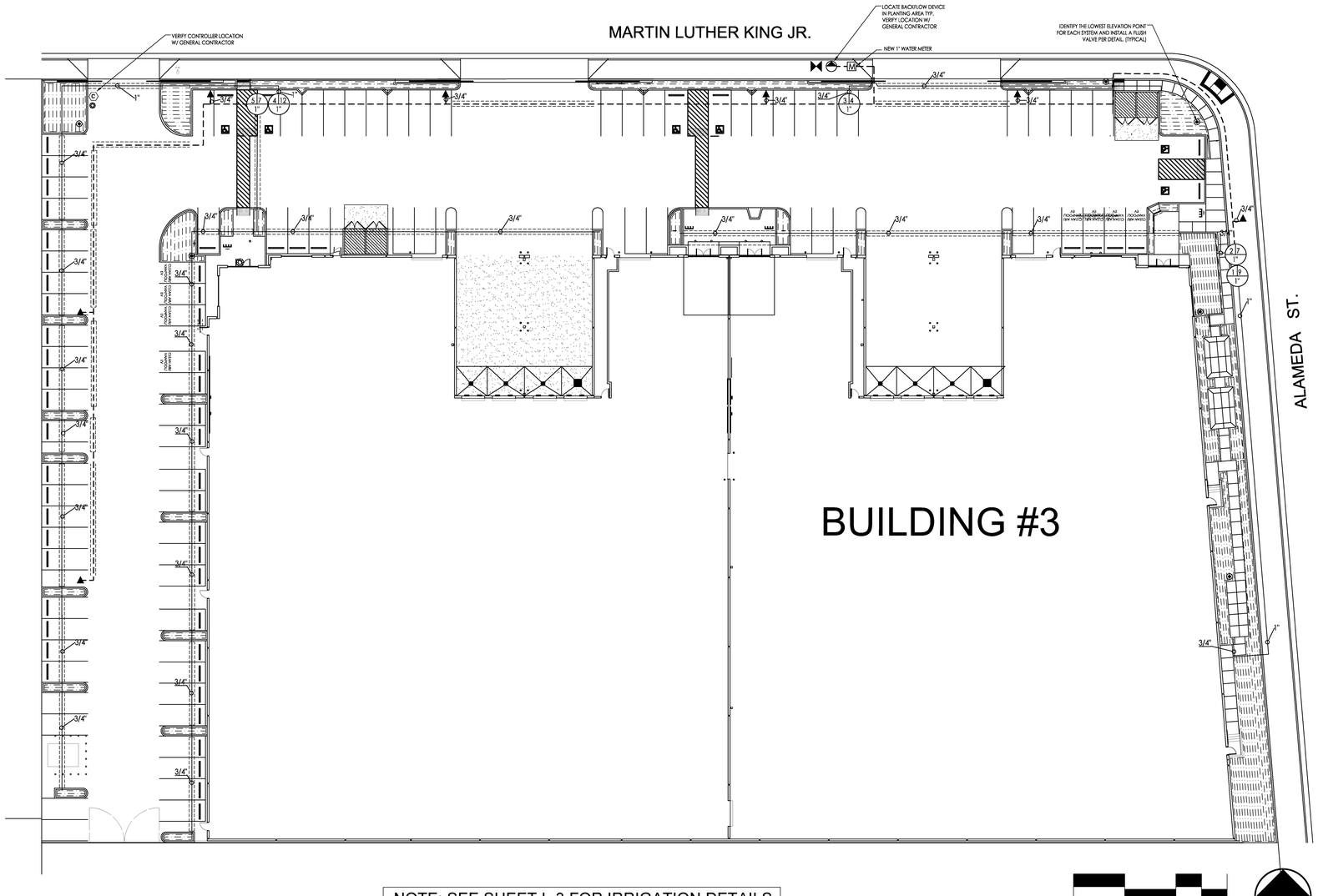
KL = Ks x Kd x Kmc
Ks = species factor (range = 0.1-0.9) (see WUCOLS list for values)
Kd = density factor (range = 0.5-1.3) (see WUCOLS for density value ranges)
Kmc = microclimate factor (range = 0.5-1.4) (see WUCOLS)

EAWU Calculation

	ETo		K_L		LA		Conversion		IE		EAWU (Gallons per year)
Medium Water Using Shrub	50.1	x	0.50	x	5,705	x	0.62	÷	0.90	=	98,449.00
Total EAWU =					5,705						98,449.00 Gal / Year

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

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REVISIONS	BY
05-27-15	
3/27/2016	MT

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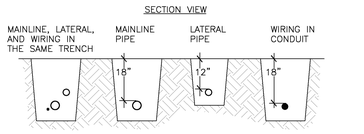
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RENEWAL DATE 03-28-2016
DATE
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IRRIGATION PLAN

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DRAWN R.S.
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DATE 12/29/14
SCALE 1" = 20'
JOB NO. 14116
SHEET
L-2
OF 3 SHEETS

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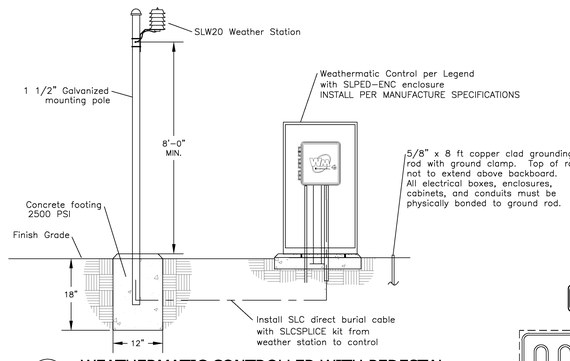


NOTES:

1. SLEEVE BELOW ALL HARDSCAPE ELEMENTS WITH SCH 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.

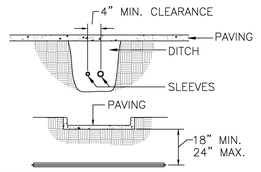
PIPE & WIRE TRENCHING

TYPICAL DETAIL N.T.S



F WEATHERMATIC CONTROLLER WITH PEDESTAL

N.T.S



NOTES:

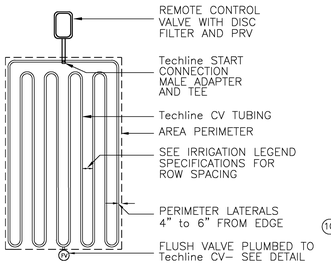
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

G SLEEVES

N.T.S

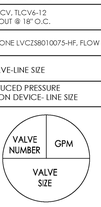
IRRIGATION LEGEND

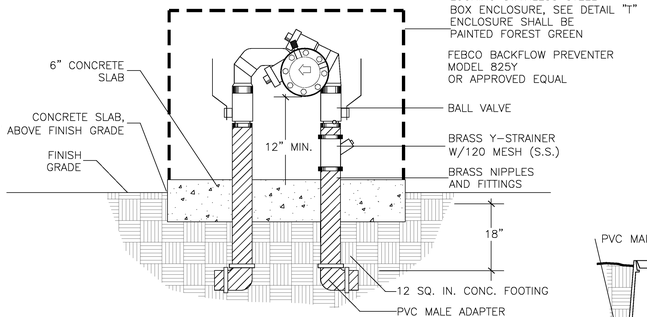
SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ8801007S-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L



H TECHLINE CV END FEED LAYOUT

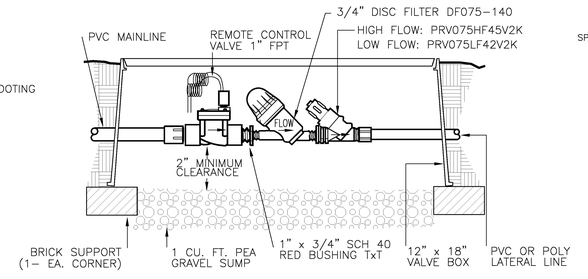
N.T.S





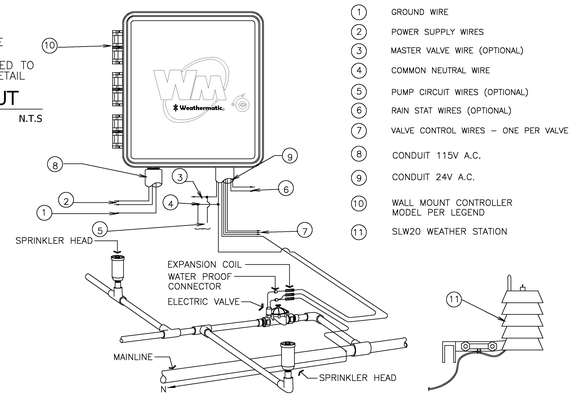
L BACKFLOW PREVENTER

N.T.S



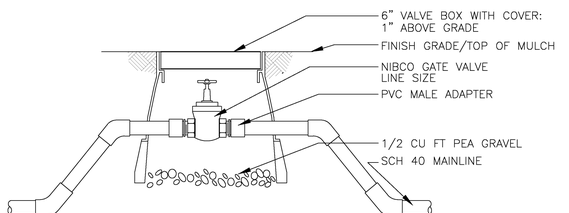
J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY

HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM N.T.S



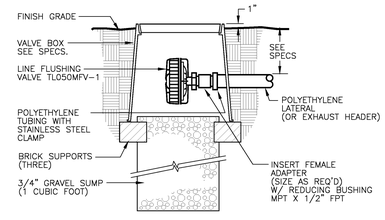
F WEATHERMATIC SMART LINE SERIES CONTROLLER

N.T.S



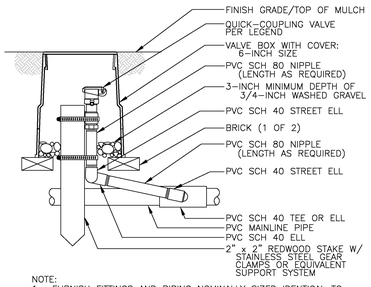
K BALL VALVE

N.T.S



C Techline LINE FLUSHING VALVE

(PLUMBED TO POLY) N.T.S

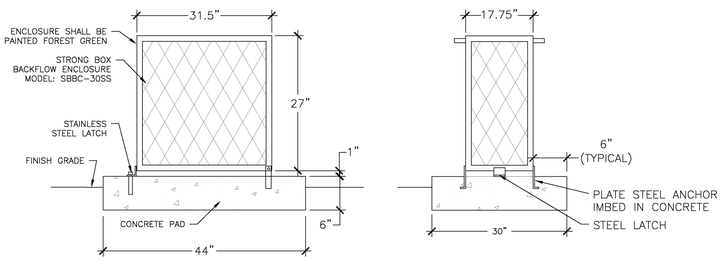


NOTE:

1. FURNISH FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE INLET SIZE.

E QUICK COUPLING VALVE

N.T.S



T BACKFLOW ENCLOSURE

N.T.S

UNDERGROUND SERVICE ALERT

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REVISIONS	BY
05-27-15	
3/27/2016	MT

PHIL MAY LANDSCAPE ARCHITECT

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Upland, CA 91786

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REGISTERED LANDSCAPE ARCHITECT — PHILIP C. MAY — 2973 — EXPIRATION DATE 05-31-17 — RENEWAL DATE 03-28-2016 — DATE — STATE OF CALIFORNIA

IRRIGATION DETAILS PLAN

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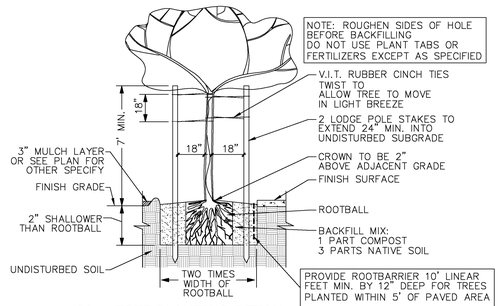
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PLANTING NOTES

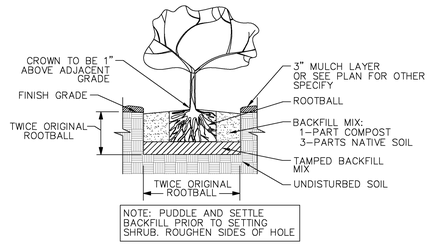
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and flatted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.

   Amount per 1000 square feet
   4 cu. yds. nitrogen stabilized organic compost
   50 pounds agricultural gypsum
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.

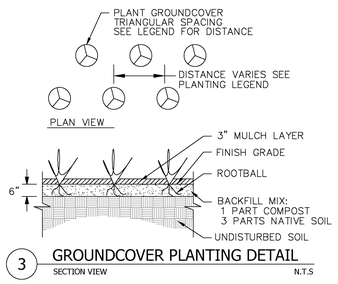
NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



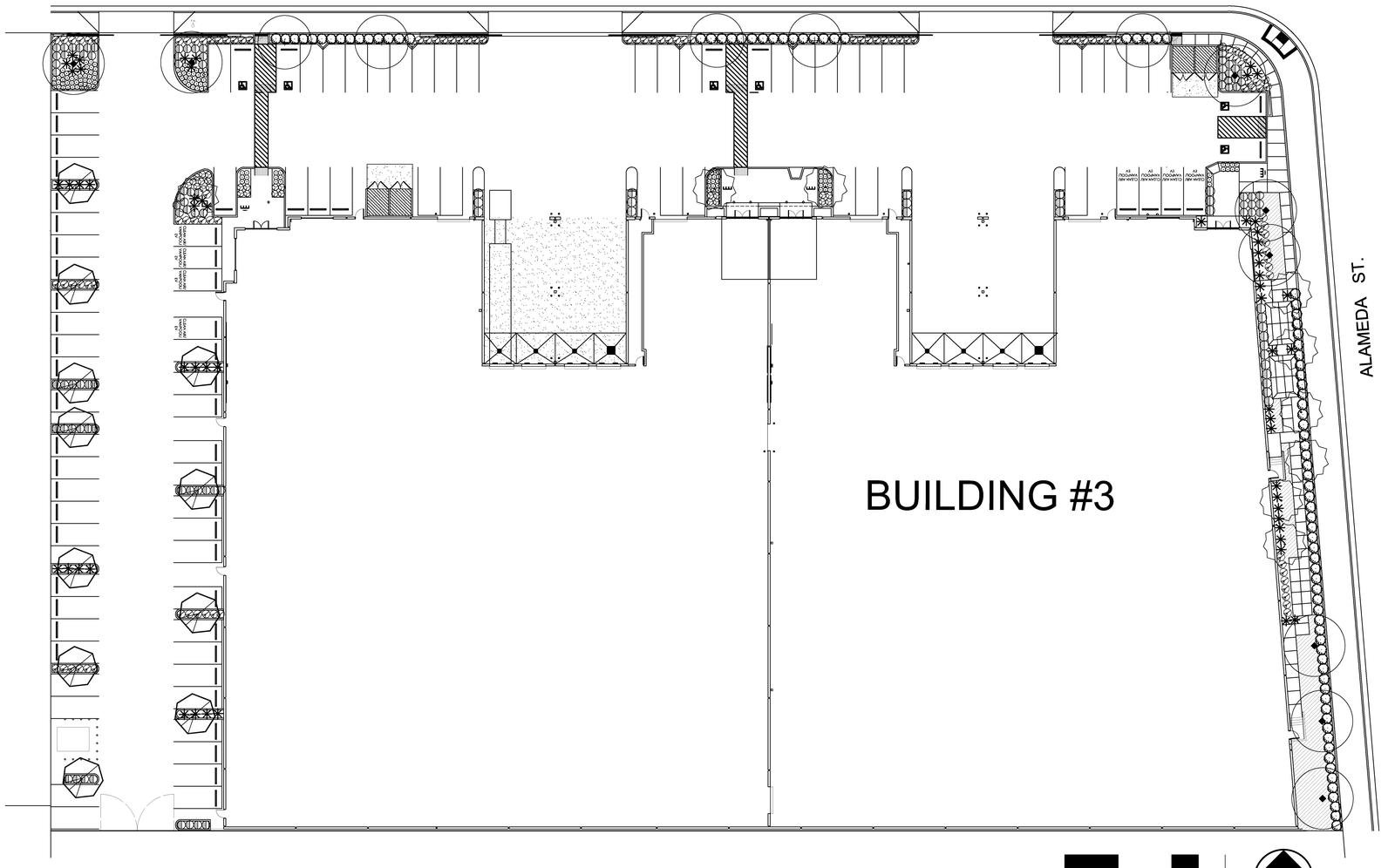
2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S



3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

PLANT LEGEND

SYMBOL	BOTANICAL NAME / COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES				
	Arbutus 'Marina'	NCN	24" box	11	M	
	Lagestroemia indica	Crape Myrtle	36" box	8	M	multi trunk
	Lagestroemia indica	Crape Myrtle	24" box	9	M	
	Lophostemon confertus	Brisbane box	24" box	5	M	
	SHRUB				
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	89	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	55	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	26	M	
	Callistemon 'Little John'	Dwarf Bottlebrush	5 gal	91	M	
	PERENNIALS				
	Dietes bicolor	Fortnight Lily	1 gal	106	M	
	Hemerocallis hybrids	Daylily	1 gal	127	M	mixed colors
	GROUND COVER				
	Trachelospermum jasminoides	Star Jasmine	flats	22	M	plant @ 12" o.c.



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AT LEAST TWO DAYS BEFORE YOU DIG

Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the actual planting plan and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 2 feet (61cm). This will be the number of feet necessary for a Linear style planting application. (See chart below.)

A. Dig the trench to the depth based upon the particular barrier chosen.

B. Install the barrier. When using DeepRoot Linear Barriers simply pull the appropriate number of panels out of the box (they come preassembled) and separate the joiner at the correct length. When installing DeepRoot Universal Barriers in a linear fashion you will need to join the appropriate number of panels together.

C. Next place the barrier in the trench with the vertical ribs facing toward the tree and align in a straight fashion. It is helpful to place the barrier against the hardscape. Use the hardscape as a guide and backfill against the barriers to promote a clean smooth fit to the hardscape. Be sure to keep the barrier's double top edge at least 1/2" (13mm) above grade to ensure roots do not grow over the top.

D. Plant the tree(s). The Linear style offers a more expansive rooting growth area, however adverse soil and drainage conditions may exist in the actual planting area. Take steps to ensure healthy growth of the tree at planting. Consult with a local Arborist for planting tips and recommendations.

E. If the tree(s) will be subject to maintenance work such as lawn mowing or weed trimming we strongly recommend the installation of ArborGard+ Tree Trunk Protectors which is placed around the base of young trees to protect them from damage by weed trimmers, lawn mowers and small rodents.

For additional information please consult the 16 page DeepRoot Product Selection and Installation Guidelines.

For information regarding distributors please call: 1 800 ILV ROOT (458.7668). For help with difficult drainage or other difficult installation questions please call DeepRoot Technical Support at: 1 800 ROOT TEK (766.8835).

For a simple formula to determine the quantity of panels required for a Linear application use:

Estimated Diameter of the Tree Canopy at Maturity + 2' (61cm) = Length of Barrier per Side.

As little as one side of the tree may need barrier for root direction as there may be no hardscape else-where requiring protection.

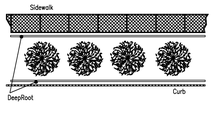
For One Side of Tree: Expected Tree Canopy at Maturity		Number of Feet of Linear Barrier (LB 12 or LB 18)	Optional Universal Barrier (UB) in number of Panels
12' (3.6m) Diameter	+2' (61cm) =	14' (4.2m)	7 Panels
18' (5.5m) Diameter	+2' (61cm) =	20' (6.1m)	10 Panels
24' (7.3m) Diameter	+2' (61cm) =	26' (7.9m)	13 Panels

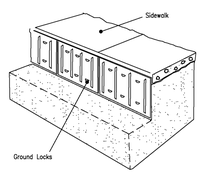
Note: Linear Barriers (LB 12-2 and LB 18-2) are packaged in 2' (61cm) long panels with pre-attached flexible joiners ready to pull out of the carton and install in one continuous line of up to:

LB 12-2	80' (24 m) per Carton
LB 18-2	52' (16 m) per Carton

Line can be separated at any two foot interval.

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





REVISIONS	BY
05-27-15	
3/27/2016	MT

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pmay@philmaydesign.com
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REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY, ITALIA
EXPIRATION 05-31-17
RENEWAL DATE 03-28-2016
DATE
STATE OF CALIFORNIA

PLANTING PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO.	14116
SHEET	L-1
OF	3 SHEETS

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IRRIGATION NOTES

1. It is the responsibility of the irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative. In the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.

5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1–1/2" in diameter and larger. Where roots 1–1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.

8. All main in piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sized shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop–up bodies.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material– see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U–staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtec, or approved equal, and shall be marked "G.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.

15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per three(3) hours constant.

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TLOSOMFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ58010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER | GPM
VALVE SIZE

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo x 0.7 x LA in Sq. Ft. x 0.62) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration **Appendix C** (inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
1.0 = ETAF for Special Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ETo		ETAF		LA or SLA (ft2)		Conversion		MAWA (Gallons Per Year)
MAWA for LA=	50.1	x	0.7	x	5,705	x	0.62	=	124,046.00
Total MAWA =					5,705				124,046.00 Gal / Year

Estimated Applied Water Use
EAWU = ETo x K_L x LA x 0.62 ÷ IE = Gallons per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration Appendix C (inches per year)
KL = Landscape Coefficient
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
IE = Irrigation Efficiency = IME x DU (See definition in Appendix E for example IE percentages)

IME = Irrigation Management Efficiency (90%)
DU = Distribution Uniformity of irrigation head

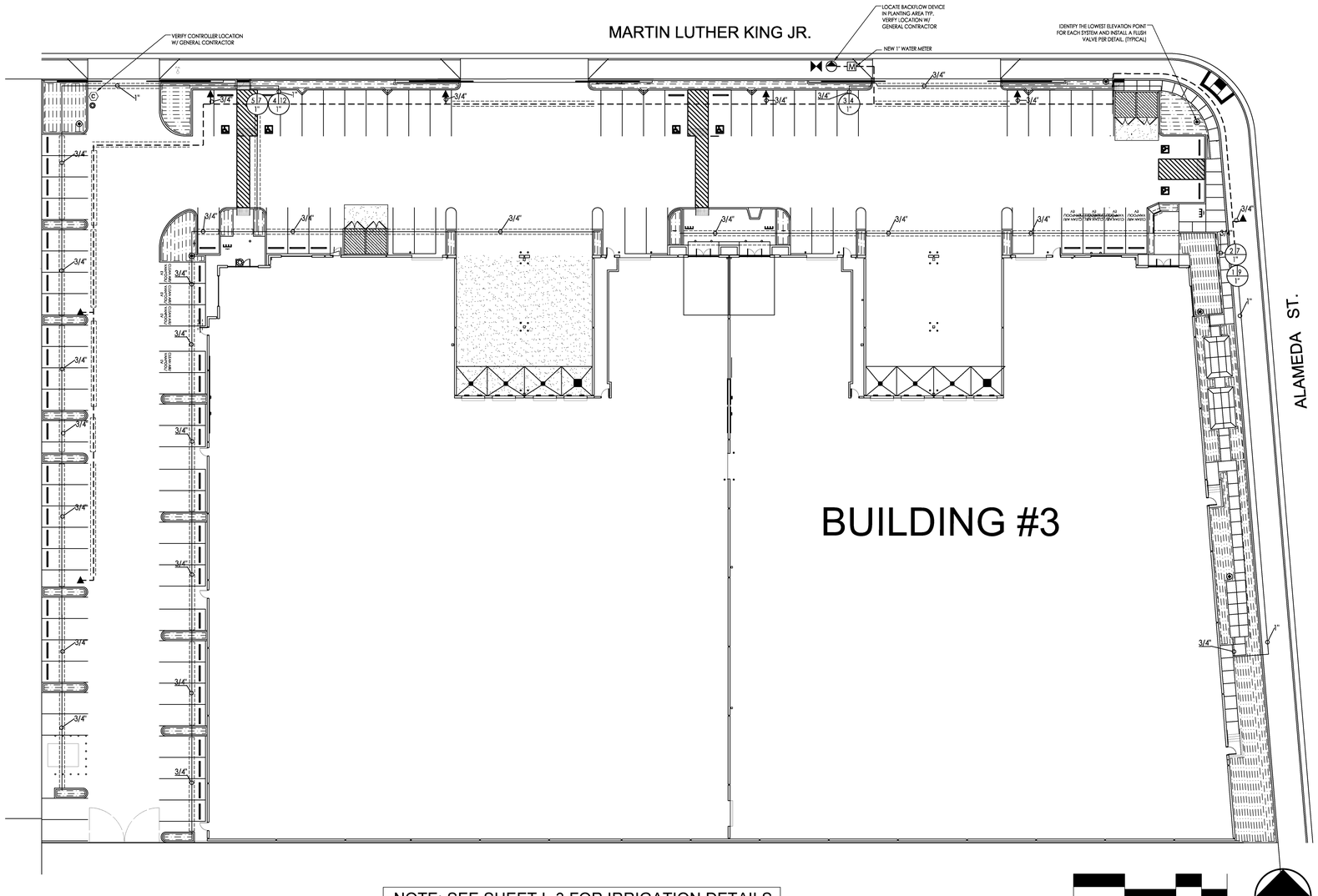
KL = Ks x Kd x Kmc
Ks = species factor (range = 0.1-0.9) (see WUCOLS list for values)
Kd = density factor (range = 0.5-1.3) (see WUCOLS for density value ranges)
Kmc = microclimate factor (range = 0.5-1.4) (see WUCOLS)

EAWU Calculation

	ETo		K_L		LA		Conversion		IE		EAWU (Gallons per year)
Medium Water Using Shrub	50.1	x	0.50	x	5,705	x	0.62	÷	0.90	=	98,449.00
Total EAWU =					5,705						98,449.00 Gal / Year

IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

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AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-15	
3/27/2016	MT

PHIL MAY LANDSCAPE ARCHITECT
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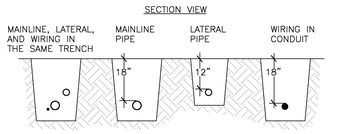
REGISTERED LANDSCAPE ARCHITECT
PHILIP S. MAY
EXPIRATION 05-31-17
RENEWAL DATE 03-28-2016
DATE
STATE OF CALIFORNIA

IRRIGATION PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

DRAWN R.S.
CHECKED P.M.
DATE 12/29/14
SCALE 1" = 20'
JOB NO. 14116
SHEET
L-2
OF 3 SHEETS

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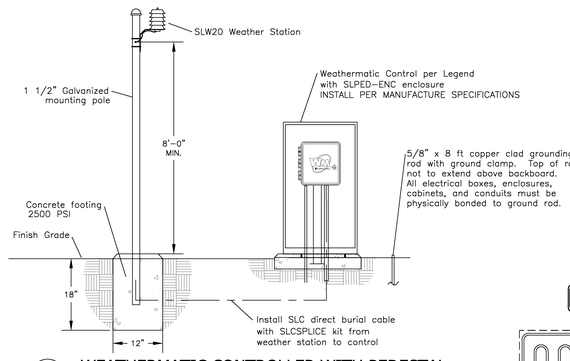


NOTES:

1. SLEEVE BELOW ALL HARDSCAPE ELEMENTS WITH SCH 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.

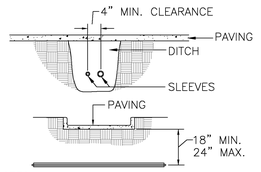
PIPE & WIRE TRENCHING

TYPICAL DETAIL N.T.S



F WEATHERMATIC CONTROLLER WITH PEDESTAL

N.T.S



NOTES:

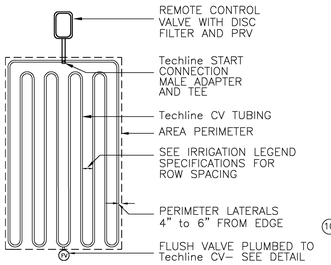
1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

G SLEEVES

N.T.S

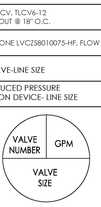
IRRIGATION LEGEND

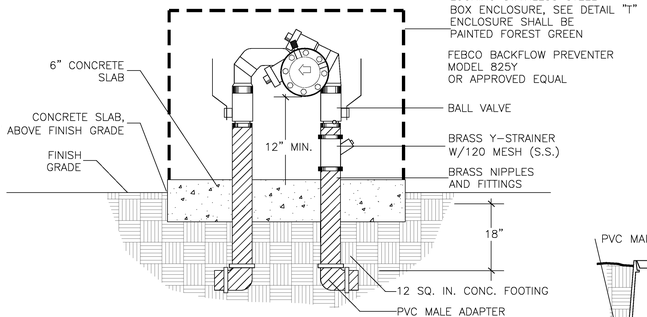
SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.		0.60 GPH	30		H
	NETAFIM	CONTROL ZONE LVCZ8801007S-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L



H TECHLINE CV END FEED LAYOUT

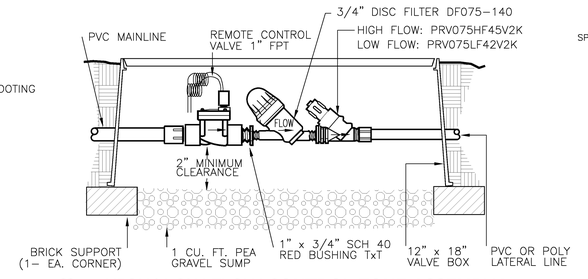
N.T.S





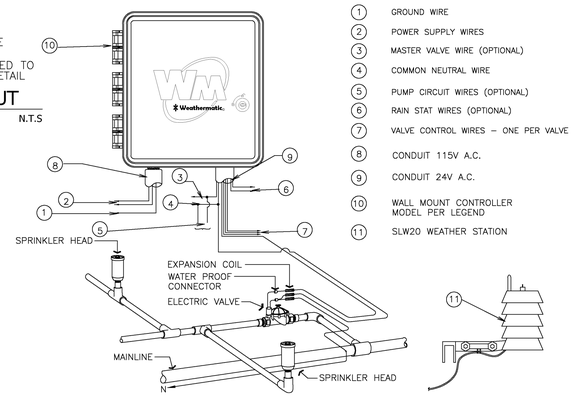
L BACKFLOW PREVENTER

N.T.S



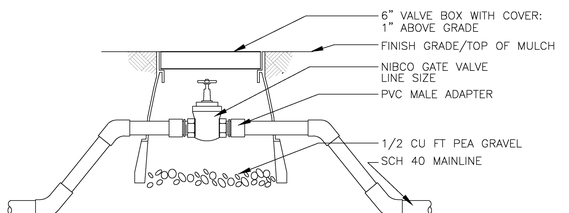
J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY

HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM N.T.S



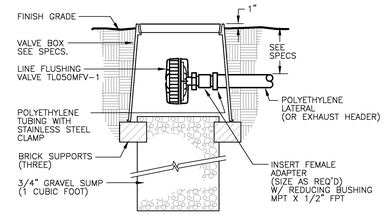
F WEATHERMATIC SMART LINE SERIES CONTROLLER

N.T.S



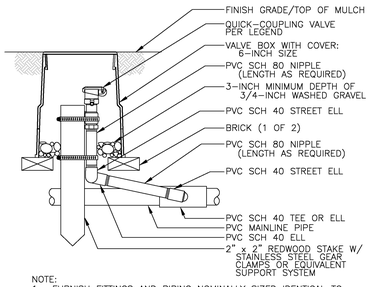
K BALL VALVE

N.T.S



C Techline LINE FLUSHING VALVE

(PLUMBED TO POLY) N.T.S

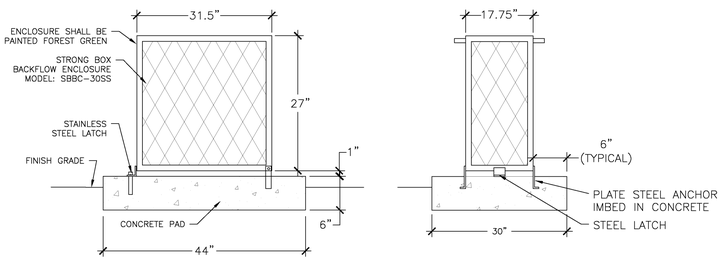


NOTE:

1. FURNISH FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE INLET SIZE.

E QUICK COUPLING VALVE

N.T.S



T BACKFLOW ENCLOSURE

N.T.S

UNDERGROUND SERVICE ALERT

CALL TOLL FREE 1-800 422-4133

AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY
05-27-15	
3/27/2016	MT

PHIL MAY LANDSCAPE ARCHITECT

1937 West 9th Street
Upland, CA 91786

Phone: 909 373 1959
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pmay@philmaydesign.com
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REGISTERED LANDSCAPE ARCHITECT — PHILIP C. MAY — 2973 — EXPIRATION DATE 05-31-17 — RENEWAL DATE 03-28-2016 — DATE — STATE OF CALIFORNIA

IRRIGATION DETAILS PLAN

COMMERCIAL BUILDING #3
4051 ALAMEDA ST
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	12/29/14
SCALE	1" = 20'
JOB NO	14116
SHEET	L-3
OF	3 SHEETS

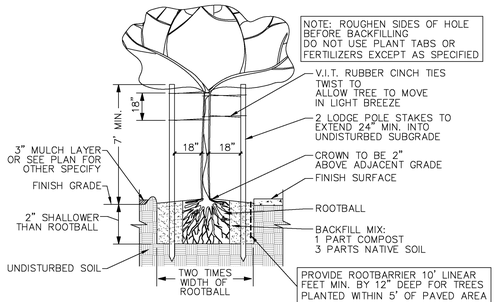
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PLANTING NOTES

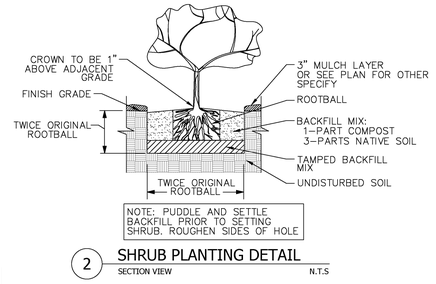
1. Contractor is to review plans, verify site conditions and plant quantities prior to installation. Contractor shall take sole responsibility for any cost incurred due to damage of existing utilities. Plant material quantities are listed for the convenience of the Contractor. Actual number of symbols shall have priority over quantity designated. Conflicts between the Owner and these plans or within these plans shall be brought to the attention of the Landscape Architect prior to landscape installation. Any deviation(s) from the plans or specifications will require written approval from the Owner and/or Landscape Architect. The Contractor shall assume full responsibility for all necessary revisions due to failure to give such notification.
2. The Contractor shall maintain a qualified supervisor on the site at all times during construction through completion of pick-up work.
3. The Contractor shall receive site graded within 0.10 foot of finish grade. Commencement of work indicates Contractor's acceptance of existing grades and conditions. Final grades shall be adjusted by Contractor as directed by Owner's representative. All grading shall be completed prior to commencement of planting operation.
4. The Contractor shall furnish and pay for all container grown trees, shrubs, vines, seeded/sodded turf, hydromulches, and flatted groundcovers. The Contractor shall also be responsible for and pay for planting, staking, and guarantee of all plant materials. See planting details for planting and staking/guying requirements.
5. The Landscape Architect and/or Owner shall approve plant material placement by Contractor prior to installation.
6. Fertilizer for all lawn areas shall be a slow-release, high-nitrogen fertilizer incorporated into the soil during planting.
7. For areas to be landscaped and irrigated, the following amendments shall be uniformly broadcast and thoroughly incorporated 6" deep by means of a rototiller or equal.

Amount per 1000 square feet
4 cu. yds. nitrogen stabilized organic compost
50 pounds agricultural gypsum

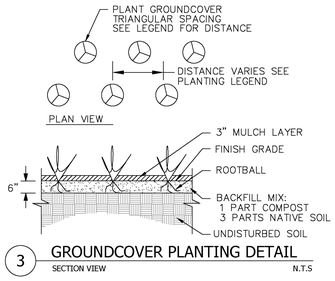
8. The planting areas for trees shall be dug three times the diameter of the root ball and two inches shallower than the rootball. The planting pit, to be dug in the center of the tilled area, shall be as wide as, and two inches shallower than, the rootball. Planting pits for shrubs and perennials shall be dug twice as wide and one-and-a-half times as deep as the rootball.
9. The Landscape Contractor shall maintain all planted areas shown on the plans, including (but not limited to) watering, pruning, edging, and mowing, for a period of thirty (30) days after completion of project and acceptance by Owner.
10. The Landscape Contractor shall warranty and replace any plant material that shows signs of lack of vigor or other unhealthful appearance within ninety (90) days of completion of contract. Trees that have been topped or otherwise improperly pruned by the Contractor shall be removed and replaced by the Contractor at no cost to the Owner.



1 TREE PLANTING DETAIL
SECTION VIEW N.T.S



2 SHRUB PLANTING DETAIL
SECTION VIEW N.T.S

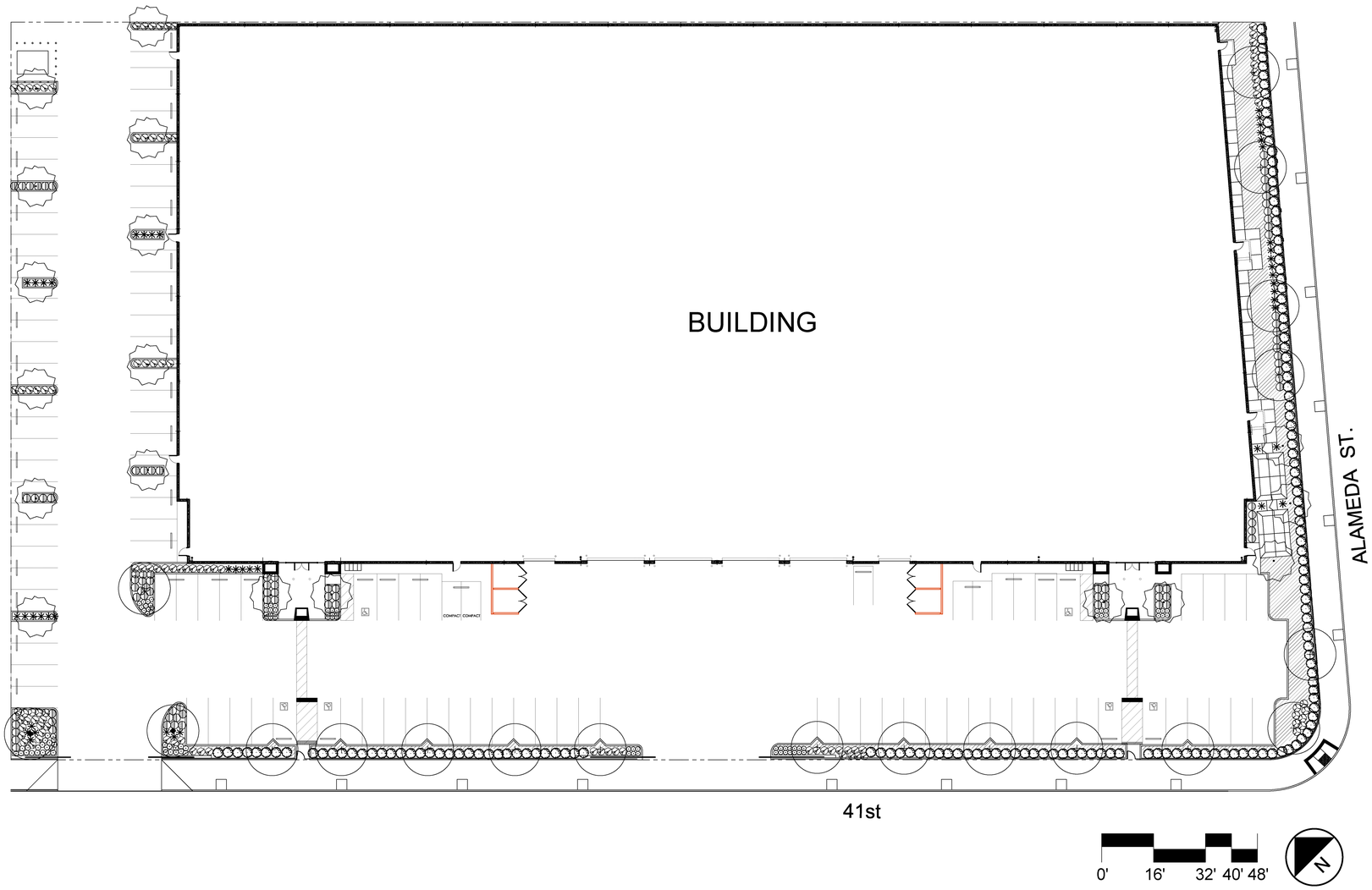


3 GROUNDCOVER PLANTING DETAIL
SECTION VIEW N.T.S

NOTE:
PROVIDE ROOTBARRIERS TO ALL TREES WITHIN FIVE (5') FEET OF HARDSCAPE SURFACE TYP.

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	WATER FACTOR	COMMENTS
	TREES					
	Lagestroemia indica	Crape Myrtle	24" box	17	M	
	Platanus x acerifolia 'Bloodgood'	London Plane Tree	24" box	2	M	
	Lophostemon confertus	Brisbane box	24" box	18	M	
	SHRUB					
	Ligustrum japonicum 'Texanum'	Texas Privet	5 gal	157	M	
	Phormium tenax 'Atropurpureum'	New Zealand Flax	5 gal	45	M	
	Raphiolepis indica 'Ballerina'	Indian Hawthorn	5 gal	13	M	
	Rosa hybrids	Hybrid Tea Rose	5 gal	94	M	
	PERENNIALS					
	Dietes bicolor	Fortnight Lily	1 gal	88	M	
	Hemerocallis hybrids	Daylily	1 gal	96	M	mixed colors
	GROUND COVER					
	Trachelospermum jasminoides	Star Jasmine	Flat	32	M	plant @ 12" O.C



Linear Style Planting with DeepRoot Barriers

Determine the correct number of panels to be used. Depending upon the actual planting plan and the number of trees involved the length of linear barrier will vary, but as a general rule of thumb take the anticipated mature canopy diameter of the tree and add 2 feet (61cm). This will be the number of feet necessary for a Linear style planting application. (See chart below.)

A. Dig the trench to the depth based upon the particular barrier chosen.

B. Install the barrier. When using DeepRoot Linear Barriers simply pull the appropriate number of panels out of the box (they come preassembled) and separate the joiner at the correct length. When installing DeepRoot Universal Barriers in a linear fashion you will need to join the appropriate number of panels together.

C. Next place the barrier in the trench with the vertical ribs facing toward the tree and align in a straight fashion. It is helpful to place the barrier against the hardscape. Use the hardscape as a guide and backfill against the barriers to promote a clean smooth fit to the hardscape. Be sure to keep the barrier's double top edge at least 1/2" (13mm) above grade to ensure roots do not grow over the top.

D. Plant the tree(s). The Linear style offers a more expansive rooting growth area, however adverse soil and drainage conditions may exist in the actual planting area. Take steps to ensure healthy growth of the tree at planting. Consult with a local Arborist for planting tips and recommendations.

E. If the tree(s) will be subject to maintenance work such as lawn mowing or weed trimming we strongly recommend the installation of ArborGard+ Tree Trunk Protectors which is placed around the base of young trees to protect them from damage by weed trimmers, lawn mowers and small rodents.

For additional information please consult the 16 page DeepRoot Product Selection and Installation Guidelines.

For information regarding distributors please call: 1 800 ILV ROOT (458.7668). For help with difficult drainage or other difficult installation questions please call DeepRoot Technical Support at: 1 800 ROOT TEK (766.8835).

For a simple formula to determine the quantity of panels required for a Linear application use:

Estimated Diameter of the Tree Canopy at Maturity + 2' (61cm) = Length of Barrier per Side.

As little as one side of the tree may need barrier for root direction as there may be no hardscape elsewhere requiring protection.

Note: Linear Barriers (LB 12-2 and LB 18-2) are packaged in 2' (61cm) long panels with pre-attached flexible joiners ready to pull out of the carton and install in one continuous line of up to:

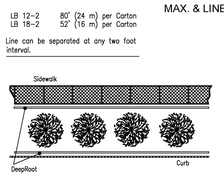
LB 12-2	80' (24 m) per Carton
LB 18-2	52' (16 m) per Carton

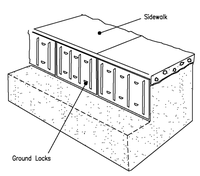
Line can be separated at any two foot interval.

For One Side of Tree

Expected Tree Canopy at Maturity	Number of Feet of Linear Barrier (LB 12 or LB 18)	Optional Universal Barrier (UB) in number of Panels
12' (3.6m) Diameter	+2' (61cm) = 14' (4.2m)	7 Panels
18' (5.5m) Diameter	+2' (61cm) = 20' (6.1m)	10 Panels
24' (7.3m) Diameter	+2' (61cm) = 26' (7.9m)	13 Panels

NOTE: ROOT BARRIERS SHALL BE 12" DEEP MAX. & LINEAR APPLICATION ONLY.





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REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY, JR. PHIL MAY EXPIRATION 05-31-17 RENEWAL DATE 09-19-16 DATE STATE OF CALIFORNIA

REVISIONS	BY

PLANTING PLAN

COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	11/14/14
SCALE	1" = 20'
JOB NO.	14104
SHEET	L-1
OF	3 SHEETS

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IRRIGATION NOTES

1. It is the responsibility of the irrigation Contractor to familiarize himself with all grade differences, location of wall, retaining walls, structures and utilities. The Contractor shall repair or replace, at no additional cost to the owner, all items damaged by his work. The Contractor shall coordinate his work with other contractors for the location and installation of pipe sleeves and laterals through walls, under roadways and paving, etc.

2. The Contractor shall not willfully install the irrigation system as shown on the drawings when it is obvious in the field that unknown obstructions, grade differences, or differences in the area dimension exist that might not have been addressed in the design of the irrigation system. Such obstructions or differences shall be brought to the attention of the Owner's authorized representative. In the event this notification is not performed, the Contractor shall assume full responsibility for any necessary alterations to the work.

3. The Contractor shall obtain, coordinate, and pay for any and all inspections as required.

4. The Contractor shall be responsible and liable for any encroachment into adjacent property, R.O.W.'s easements setbacks or any other legal property restrictions either marked or unmarked.

5. The irrigation system design is based on a minimum operation pressure of 40 PSI and a maximum flow demand of 19.0 GPM. The Contractor shall verify water pressure prior to construction. Report any difference between the water pressure indicated on the drawings and the actual pressure reading at the irrigation point of connection to the Landscape Architect.

6. This design is diagrammatic. All piping, valves, etc., shown within paved areas is for design clarification only and shall be installed in planting areas wherever possible. The Contractor shall locate all valves in shrub or groundcover areas.

7. Trenching within the dripline of large existing trees shall be performed by hand, and with extreme care not to sever roots 1-1/2" in diameter and larger. Where roots 1-1/2" in diameter and larger are encountered, the Contractor shall tunnel under said roots. Exposed roots that have been tunneled under shall be wrapped in wet burlap and kept moist while the trench is open.

8. All main in piping, lateral line piping, and control wires under paving shall be installed in Schedule 40 PVC sleeves at a minimum depth of 18". Sleeves shall be installed before paving is in place. All sleeve sized shall be a minimum of twice the diameter of the pipe to be sleeved. Control wire sleeves shall be of sufficient size for the required number of wires under paving.

9. Pipe sizes shall conform to those shown on the drawings. No substitutions of smaller pipe sizes shall be permitted, but substitutions of larger sizes may be approved. All damaged and rejected pipe shall be removed from the site at the time of said rejection.

10. All sprinkler heads shall be set perpendicular to finish grade unless otherwise specified. Install all heads with double swing joints as per detail. All heads adjacent to parking lots, walks, roads, or other paved areas shall be installed with pop-up bodies.

11. The Contractor shall flush and adjust all sprinkler heads, drip tubing, and valves for optimum coverage with minimal misting and/or over spray onto walks, streets, walls, etc. Substitution of nozzle pattern or radius as required to achieve optimum coverage is responsibility of contractor.

12. All irrigation equipment not otherwise detailed or specified shall be installed as per manufacturer's recommendations and specifications.

13. Drip tubing shall be installed in parallel rows (wherever possible) 18" apart on top the finish grade, and covered with 3" of specify material- see planting plan. Emitter spacing of adjacent rows staggered. Tubing shall be firmly staked in place with U-staples at 5' on center (24" on center around tight curves). In steeply sloped areas, install tubing rows perpendicular to the direction of the slope. Install flush valves at the ends of drip tubing runs, and air/vacuum relief valves at the circuit's major high points (as indicated on plans). Install flush valves and air relief valves in 6" valve boxes. Drip irrigation tubing shall be connected to Schedule 40 PVC supply and exhaust manifolds where indicated on the plans.

14. All remote control valves, gate valves, flush valves, and pressure relief valves shall be installed in suitable valve boxes as shown in details, complete with locking covers. All shall be Carson, Amtec, or approved equal, and shall be marked "G.V." for gate valves, "R.C.V." for remote control valves, etc. Provide expansion coils at each wire connection in valve box as per details.

15. Install all backflow prevention devices and all piping between the point of connection and the backflow preventer as per local codes. Final location of the backflow preventer and automatic controller shall be approved by the Owner.

16. 120 VAC electrical power source at controller location shall be provided by others. The Contractor shall make the final connection from the electrical source to the controller.

17. Pressure test Mainline at 150 PSI per three(3) hours constant.

Point of Connection # 1

Maximum Applied Water Allowance (MAWA)
Total MAWA = (ETo x 0.7 x LA in Sq. Ft. x 0.62) = Gallons per year for LA

where:
MAWA = Maximum Applied Water Allowance (gallons per year)
ETo = Reference Evapotranspiration **Appendix C** (inches per year)
0.7 = Evapotranspiration Adjustment Factor (ETAF)
1.0 = ETAF for Special Landscaped Area
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)

MAWA Calculation:

	ETo		ETAF		LA or SLA (ft2)		Conversion		MAWA (Gallons Per Year)
MAWA for LA=	50.1	x	0.7	x	6,327	x	0.62	=	137,570.00
Total MAWA =					6,327				137,570.00 Gal./ Year

Estimated Applied Water Use
EAWU = ETo x KL x LA x 0.62 = IE = Gallons per year

where:
EAWU = Estimated Applied Water Use (gallons per year)
ETo = Reference Evapotranspiration Appendix C (inches per year)
KL = Landscape Coefficient
LA = Landscaped Area (square feet)
0.62 = Conversion factor (to gallons per square foot)
IE = Irrigation Efficiency = IME x DU (See definition in Appendix E for example IE percentages)

IME = Irrigation Management Efficiency (90%)
DU = Distribution Uniformity of irrigation head

KL = Ka x Kd x Kmc
Ka = species factor (range = 0.1-0.9) (see WUCOLS list for values)
Kd = density factor (range = 0.5-1.3) (see WUCOLS for density value ranges)
Kmc = microclimate factor (range = 0.5-1.4) (see WUCOLS)

EAWU Calculation

	ETo		K_L		LA		Conversion		IE		EAWU (Gallons per year)
Medium Water Using Shrub	50.1	x	0.50	x	6,327	x	0.62	÷	0.90	=	98,264.00
Total EAWU =					6,327						98,264.00 Gal./ Year

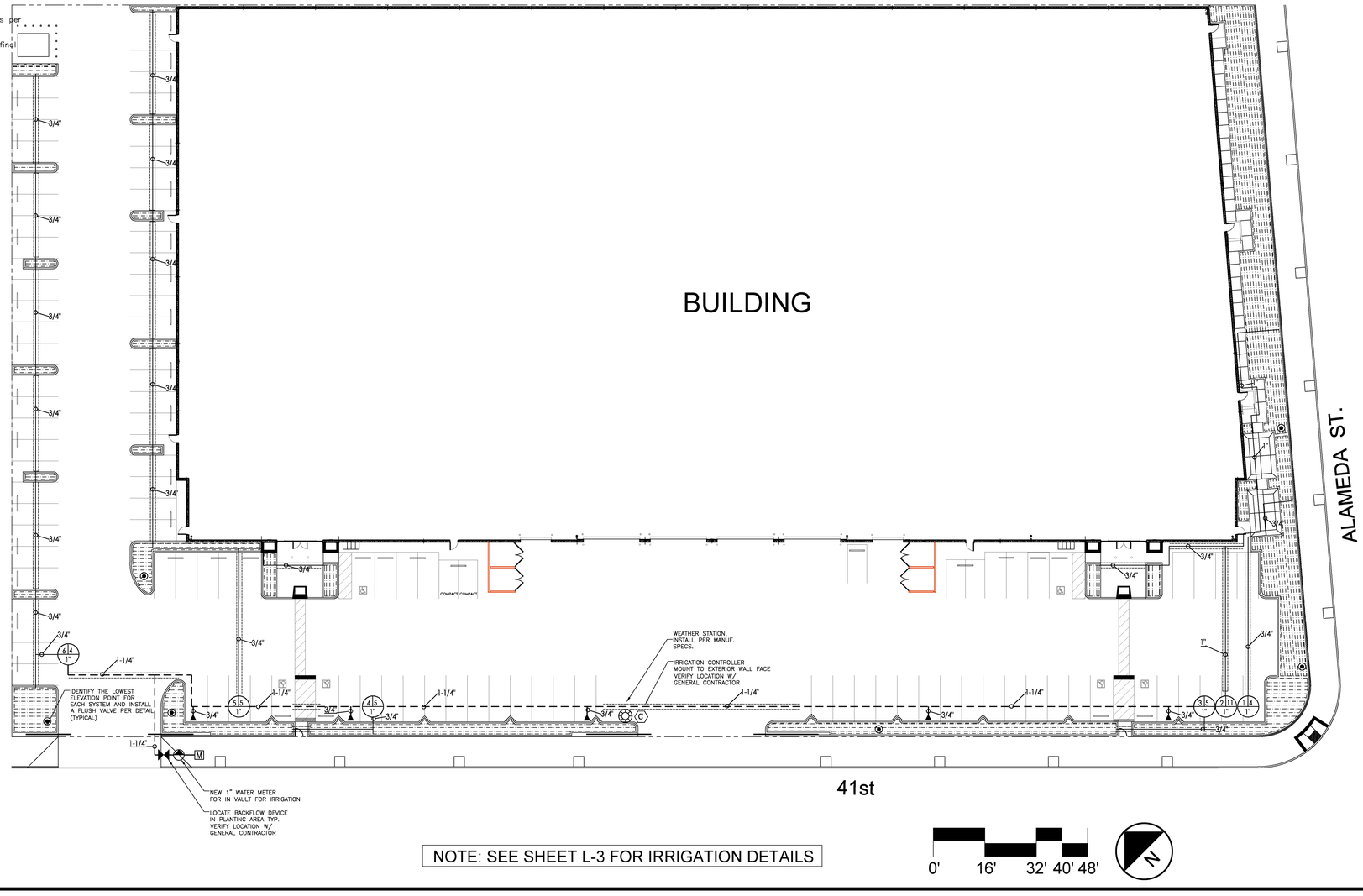
IRRIGATION SCHEDULE

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maximum Minutes per start time	44	44	44	44	44	44	44	44	44	44	44	44
Start times per week	2	3	4	5	5	7	7	7	5	3	3	2
Total minutes per week	88	132	176	220	220	308	308	308	220	132	132	88

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
C	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.	0.60 GPH	30			H
	NETAFIM	CONTROL ZONE LVCZS8010075-HF, FLOW RATE 3.5-17.6 GPM					J
	NIBCO	BALL VALVE-LINE SIZE					K
	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER / GPM / VALVE SIZE



NOTE: SEE SHEET L-3 FOR IRRIGATION DETAILS

0' 16' 32' 40' 48'

N

UNDERGROUND SERVICE ALERT
CALL: TOLL FREE 1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG

REVISIONS	BY

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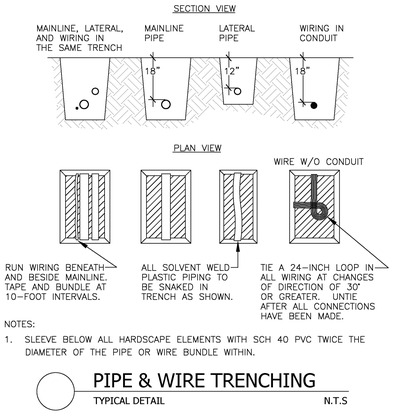
REGISTERED LANDSCAPE ARCHITECT PHILIP S. MAY 2496 EXPIRATION 05-31-17 RENEWAL DATE 09-19-16 DATE STATE OF CALIFORNIA

IRRIGATION PLAN

COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	11/14/14
SCALE	1" = 20'
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SHEET	L-2
OF	3 SHEETS

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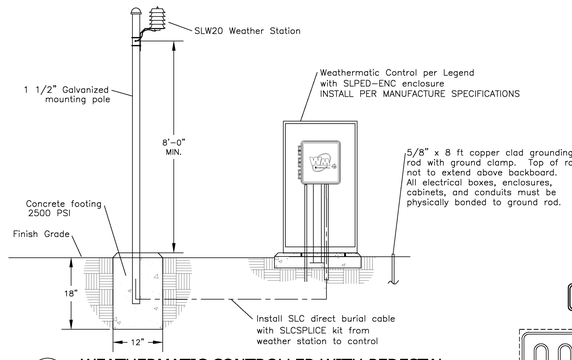


NOTES:

1. SLEEVE BELOW ALL HARDSCAPE ELEMENTS WITH SCH 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.

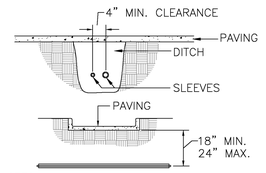
PIPE & WIRE TRENCHING

TYPICAL DETAIL — N.T.S



F WEATHERMATIC CONTROLLER WITH PEDESTAL

N.T.S

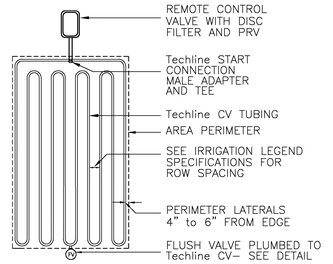


NOTES:

1. ALL PVC IRRIGATION SLEEVES TO BE SCH 40 PIPE.
2. SLEEVES TO BE AT LEAST TWICE THE LINE SIZE.
3. MECHANICALLY TAMP TO 95% COMPACTION.

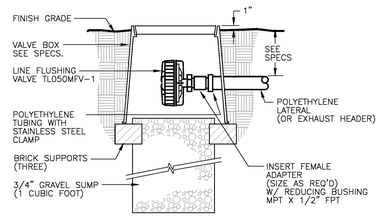
G SLEEVES

N.T.S



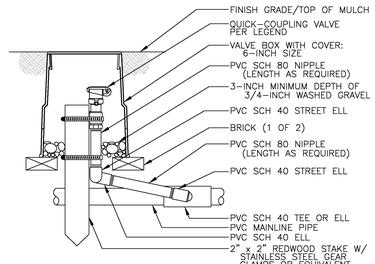
H TECHLINE CV END FEED LAYOUT

N.T.S



C Techline LINE FLUSHING VALVE

(PLUMBED TO POLY) — N.T.S

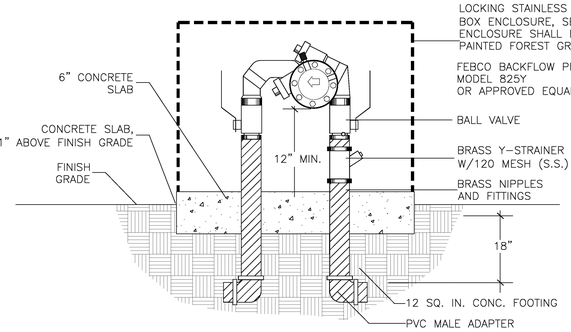


NOTE:

1. FURNISH FITTINGS AND PIPING NOMINALLY SIZED IDENTICAL TO NOMINAL QUICK COUPLING VALVE INLET SIZE.

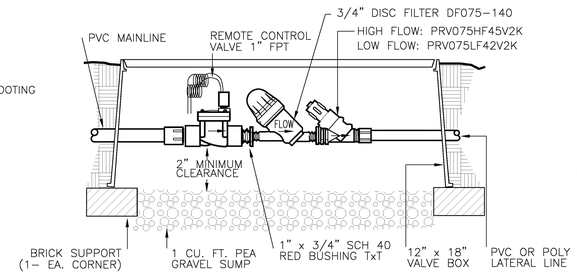
E QUICK COUPLING VALVE

N.T.S



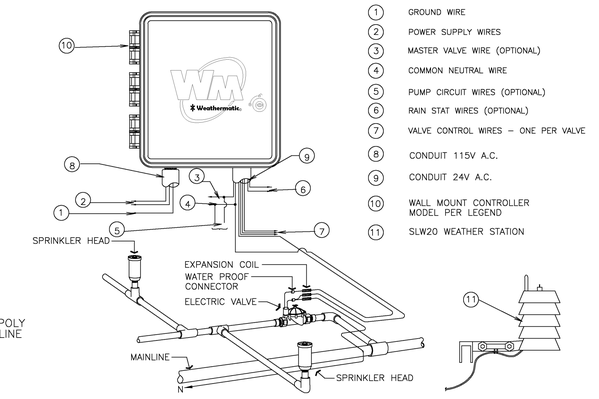
L BACKFLOW PREVENTER

N.T.S



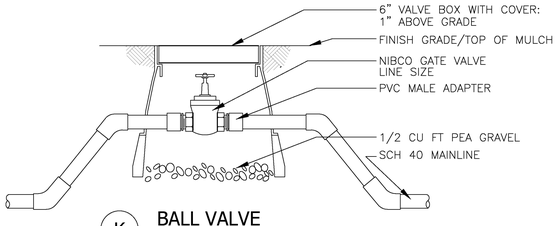
J HIGH/ LOW FLOW CONTROL ZONE ASSEMBLY

HIGH=4.5 - 17.6 GPM OR LOW= 0.25 - 4.4 GPM — N.T.S



F WEATHERMATIC SMART LINE SERIES CONTROLLER

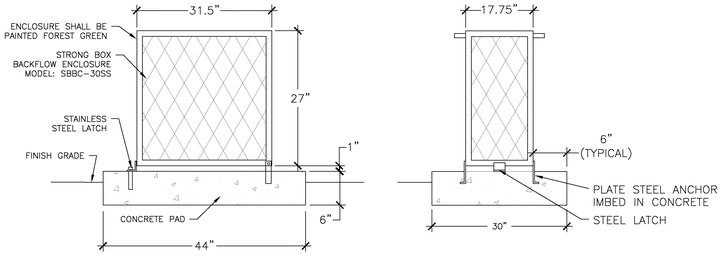
N.T.S



K BALL VALVE

N.T.S

UNDERGROUND SERVICE ALERT
CALL TOLL FREE BEFORE YOU DIG
CALL : TOLL FREE
1-800 422-4133
AT LEAST TWO DAYS BEFORE YOU DIG



T BACKFLOW ENCLOSURE

N.T.S

IRRIGATION LEGEND

SYMBOL	MFG	MODEL/ DESCRIPTION	PATN.	GPM	PSI	RAD	DET
◉	NETAFIM	FLUSH VALVE IN 6" VALVE BOX MODEL # TL050MFV-1					C
▲	RAINBIRD	3/4" QUICK COUPLER-33DRC					E
Ⓒ	WEATHERMATIC	SL800 SMARTLINE PEDESTAL MOUNT, VERIFY LOCATION W/ OWNER					F
⊛	WEATHERMATIC	SLW20 WEATHER STATION MOUNT TO POLE PER MANUF. SPECS.					F
═══	ANY APPROVED	PVC SCHEDULE 40 SLEEVING (AT LEAST TWICE LINE SIZE)					G
——	ANY APPROVED	PVC SCHEDULE 40 LATERAL LINE SIZE AS INDICATED ON PLAN					
- - -	ANY APPROVED	PVC SCHEDULE 40 MAIN LINE SIZE AS INDICATED ON PLAN					
—·—	NETAFIM	TECHLINE CV, TLCV6-12 LINES LAYOUT @ 18" O.C.	0.60 GPH	30			H
⊕	NETAFIM	CONTROL ZONE LVCZSB010075-HF, FLOW RATE 3.5-17.6 GPM					J
⋈	NIBCO	BALL VALVE-LINE SIZE					K
⊛	FEBCO	825Y REDUCED PRESSURE ANTISIPHON DEVICE- LINE SIZE					L

VALVE NUMBER | GPM
VALVE SIZE

THESE DRAWINGS ARE INSTRUMENTS OF SERVICE AND ARE PROPERTY OF PHIL MAY LANDSCAPE ARCHITECT. WRITTEN DIMENSIONS ON THESE DRAWINGS SHALL HAVE PRECEDENCE OVER SCALED DIMENSIONS. CONTRACTORS SHALL VERIFY AND BE RESPONSIBLE FOR ALL DIMENSIONS AND CONDITIONS ON THE JOB AND THIS OFFICE SHALL BE NOTIFIED OF ANY VARIATIONS FROM THE DIMENSIONS AND CONDITIONS SHOWN ON THE DRAWINGS. ALL DESIGNS AND OTHER INFORMATION ON THE DRAWINGS ARE FOR THE USE ON THE SPECIFIED PROJECT AND SHALL NOT BE USED OTHERWISE WITHOUT THE EXPRESS WRITTEN PERMISSION OF PHIL MAY LANDSCAPE ARCHITECT. COPYRIGHTED ©

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REGISTERED LANDSCAPE ARCHITECT — PHILIP C. MAY — No. 2324 — EXPIRATION DATE 05-31-17 — RENEWAL DATE 09-19-16 — DATE — STATE OF CALIFORNIA

IRRIGATION DETAILS PLAN

COMMERCIAL BUILDING #4
4501 ALAMEDA AVENUE
LOS ANGELES, CA

DRAWN	R.S.
CHECKED	P.M.
DATE	11/14/14
SCALE	N/A
JOB NO.	14104
SHEET	L-3
OF	3 SHEETS

EXHIBIT 5

APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☐ Area Planning Commission ☑ City Planning Commission ☐ City Council ☐ Director of Planning

Regarding Case Number: AA-2012-919-PMLA

Project Address: 4051 S. Alameda [1700-1838 (even nos. only) E. Martin Luther King, Jr. Blvd.

Final Date to Appeal: 10/11/2016

Type of Appeal:
- ☐ Appeal by Applicant/Owner
- ☑ Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved
- ☐ Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Mr. Tezozomoc

Company: South Central Farmers

Mailing Address: 11003 Penrose St #1

City: Sun Valley State: CA Zip: 91352

Telephone: 800 249-5240 E-mail: tezo@southcentralfarmers.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

  ☑ Self ☐ Other:

- Is the appeal being filed to support the original applicant's position? ☐ Yes ☑ No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): Mr. Tezozomoc

Company: South Central Farmers

Mailing Address: 11003 Penrose St #1

City: Sun Valley State: CA Zip: 91352

Telephone: 800 249-5240 E-mail: tezo@southcentralfarmers.com

23 pages including the appeal form
10/11/16

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☐ Yes ☐ No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____ Date: 10/07/2016

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
☐ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

CHATTEN-BROWN & CARSTENS
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October 7, 2016

Department of City Planning

Re: Appeal to City Planning Commission
Final EIR for 4051 South Alameda Street Project
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA

On behalf of Mr. Tezozomoc of the South Central Farmers, we hereby appeal the Advisory Agency's approval of parcel map AA-20120919-PMLA and certification of the environmental impact report ("EIR") prepared for the 4051 South Alameda Street Project ("Project") to the City Planning Commission.

The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Notably, the Project would develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner. The community has not benefited from the payment of in lieu fees for this park.

Mr. Tezozomoc is one of the South Central Farmers and would be aggrieved by the City's approval of the warehouse Project. The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden and grew 100 to 150 different species of fruits, vegetables, herbs, including Mesoamerican traditional plants unavailable in local or national markets. Since the farmers' eviction from the site in 2006, the area has not received promised parkland, replacement gardening and community space, or other alleviation of the resulting food desert. The Project would prevent reestablishment of the South Central Community Garden, as well as expose are residents to significant and adverse impacts on already poor air quality and traffic conditions.

Mr. Tezozomoc submitted comments on the draft and final EIRs prepared for the Project, which outline his concerns regarding the Project's compliance with the California Environmental Quality Act (CEQA) and his concerns about the Project's detrimental impact on area residents in greater detail. These comments are attached as Exhibits 1 and 2 to this letter.

In summary, the EIR:

- Fails to adequately describe the Project and to provide sufficient detail about Project operations to permit a thorough analysis of Project operations and environmental impacts;
- Fails to analyze a reasonable range of alternatives that would avoid or reduce the Project's admittedly significant environmental impacts, especially impacts on air quality;
- Forecloses the consideration of alternatives based on impermissibly narrow project objectives;
- Fails to require concrete and enforceable mitigation measures;
- Impermissibly defers analysis and mitigation of environmental impacts to post-approval processes;
- Fails to adequately analyze and mitigate greenhouse gas emissions;
- Fails to adequately disclose and mitigate the Project's noise and air quality impacts on sensitive receptors;
- Fails to provide good faith, reasoned responses to comments submitted by State Agencies and members of the community during the CEQA process; and
- The Statement of Overriding Considerations lacks the required substantial evidence to support its claims that Project alternatives are infeasible and that Project benefits outweigh the Project's admittedly significant environmental impacts.

The EIR's deficiencies were not corrected in the final EIR. Accordingly, the Advisory Agency's certification of the deficient EIR, findings, and statement of overriding considerations are abuses of discretion that must be corrected on appeal.

Sincerely,



Michelle N. Black

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March 9, 2015

Via Email *srimal.hewawitharana@lacity.org*

Srimal Hewawitharana
Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Draft EIR for 4051 South Alameda Street Project,
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA,
DIR-02013-887-SPR, State Clearinghouse No. 2014061030

Dear Ms. Hewawitharana:

On behalf of Mr. Tezozomoc of the South Central Farmers, we submit these comments on the draft environmental impact report ("DEIR") prepared for the 4051 South Alameda Street Project ("Project" or "warehouse project"). The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Specifically, the warehouse project would contain 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space, albeit for undisclosed purposes. Notably, the Project would require significant widening of South Alameda Street, Long Beach Avenue, and 41st Street, reducing the streets' safety and utility for neighborhood pedestrians. It would also develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner.

The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew

Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center.

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR purports to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east.

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decisionmakers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) The South Central Farmers are concerned that the DEIR fails to adequately disclose, analyze, and mitigate many of the warehouse project's significant adverse environmental impacts. Also of great concern is the DEIR's failure to adequately and accurately consider feasible alternatives to the Project that would

reduce the Project's many significant adverse impacts.

I. An Inadequate Project Description Prevents a Complete Analysis of the Project's Potentially Significant Environmental Impacts.

CEQA requires an EIR to contain a project description that gives a "general description of the project's technical, economic, and environmental characteristics." (CEQA Guidelines § 15124(c)). It must also "include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390.) Here, the DEIR discloses that the Project would construct four warehouses to be used for garment manufacturing, but it does not specify the aspects of garment manufacturing that would occur. This failure to describe key elements of the Project prevents the public and decisionmakers from fully evaluating the Project's likely impacts and the accuracy of the information presented in the EIR. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35 [the project description cannot fail to describe key elements of the Project].)

For example, the types of activities occurring in the warehouse will impact the number of workers needed onsite, which will impact the number of shifts, the modes of transportation used by employees, and the Project's likely impacts on traffic and noise. The types of activities will also impact the number of truck trips per day due to deliveries and shipping of finished products, which impact the diesel and other pollutant emissions, which impact the Project's affect on community health. If the warehouses will include dyeing of fabrics, chemicals used in the process and measures for containment and disposal must be disclosed in the DEIR. As none of this information is contained in the DEIR, the DEIR lacks much of the required analysis, and the public and City decisionmakers have been denied the opportunity to fully understand the Project and its likely consequences for the community. "Environmental review derives its vitality from public participation." (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.)

II. The EIR Fails to Consider Alternatives to the Project.

A. The EIR Fails to Consider a Reasonable Range of Alternatives.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the warehouse project, especially in light of its significant acknowledged and unacknowledged adverse impacts. "One of [an EIR's] major functions . . . is to ensure

that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights I, supra*, 47 Cal.3d at 400, quoting *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197; emphasis in original.) Further, "Under CEQA, the public agency bears the burden of *affirmatively demonstrating* that...the agency's approval of the proposed project *followed meaningful consideration of alternatives* and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added.) Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (Guidelines, § 15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.)

The EIR's alternatives analysis fails to satisfy CEQA's statutory mandate by analyzing no actual alternative to the Project other than the compulsory "no project" alternative. While the DEIR lists three alternatives, these alternatives consist of (A) No Project Alternative, (B) Use of Clean Fuel Trucks, (C) Reduced Truck Operations. None of these alternatives includes an alternative use to the warehouse project or to its location. None of these alternatives address the Project's significant impact on utilities and service systems, or on its contribution to the already-severe air quality along the Alameda Corridor.

The unreasonably narrow range of alternatives likely derives from unreasonably narrow project objectives. Use of unduly narrow project objectives violates CEQA. (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166 ["a lead agency may not give a project's purpose an artificially narrow definition"].) The project objectives include a requirement of at least 480,000 square feet of light industrial space, location within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, location along the Alameda Corridor, and provision of enhanced employment opportunities and tax revenue. No information is given about why 480,000 square feet is necessary, or why it must be located in one place, at the expense of a planned 2.6-acre park.

The lead agency must exercise its independent judgment on project objectives, and must not uncritically accept the applicant's objectives. (Pub. Resources Code § 21082.1 (c)(1); *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587]; *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1460.) The City should take this opportunity to think about what would most benefit this community. The DEIR must be revised to include alternatives to the Project, including alternatives that preserve some of the site's 14 acres as open space, and the community garden and park alternatives. The revised DEIR should also consider alternative locations to the

project site for the warehouse project, which could conceivably be located on any industrial zoned land in the area.

B. The EIR Rejects and Fails to Analyze Feasible Park and Community Garden Alternatives.

In order to achieve CEQA's substantive mandate to avoid or reduce adverse environmental impacts, *potentially* feasible alternatives must be analyzed so that the decisionmaking process regarding feasibility can be subject to public review. "If an alternative is identified as at least potentially feasible, an in-depth discussion is required." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1457.)

CEQA imposes a high standard for the rejection of alternatives. A reasonable alternative may only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.) An alternative is considered feasible if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code § 21061.1.) Such alternatives must be discussed "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Guidelines § 15126.6(b).) A project need only feasibly attain "most" of the project objectives, not all of them, to require analysis. (CEQA Guidelines §15126.6(a)(f).)

The South Central Farmers, National Resources Defense Council ("NRDC"), Center for Biological Diversity, and other community advocates have proposed several feasible alternatives aimed at increasing community resiliency and quality of life that would reduce or entirely avoid the Project's significant adverse impacts on air quality, traffic and transportation, and utilities and service systems. An in-depth discussion of these alternatives was required in the EIR, but not provided. (*Save Round Valley, supra*, 157 Cal.App.4th 1457; see 3 AR 1066-1192.)

Based on inapplicable limitations, the DEIR asserts that an alternative reinstituting the community garden alternative is infeasible because it would not comply with applicable zoning. (DEIR, p. VI-3.) The Light Industrial Zone applicable to the project site allows for agricultural uses by right. (Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE) [M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings

or structures other than accessory buildings incident to the use of the land."]; see also DEIR, p. I-5; DEIR, p. II-3.) Further, a community garden alternative would bring economic benefit and community value. Before their removal, 350 families farmed the project site, which produced large amounts of both healthy and economically beneficial produce not otherwise available in the community. The farmers were invested in the community, and thousands of people benefited. Urban parks and gardens are economically beneficial to those located outside of the immediate community, as well. According to the Trust for Public Land (TPL), Long Island's parks provide $2.74 billion in annual economic benefits. (See, http://www.tpl.org/nassau-and-suffolk-counties-park-benefit-report.) These benefits include health benefits of $164 million per year due to the use of parks for outdoor exercise, a one-time property value increase of $5.8 billion due to proximity to open space, benefits due to water filtration, and $288 million in benefits due to the area's thriving agriculture industry. (*Ibid.*) Specifically, TPL's report cited local visits to strawberry fields in the spring and pumpkin patches in the fall, each of which are possible if a community garden alternative is implemented. These benefits will greatly exceed those brought to the community by the creation of low-wage jobs in the warehouse project. The DEIR's analysis also fails to account for grant funding and the assistance of foundations if a community garden alternative were implemented. Such funding and assistance has been offered to maintain a community garden on this site in the past.

Although suggested during NOP comments and completely feasible, the DEIR improperly omits the park or recreation alternative from complete analysis. Only half of Los Angeles residents live within walking distance of a park. (2014 City Park Facts, Trust for Public Land, p. 12, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf .) Children have even less park access than the typical Angeleno. For example, Los Angles has only one park playground per 1,000 residents, falling near the bottom of over 100 cities surveyed by the Trust for Public Land in 2014. (2014 City Park Facts, Trust for Public Land, p. 13, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf.) Within the City, the project site's council district has the least park acreage per child of any district in Los Angeles. (See http://www.environment.ucla.edu/reportcard/article1455.html.)

This lack of park access has disastrous results for society and public health. In park-poor neighborhoods, children play in streets, alleyways, or vacant lots instead of on grassy meadows or soccer fields, if they go outside at all. The Trust for Public Land considers this "a national crisis of inactivity that has contributed to higher rates of obesity, diabetes, asthma, anxiety, and depression." (See, TPL website at http://www.tpl.org/our-work/parks-for-people.) Research suggests that parks promote public health and

revitalize local economies while connecting people and communities. For these reasons, the Southeast Los Angeles Community Plan, within which the project site is located, highlights the need for additional open space in the community. (DEIR, at p. IV.A-11.) The DEIR fails to show why the warehouse project could not be financially and physically feasible if constructed on 11.4 acres of the project site, which would allow the designation of 2.6 acres of the project site as a much need community park. This alternative should be combined with analysis of an off-site alternative and analyzed in a recirculated DEIR.

III. The Project's Mitigation Measures are Impermissibly Vague.

CEQA requires that a project not be approved when there are significant adverse impacts if there are feasible alternatives or mitigation measures that can reduce those impacts. (Publ. Resources Code § 21002; 21002.1(b); CEQA Guidelines 15091(a); 15092(b).) As the DEIR failed to analyze any true alternatives to the Project that would avoid or reduce its disclosed and undisclosed significant impacts, the EIR was required to incorporate mitigation measures. (Pub. Resources Code § 21002.2; Guidelines § 15126.4.)

Specifically, the CEQA Guidelines require any mitigation measure to be "fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2);(CEQA Guidelines § 15097; see also *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 ["Mitigating conditions are not mere expressions of hope."]).) Unfortunately, many of the mitigation measures included in the warehouse project are vague and unenforceable or do not require the most effective mitigation measures feasible to reduce adverse impacts.

For example, mitigation measure Air-4, states that the developer "shall establish incentives for increased transit frequency", but no description is given of what incentives will be given and who they will be offered to. As a result, it is impossible for decisionmakers and the public to evaluate whether this proposed mitigation measure will be effective. Without the incorporation of performance standards, it is also impossible for the City or the community to determine if the developer has complied with the measures. Mitigation measure Air-6 is similarly vague, reading that the developer "shall provide traffic calming measures through street improvements," but these street improvements are never disclosed. In addition to preventing the public and decisionmakers from evaluating the effectiveness of this measure, the failure to provide sufficient information prevents the City from evaluating whether the street calming measures will actually reduce traffic impacts or if they will result in unintended adverse impacts.

Mitigation measure Traffic-3 would reclassify 41st street as a "Collector Street" and requires its widening by 22 feet. However, 41st street west of the Project site is surrounded by residences and passes through a recreation center. Would this conversion to a collector street be accompanied by higher speeds? If so, the DEIR must evaluate the safety and desirability of such a change to this neighborhood.

Other mitigation measures are impermissibly deferred and this too violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4th 777, 793-94; Guidelines Section 15126.4(a)(1)(B).) CEQA requires all mitigation measures for a project to be formulated during the environmental review process so their efficacy can be analyzed in the EIR. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-670.) Courts have prohibited the deferral of mitigation measures because "[t]here cannot be meaningful scrutiny [of an environmental review document] when the mitigation measures are not set forth at the time of project approval." (*Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884.) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the "time of project approval." (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.)

Mitigation measure Utilities and Service Systems-1 requires the applicant to either "have further sewer system gauging obtained to identify specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the system with sufficient capacity." As this mitigation measure makes it clear that the necessary analysis has not yet been conducted, the DEIR proposes impermissibly deferred mitigation. The sewer gauging should be done prior to project approval so that the EIR may mitigate the potential impacts of constructing new sewer lines. At the very least, construction of new sewer lines requires ground disturbance and often impacts roads such that they must be closed during construction of sewer lines and afterward for repair. CEQA requires these impacts to be disclosed now.

IV. The Greenhouse Gas Analysis and Mitigation is Inadequate.

Based on the unsupportable conclusion that the Project will not generate significant greenhouse gas ("GHG") emissions, the DEIR fails to incorporate any mitigation measures for greenhouse gases. (DEIR p. I-12.) Given that the Project would construct nearly one-half million square feet of building space from raw materials, that it would require the use of electricity to operate, and that it would depend on trucks for the delivery of raw materials and the shipment of finished goods, this conclusion lacks substantial evidence. The DEIR must be revised to analyze the GHG emission that would be generated by the Project and to include specific and enforceable mitigation measures to

reduce those emissions. We hereby incorporate the comments submitted by the Center for Biological Diversity on the 2008 project proposed for this site.

V. The EIR's Air Quality Analysis Understates Project Impacts and the Project's Likely Impacts to Human Health.

CEQA requires environmental review of a Project's potentially adverse impacts on human beings. (Guidelines § 15065 subd. (a)(2).) The project site is located along the Alameda Corridor connecting the Ports of Los Angeles and Long Beach to downtown heavy rail lines and is heavily traversed by diesel trucks and railroads. Existing air quality is among the worst in the South Coast Air Basin, and childhood asthma rates far exceed the average. Under these existing conditions, any Project contributions to poor air quality are cumulatively considerable. "One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources." (*King County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692.) This is particularly true with regard to air quality.

The health hazards of poor air quality are well documented. Countless peer-reviewed studies have been published documenting the dangers of living near freeways due to their emissions of ultra fine diesel particulate matter and other air pollutants. Ultra fine particulate matter causes cardiovascular and neuron damage. (See http://www.arb.ca.gov/research/health/healthup/jan03.pdf; see also http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1002973, both incorporated by reference.) Life expectancy rises as fine particle pollution drops. (See, http://articles.latimes.com/2012/dec/04/science/la-sci-sn-fine-particle-pollution-20121204, citing Harvard School of Public Health Study published in *Epidemiology*.) More than 90 percent of the particles in diesel exhaust are ultra fine particles, which are easily inhaled into the lung. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Diesel particulate matter also contains gases such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons, increasing the hazards to human health. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Consequently, diesel particulate matter was declared a toxic air contaminant by the California Air Resources Board in 1998. According to the Air Resources Board, "Diesel particulate matter may cause cancer, premature death, and other health problems." (See http://www.arb.ca.gov/enf/hdvip/ccdet/saej1667.htm; see also,

http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.) These other health problems include asthma, bronchitis, and heart disease. (Miller et al., Long Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women, New England Journal of Medicine, 356:5 (2007) 447-458, available at http://burningissues.org/car-www/pdfs/miller-women-cv-NEJM4-2007.pdf, herein incorporated; see also http://www.ehib.org/page.jsp?page_key=90#pm_health.)

These pollutants have been correlated with asthma, congestive heart failure, autism, and other ailments, with the greatest impact on sensitive receptors such as children and the elderly, many of whom live near the Project site.

A study released just last week linked chronic exposure to microscopic air pollutants in vehicle exhaust, such as that experienced by the residents of this community, to deaths from heart disease. (Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort, Ostro et al., available online at http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/1/ehp.1408565.acco.pdf, herein incorporated.) According to the *Los Angeles Times*' coverage of the study, "The finding bolsters evidence that ultrafine particles... contributor to health problems among people living near traffic." (LA Times, Feb. 25, 2015 http://www.latimes.com/local/lanow/la-tiny-pollutants-linked-to-heart-disease-deaths-20150225-story.html .) Major roadways were among the most ubiquitous of hundreds of sources of ultrafine particle pollution examined in the study.

Given the environmental baseline, the DEIR's air quality analysis and health risk assessment are of particular importance to the City's evaluation of the Project and to the surrounding community. As the Project's truck trips will likely comprise the majority of the Project's air pollution emissions, these analyses are based on the developer's estimated numbers of daily truck trips. Unfortunately, the numbers reported appear to underestimate the Project's true contributions to poor air quality – and especially to diesel emissions – and therefore appear to understate the significance of the Project's air quality impacts.

The EIR assumes that the nearly one-half million square feet of industrial warehouse space will draw only 75 diesel trucks per day. By contrast, a similar, but slightly smaller project evaluated by the city in 2008 at the project site assumed generation of 264 truck trips per day. (Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR.) The DEIR fails to include sufficient information about the Project to justify the claimed 70 percent *reduction* in diesel truck trips that accompany the Project's 10 percent *increase* in size. The DEIR's analysis of air quality impacts and

health risks must be repeated in a revised DEIR that provides substantial evidence for its conclusions. This EIR must also include feasible and enforceable mitigation measures for the operation of the trucks. If this EIR purports to rely on cleaner technologies or other methods of shipping and receiving than diesel trucks, it must be demonstrated that these technologies and methods are both feasible and available to the Project.

VI. The EIR Fails to Adequately Consider the Project's Noise Impacts on Surrounding Residential Neighborhoods.

The Initial Study found the Project's noise impacts insignificant resulting in the DEIR's failure to analyze and mitigate the Project's noise impacts on the community. (Initial Study, Exhibit B, p. 116, 124.) However, this conclusion lacks substantial evidence. First, the project description provides insufficient information about the project to accurately evaluate its proposed noise impacts. This is important, given that homes are located within 153 feet of the Project site. The Initial Study contemplates heating and air conditioning equipment and traffic, but none of the operations of the proposed warehouse itself. (*Id.* at 124.) Second, existing community noise levels are so high that any additional noise levels are considered cumulatively considerable and require mitigation.

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches...Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances." (EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.)

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels. (See, World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Exposure to even

moderately high levels of noise during a single eight-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five to ten point increase in blood pressure. Over time, this noise-induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death. (World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health.

High noise levels also have dramatic developmental impacts on small children, many of whom might reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. Without mitigation, the Project might expose community members to levels of noise that are unsafe for cardiovascular health, mental health, societal well being, and child development.

The noise study performed with the Initial Study concluded that the existing ambient noise levels in the community already vastly exceed those at which residential development is permitted in the City of Los Angeles. (Initial Study, Exhibit B, pp. 118, 121.) The State of California does not consider areas with ambient noise levels above 60 dbA acceptable for residential use. (*Id.* at p. 118.) Multi-family residential uses are "normally acceptable" only below 65 dBA. (*Ibid.*) Residential uses up to 70 dBA are permitted only when precautions are taken to reduce indoor noise levels. (*Ibid.*) Even so, the noise study reported average ambient noise levels of 63-75 dBA Leq with maximum noise levels of up to 94 dBA Leq. If the Project will contribute to *any* increase in community noise levels, the Project will have significant cumulative impacts that must be disclosed, analyzed, and mitigated in the EIR. (*Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1026.) This EIR has failed to do so. The DEIR must be revised to include analysis of the proposed warehouse operations and to include specific, feasible and enforceable mitigation that protects sensitive receptors that reside as close as 153 feet away.

Conclusion

As proposed, the warehouse project would have significant and unavoidable

adverse impacts on a community already facing the noise and air pollution of the Alameda Corridor and the City's densest industrial development. Even so, the DEIR fails to consider alternatives to the Project such as a community garden that have broad community support and that would meet the City's economic objectives. Due to the deficiencies outlined above, the DEIR requires revision and recirculation. The South Central Farmers hope that the City's revised DEIR more accurately discloses, analyzes, and mitigates the Project's likely impacts and that it considers alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

Thank you for your consideration of these comments. We join in the comments submitted by the Natural Resources Defense Council and Public Counsel on this draft EIR and hereby incorporate them by reference. In addition, pursuant to Public Resources Code section 21092.2, we hereby request notice of all future meetings and environmental notices issued pursuant to CEQA at this site. We look forward to reviewing the revisions to this draft environmental impact report.

Sincerely,



Michelle N. Black

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July 5, 2016

Via Email *jenna.monterrosa@lacity.org*

Jenna Monterrosa
Hearing Officer
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Final EIR for 4051 South Alameda Street Project,
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA,
DIR-02013-887-SPR, State Clearinghouse No. 2014061030

Dear Ms. Monterrosa:

On behalf of Mr. Tezozomoc of the South Central Farmers, we submit these comments on the final environmental impact report ("FEIR") prepared for the 4051 South Alameda Street Project ("Project" or "warehouse project"). The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Notably, the Project would require significant widening of South Alameda Street and 41st Street, reducing the streets' safety and utility for neighborhood pedestrians. It would also develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner.

The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake

Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center.

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR and now FEIR purport to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east.

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decisionmakers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) The South Central Farmers are concerned that the final EIR (FEIR) fails to adequately disclose, analyze, and mitigate many of the warehouse project's significant adverse environmental impacts. Despite comments provided on the draft EIR, the FEIR fails to adequately and accurately consider feasible alternatives to the Project that would reduce the Project's many significant adverse impacts. Finally, the FEIR fails to adequately respond to comments provided on the DEIR by government agencies and the public.

I. The FEIR Fails to Adequately Respond to Comments.

CEQA requires a lead agency to respond to comments provided during the draft EIR comment period. When a comment raises a significant environmental issue, the lead agency must address the comment "in detail giving reasons why" the comment was "not accepted." (*Ibid.*) "Conclusory statements unsupported by factual information will not suffice." (*Ibid*; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1124.) The level of detail of responses to comments must be commensurate with the level of detail of the comments. (*Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 878 ["the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the responses"].) This requirement for good faith, reasoned analysis "ensures that stubborn problems or serious criticism are not swept under the rug." (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715, 732.) The courts have held that inadequate responses to comments – alone – can be grounds for voiding a project's approval. (*See, Env. Protection Information Center. v. Johnson* (1985) 170 Cal. App. 3d 604, 627.) Failure to respond to a *single* comment is sufficient to invalidate approval of a FEIR. (*Flanders Foundation v. City of Carmel by-the-Sea* (2012) 202 Cal. App. 4th 603.) The FEIR failed to adequately respond to comments submitted during the DEIR comment period.

a. Comments from Members of the Public.

Although the FEIR provides 75 pages of response to comments this firm submitted on behalf of Mr. Tezozomoc in March 2015, the responses repeat the claims of the DEIR and do not contain the good faith, reasoned analysis required by CEQA. Inadequate responses include, but are not limited to:

- Comment E7-4 notes that the EIR fails to provide any detail about the type of garment manufacturing that would occur at the Project, resulting in an inability to ascertain the types of activities that would occur at the Project and an inability to determine the environmental impacts of these activities as related to noise and traffic. Instead of providing this information, however, Response E7-4 states that "manufacturing" is enough information to apply ITE trip generation rates and determine whether the Project complies with City zoning requirements. The City's methodology in determining significant environmental impacts must be supported by substantial evidence. For example, ITE trip generation rates, however, are only appropriate when the land use under consideration matches the land use upon which the trip generation coefficient is based. Here, there is insufficient information about

the Project to determine if the ITE trip generation rates for manufacturing are appropriate for this Project and whether the City's determination to use these rates is supported by substantial evidence. For the analysis of noise impacts, there is even less evidence. The FEIR fails to adequately respond to the comment.

- Comment E7-5 states that the Project objectives are unduly narrow because they require construction of 480,000 square feet of garment manufacturing space in a specific location. The FEIR's response is that consideration of off-site alternatives would not satisfy the purpose of an alternatives analysis, which is to determine if alternatives would reduce the Project's significant environmental impacts. Here, the FEIR claims that an off-site alternative would move trip generation instead of reducing it, so there is no need to consider constructing the Project elsewhere in order to permit use of part of the site for a garden or park. This response is incorrect and non-responsive. Moving trip generation off-site *would* reduce the Project's significant and unavoidable traffic impacts, as these impacts are specific to the Project site (e.g., the intersection of Washington and Alameda).

- Comment E7-7 points out that the Project could be constructed on 11.4 acres of the Project site, while leaving open 2.6 acres for park or garden development. The response directs the reader to other responses that copy DEIR text arguing that park or garden use would prevent the Project from meeting its objectives. The response does not state how or why 11.4 acres is insufficient space for Project construction and operation. This lack of a good faith, reasoned response violates CEQA.

- Comment E7-9 notes that the DEIR's conclusion that the Project would not contribute significantly to GHG emissions is unsupportable. Response E7-9 states that the EIR relies on a threshold of significance of 25,000 metric tons of CO2 per year as suggested by CARB. However, this threshold of significance has never been adopted by CARB and cannot support the City's determination. In fact, other air quality management districts have enforced much lower thresholds of significance for determining when a project's GHG emissions require mitigation. The EIR must be revised to include feasible and enforceable mitigation for the GHG impacts of constructing and operating nearly half a million square feet of new manufacturing space.

The FEIR is inadequate.

b. Comments from Government Agencies.

CEQA's requirements for responding to comments are even more stringent with regard to DEIR comments submitted by other agencies. "[W]here comments from responsible experts or sister agencies disclose new or conflicting data or opinions that cause concern that the agency may not have fully evaluated the project and its alternatives, these comments may not simply be ignored. There must be good faith, reasoned analysis in response.'" (*Cleary v. County of Stanislaus* (1981) 118 Cal.App.3d 348, 357.)

The final EIR fails to adequately respond to comments provided by the California Department of Transportation (Caltrans). In comment B1-1, Caltrans states, "In the Draft Environmental Impact Report (DEIR) prepared in January 2015 and in the Appendix IS-5 Traffic Impact Study (TIS) prepared on September 26, 2012, Caltrans traffic concerns have not been addressed." The letter details concerns about the EIR's lack of a study of the State's highway facilities, as well as other concerns. However, instead of providing the information and analysis requested by this state agency, the responses to letter B1 merely state that this information was not required. These responses to comment lack the good faith, reasoned analysis required by CEQA.

II. A Statement of Overriding Considerations is Required.

CEQA prohibits approval of projects with significant adverse environmental impacts if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) The Project will admittedly have significant direct and cumulative traffic impacts at the intersection of Alameda Street and Washington Boulevard. (FEIR p. IV-17, 18.) When an agency seeks to approve a project despite its significant unmitigated impacts on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.) A statement of overriding considerations must include two specific findings, supported by substantial evidence. The first finding that must be made is that "There is no feasible way to lessen or avoid the significant effect..." of the project. (Guidelines §§ 15043, 15093(b).) The second finding is that the project's benefits outweigh its significant adverse environmental impacts. (Guidelines § 15093(a).) These findings must both be supported by substantial evidence. (Guidelines § 15093(a)-(b).)

Here, although the Project has begun the approval process, the City has not yet made the statement of overriding considerations available to the public. The statement of overriding considerations must be made available as quickly as possible so that the public and the City's decision makers can evaluate whether the Project's undisclosed but purported benefits will truly outweigh its significant and unavoidable environmental

impacts.

Conclusion

As proposed, the warehouse project would have significant and unavoidable adverse impacts on a community already impacted by the City's densest industrial development. Instead of proposing and evaluating alternatives that have broad community support and that would meet the City's economic objectives, the EIR constrains its analysis to a half million square foot warehouse project in this location. Moreover, the final EIR fails to adequately respond to comments. The required statement of overriding considerations has not been made available. We urge the City to reject this Project until the EIR is revised to more accurately disclose, analyze, and mitigate the Project's likely impacts while considering alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

Sincerely,

Michelle N. Black

EXHIBIT 6

APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☐ Area Planning Commission ☑ City Planning Commission ☐ City Council ☐ Director of Planning

Regarding Case Number: DIR-2013-0887

Project Address: 4051 South Alameda St.

Final Date to Appeal: 10/11/2016

Type of Appeal:
☐ Appeal by Applicant/Owner
☑ Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved
☐ Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Mr. Tezozomoc

Company: South Central Farmers

Mailing Address: 11003 Penrose St. #1

City: Sun Valley State: CA Zip: 91352

Telephone: 800 249-5240 E-mail: tezo@southcentralfarmers.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

  ☑ Self ☐ Other: _____

- Is the appeal being filed to support the original applicant's position? ☐ Yes ☑ No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ E-mail: _____

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☐ Yes ☐ No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____ Date: 10/07/2016

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
☐ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

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October 7, 2016

Department of City Planning

Re: Appeal to City Planning Commission
Case No. DIR-2013-0887-SPR, ENV-2012-920-EIR,
Final EIR for 4051 South Alameda Street Project

On behalf of Mr. Tezozomoc of the South Central Farmers, we hereby appeal the Director of Planning designee's approval of site plan review DIR-2013-0887-SPR, based on certification of the environmental impact report ("EIR") prepared for the 4051 South Alameda Street Project ("Project") to the City Planning Commission.

The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Notably, the Project would develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner. The community has not benefited from the payment of in lieu fees for this park.

Mr. Tezozomoc is one of the South Central Farmers and would be aggrieved by the City's approval of the warehouse Project. The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden and grew 100 to 150 different species of fruits, vegetables, herbs, including Mesoamerican traditional plants unavailable in local or national markets. Since the farmers' eviction from the site in 2006, the area has not received promised parkland, replacement gardening and community space, or other alleviation of the resulting food desert. The Project would prevent reestablishment of the South Central Community Garden, as well as expose are residents to significant and adverse impacts on already poor air quality and traffic conditions.

Mr. Tezozomoc submitted comments on the draft and final EIRs prepared for the Project, which outline his concerns regarding the Project's compliance with the California Environmental Quality Act (CEQA) and his concerns about the Project's detrimental impact on area residents in greater detail. These comments are attached as Exhibits 1 and 2 to this letter.

In summary, the EIR:

- Fails to adequately describe the Project and to provide sufficient detail about Project operations to permit a thorough analysis of Project operations and environmental impacts;
- Fails to analyze a reasonable range of alternatives that would avoid or reduce the Project's admittedly significant environmental impacts, especially impacts on air quality;
- Forecloses the consideration of alternatives based on impermissibly narrow project objectives;
- Fails to require concrete and enforceable mitigation measures;
- Impermissibly defers analysis and mitigation of environmental impacts to post-approval processes;
- Fails to adequately analyze and mitigate greenhouse gas emissions;
- Fails to adequately disclose and mitigate the Project's noise and air quality impacts on sensitive receptors;
- Fails to provide good faith, reasoned responses to comments submitted by State Agencies and members of the community during the CEQA process; and
- The Statement of Overriding Considerations lacks the required substantial evidence to support its claims that Project alternatives are infeasible and that Project benefits outweigh the Project's admittedly significant environmental impacts.

The EIR's deficiencies were not corrected in the final EIR. Accordingly, the Director of Planning designee's approval of the site plan review, in light of the deficient EIR, findings, and statement of overriding considerations is an abuse of discretion that must be corrected on appeal.

Sincerely,

Michelle N. Black

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July 5, 2016

Via Email *jenna.monterrosa@lacity.org*

Jenna Monterrosa
Hearing Officer
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Final EIR for 4051 South Alameda Street Project,
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA,
DIR-02013-887-SPR, State Clearinghouse No. 2014061030

Dear Ms. Monterrosa:

On behalf of Mr. Tezozomoc of the South Central Farmers, we submit these comments on the final environmental impact report ("FEIR") prepared for the 4051 South Alameda Street Project ("Project" or "warehouse project"). The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Notably, the Project would require significant widening of South Alameda Street and 41st Street, reducing the streets' safety and utility for neighborhood pedestrians. It would also develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner.

The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake

Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center.

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR and now FEIR purport to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east.

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decisionmakers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) The South Central Farmers are concerned that the final EIR (FEIR) fails to adequately disclose, analyze, and mitigate many of the warehouse project's significant adverse environmental impacts. Despite comments provided on the draft EIR, the FEIR fails to adequately and accurately consider feasible alternatives to the Project that would reduce the Project's many significant adverse impacts. Finally, the FEIR fails to adequately respond to comments provided on the DEIR by government agencies and the public.

I. The FEIR Fails to Adequately Respond to Comments.

CEQA requires a lead agency to respond to comments provided during the draft EIR comment period. When a comment raises a significant environmental issue, the lead agency must address the comment "in detail giving reasons why" the comment was "not accepted." (*Ibid.*) "Conclusory statements unsupported by factual information will not suffice." (*Ibid*; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1124.) The level of detail of responses to comments must be commensurate with the level of detail of the comments. (*Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 878 ["the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the responses"].) This requirement for good faith, reasoned analysis "ensures that stubborn problems or serious criticism are not swept under the rug." (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715, 732.) The courts have held that inadequate responses to comments – alone – can be grounds for voiding a project's approval. (*See, Env. Protection Information Center. v. Johnson* (1985) 170 Cal. App. 3d 604, 627.) Failure to respond to a *single* comment is sufficient to invalidate approval of a FEIR. (*Flanders Foundation v. City of Carmel by-the-Sea* (2012) 202 Cal. App. 4th 603.) The FEIR failed to adequately respond to comments submitted during the DEIR comment period.

a. Comments from Members of the Public.

Although the FEIR provides 75 pages of response to comments this firm submitted on behalf of Mr. Tezozomoc in March 2015, the responses repeat the claims of the DEIR and do not contain the good faith, reasoned analysis required by CEQA. Inadequate responses include, but are not limited to:

- Comment E7-4 notes that the EIR fails to provide any detail about the type of garment manufacturing that would occur at the Project, resulting in an inability to ascertain the types of activities that would occur at the Project and an inability to determine the environmental impacts of these activities as related to noise and traffic. Instead of providing this information, however, Response E7-4 states that "manufacturing" is enough information to apply ITE trip generation rates and determine whether the Project complies with City zoning requirements. The City's methodology in determining significant environmental impacts must be supported by substantial evidence. For example, ITE trip generation rates, however, are only appropriate when the land use under consideration matches the land use upon which the trip generation coefficient is based. Here, there is insufficient information about

the Project to determine if the ITE trip generation rates for manufacturing are appropriate for this Project and whether the City's determination to use these rates is supported by substantial evidence. For the analysis of noise impacts, there is even less evidence. The FEIR fails to adequately respond to the comment.

- Comment E7-5 states that the Project objectives are unduly narrow because they require construction of 480,000 square feet of garment manufacturing space in a specific location. The FEIR's response is that consideration of off-site alternatives would not satisfy the purpose of an alternatives analysis, which is to determine if alternatives would reduce the Project's significant environmental impacts. Here, the FEIR claims that an off-site alternative would move trip generation instead of reducing it, so there is no need to consider constructing the Project elsewhere in order to permit use of part of the site for a garden or park. This response is incorrect and non-responsive. Moving trip generation off-site *would* reduce the Project's significant and unavoidable traffic impacts, as these impacts are specific to the Project site (e.g., the intersection of Washington and Alameda).

- Comment E7-7 points out that the Project could be constructed on 11.4 acres of the Project site, while leaving open 2.6 acres for park or garden development. The response directs the reader to other responses that copy DEIR text arguing that park or garden use would prevent the Project from meeting its objectives. The response does not state how or why 11.4 acres is insufficient space for Project construction and operation. This lack of a good faith, reasoned response violates CEQA.

- Comment E7-9 notes that the DEIR's conclusion that the Project would not contribute significantly to GHG emissions is unsupportable. Response E7-9 states that the EIR relies on a threshold of significance of 25,000 metric tons of CO2 per year as suggested by CARB. However, this threshold of significance has never been adopted by CARB and cannot support the City's determination. In fact, other air quality management districts have enforced much lower thresholds of significance for determining when a project's GHG emissions require mitigation. The EIR must be revised to include feasible and enforceable mitigation for the GHG impacts of constructing and operating nearly half a million square feet of new manufacturing space.

The FEIR is inadequate.

b. Comments from Government Agencies.

CEQA's requirements for responding to comments are even more stringent with regard to DEIR comments submitted by other agencies. "[W]here comments from responsible experts or sister agencies disclose new or conflicting data or opinions that cause concern that the agency may not have fully evaluated the project and its alternatives, these comments may not simply be ignored. There must be good faith, reasoned analysis in response." (*Cleary v. County of Stanislaus* (1981) 118 Cal.App.3d 348, 357.)

The final EIR fails to adequately respond to comments provided by the California Department of Transportation (Caltrans). In comment B1-1, Caltrans states, "In the Draft Environmental Impact Report (DEIR) prepared in January 2015 and in the Appendix IS-5 Traffic Impact Study (TIS) prepared on September 26, 2012, Caltrans traffic concerns have not been addressed." The letter details concerns about the EIR's lack of a study of the State's highway facilities, as well as other concerns. However, instead of providing the information and analysis requested by this state agency, the responses to letter B1 merely state that this information was not required. These responses to comment lack the good faith, reasoned analysis required by CEQA.

II. A Statement of Overriding Considerations is Required.

CEQA prohibits approval of projects with significant adverse environmental impacts if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) The Project will admittedly have significant direct and cumulative traffic impacts at the intersection of Alameda Street and Washington Boulevard. (FEIR p. IV-17, 18.) When an agency seeks to approve a project despite its significant unmitigated impacts on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.) A statement of overriding considerations must include two specific findings, supported by substantial evidence. The first finding that must be made is that "There is no feasible way to lessen or avoid the significant effect..." of the project. (Guidelines §§ 15043, 15093(b).) The second finding is that the project's benefits outweigh its significant adverse environmental impacts. (Guidelines § 15093(a).) These findings must both be supported by substantial evidence. (Guidelines § 15093(a)-(b).)

Here, although the Project has begun the approval process, the City has not yet made the statement of overriding considerations available to the public. The statement of overriding considerations must be made available as quickly as possible so that the public and the City's decision makers can evaluate whether the Project's undisclosed but purported benefits will truly outweigh its significant and unavoidable environmental

impacts.

Conclusion

As proposed, the warehouse project would have significant and unavoidable adverse impacts on a community already impacted by the City's densest industrial development. Instead of proposing and evaluating alternatives that have broad community support and that would meet the City's economic objectives, the EIR commits to a half million square foot warehouse project in this location. Moreover, the Draft EIR fails to adequately respond to comments. The required statement of overriding considerations has not been made available. We urge the City to reject this Project until the EIR is revised to more accurately disclose, analyze, and mitigate the Project's impacts while considering alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

Sincerely,

Michelle N. Black

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March 9, 2015

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Re: Draft EIR for 4051 South Alameda Street Project,
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA,
DIR-02013-887-SPR, State Clearinghouse No. 2014061030

Dear Ms. Hewawitharana:

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The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew

Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center.

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR purports to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east.

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reduce the Project's many significant adverse impacts.

I. An Inadequate Project Description Prevents a Complete Analysis of the Project's Potentially Significant Environmental Impacts.

CEQA requires an EIR to contain a project description that gives a "general description of the project's technical, economic, and environmental characteristics." (CEQA Guidelines § 15124(c)). It must also "include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390.) Here, the DEIR discloses that the Project would construct four warehouses to be used for garment manufacturing, but it does not specify the aspects of garment manufacturing that would occur. This failure to describe key elements of the Project prevents the public and decisionmakers from fully evaluating the Project's likely impacts and the accuracy of the information presented in the EIR. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35 [the project description cannot fail to describe key elements of the Project].)

For example, the types of activities occurring in the warehouse will impact the number of workers needed onsite, which will impact the number of shifts, the modes of transportation used by employees, and the Project's likely impacts on traffic and noise. The types of activities will also impact the number of truck trips per day due to deliveries and shipping of finished products, which impact the diesel and other pollutant emissions, which impact the Project's affect on community health. If the warehouses will include dyeing of fabrics, chemicals used in the process and measures for containment and disposal must be disclosed in the DEIR. As none of this information is contained in the DEIR, the DEIR lacks much of the required analysis, and the public and City decisionmakers have been denied the opportunity to fully understand the Project and its likely consequences for the community. "Environmental review derives its vitality from public participation." (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.)

II. The EIR Fails to Consider Alternatives to the Project.

A. The EIR Fails to Consider a Reasonable Range of Alternatives.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the warehouse project, especially in light of its significant acknowledged and unacknowledged adverse impacts. "One of [an EIR's] major functions . . . is to ensure

that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights I, supra*, 47 Cal.3d at 400, quoting *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197; emphasis in original.) Further, "Under CEQA, the public agency bears the burden of *affirmatively demonstrating* that...the agency's approval of the proposed project *followed meaningful consideration of alternatives* and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added.) Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (Guidelines, § 15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.)

The EIR's alternatives analysis fails to satisfy CEQA's statutory mandate by analyzing no actual alternative to the Project other than the compulsory "no project" alternative. While the DEIR lists three alternatives, these alternatives consist of (A) No Project Alternative, (B) Use of Clean Fuel Trucks, (C) Reduced Truck Operations. None of these alternatives includes an alternative use to the warehouse project or to its location. None of these alternatives address the Project's significant impact on utilities and service systems, or on its contribution to the already-severe air quality along the Alameda Corridor.

The unreasonably narrow range of alternatives likely derives from unreasonably narrow project objectives. Use of unduly narrow project objectives violates CEQA. (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166 ["a lead agency may not give a project's purpose an artificially narrow definition"].) The project objectives include a requirement of at least 480,000 square feet of light industrial space, location within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, location along the Alameda Corridor, and provision of enhanced employment opportunities and tax revenue. No information is given about why 480,000 square feet is necessary, or why it must be located in one place, at the expense of a planned 2.6-acre park.

The lead agency must exercise its independent judgment on project objectives, and must not uncritically accept the applicant's objectives. (Pub. Resources Code § 21082.1 (c)(1); *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587]; *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1460.) The City should take this opportunity to think about what would most benefit this community. The DEIR must be revised to include alternatives to the Project, including alternatives that preserve some of the site's 14 acres as open space, and the community garden and park alternatives. The revised DEIR should also consider alternative locations to the

project site for the warehouse project, which could conceivably be located on any industrial zoned land in the area.

B. The EIR Rejects and Fails to Analyze Feasible Park and Community Garden Alternatives.

In order to achieve CEQA's substantive mandate to avoid or reduce adverse environmental impacts, *potentially* feasible alternatives must be analyzed so that the decisionmaking process regarding feasibility can be subject to public review. "If an alternative is identified as at least potentially feasible, an in-depth discussion is required." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1457.)

CEQA imposes a high standard for the rejection of alternatives. A reasonable alternative may only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.) An alternative is considered feasible if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code § 21061.1.) Such alternatives must be discussed "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Guidelines § 15126.6(b).) A project need only feasibly attain "most" of the project objectives, not all of them, to require analysis. (CEQA Guidelines §15126.6(a)(f).)

The South Central Farmers, National Resources Defense Council ("NRDC"), Center for Biological Diversity, and other community advocates have proposed several feasible alternatives aimed at increasing community resiliency and quality of life that would reduce or entirely avoid the Project's significant adverse impacts on air quality, traffic and transportation, and utilities and service systems. An in-depth discussion of these alternatives was required in the EIR, but not provided. (*Save Round Valley, supra*, 157 Cal.App.4th 1457; see 3 AR 1066-1192.)

Based on inapplicable limitations, the DEIR asserts that an alternative reinstituting the community garden alternative is infeasible because it would not comply with applicable zoning. (DEIR, p. VI-3.) The Light Industrial Zone applicable to the project site allows for agricultural uses by right. (Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE) [M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings

or structures other than accessory buildings incident to the use of the land."]; see also DEIR, p. I-5; DEIR, p. II-3.) Further, a community garden alternative would bring economic benefit and community value. Before their removal, 350 families farmed the project site, which produced large amounts of both healthy and economically beneficial produce not otherwise available in the community. The farmers were invested in the community, and thousands of people benefited. Urban parks and gardens are economically beneficial to those located outside of the immediate community, as well. According to the Trust for Public Land (TPL), Long Island's parks provide $2.74 billion in annual economic benefits. (See, http://www.tpl.org/nassau-and-suffolk-counties-park-benefit-report.) These benefits include health benefits of $164 million per year due to the use of parks for outdoor exercise, a one-time property value increase of $5.8 billion due to proximity to open space, benefits due to water filtration, and $288 million in benefits due to the area's thriving agriculture industry. (*Ibid.*) Specifically, TPL's report cited local visits to strawberry fields in the spring and pumpkin patches in the fall, each of which are possible if a community garden alternative is implemented. These benefits will greatly exceed those brought to the community by the creation of low-wage jobs in the warehouse project. The DEIR's analysis also fails to account for grant funding and the assistance of foundations if a community garden alternative were implemented. Such funding and assistance has been offered to maintain a community garden on this site in the past.

Although suggested during NOP comments and completely feasible, the DEIR improperly omits the park or recreation alternative from complete analysis. Only half of Los Angeles residents live within walking distance of a park. (2014 City Park Facts, Trust for Public Land, p. 12, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf .) Children have even less park access than the typical Angeleno. For example, Los Angles has only one park playground per 1,000 residents, falling near the bottom of over 100 cities surveyed by the Trust for Public Land in 2014. (2014 City Park Facts, Trust for Public Land, p. 13, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf.) Within the City, the project site's council district has the least park acreage per child of any district in Los Angeles. (See http://www.environment.ucla.edu/reportcard/article1455.html.)

This lack of park access has disastrous results for society and public health. In park-poor neighborhoods, children play in streets, alleyways, or vacant lots instead of on grassy meadows or soccer fields, if they go outside at all. The Trust for Public Land considers this "a national crisis of inactivity that has contributed to higher rates of obesity, diabetes, asthma, anxiety, and depression." (See, TPL website at http://www.tpl.org/our-work/parks-for-people.) Research suggests that parks promote public health and

revitalize local economies while connecting people and communities. For these reasons, the Southeast Los Angeles Community Plan, within which the project site is located, highlights the need for additional open space in the community. (DEIR, at p. IV.A-11.) The DEIR fails to show why the warehouse project could not be financially and physically feasible if constructed on 11.4 acres of the project site, which would allow the designation of 2.6 acres of the project site as a much need community park. This alternative should be combined with analysis of an off-site alternative and analyzed in a recirculated DEIR.

III. The Project's Mitigation Measures are Impermissibly Vague.

CEQA requires that a project not be approved when there are significant adverse impacts if there are feasible alternatives or mitigation measures that can reduce those impacts. (Publ. Resources Code § 21002; 21002.1(b); CEQA Guidelines 15091(a); 15092(b).) As the DEIR failed to analyze any true alternatives to the Project that would avoid or reduce its disclosed and undisclosed significant impacts, the EIR was required to incorporate mitigation measures. (Pub. Resources Code § 21002.2; Guidelines § 15126.4.)

Specifically, the CEQA Guidelines require any mitigation measure to be "fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2);(CEQA Guidelines § 15097; see also *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 ["Mitigating conditions are not mere expressions of hope."]).) Unfortunately, many of the mitigation measures included in the warehouse project are vague and unenforceable or do not require the most effective mitigation measures feasible to reduce adverse impacts.

For example, mitigation measure Air-4, states that the developer "shall establish incentives for increased transit frequency", but no description is given of what incentives will be given and who they will be offered to. As a result, it is impossible for decisionmakers and the public to evaluate whether this proposed mitigation measure will be effective. Without the incorporation of performance standards, it is also impossible for the City or the community to determine if the developer has complied with the measures. Mitigation measure Air-6 is similarly vague, reading that the developer "shall provide traffic calming measures through street improvements," but these street improvements are never disclosed. In addition to preventing the public and decisionmakers from evaluating the effectiveness of this measure, the failure to provide sufficient information prevents the City from evaluating whether the street calming measures will actually reduce traffic impacts or if they will result in unintended adverse impacts.

Mitigation measure Traffic-3 would reclassify 41st street as a "Collector Street" and requires its widening by 22 feet. However, 41st street west of the Project site is surrounded by residences and passes through a recreation center. Would this conversion to a collector street be accompanied by higher speeds? If so, the DEIR must evaluate the safety and desirability of such a change to this neighborhood.

Other mitigation measures are impermissibly deferred and this too violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4th 777, 793-94; Guidelines Section 15126.4(a)(1)(B).) CEQA requires all mitigation measures for a project to be formulated during the environmental review process so their efficacy can be analyzed in the EIR. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-670.) Courts have prohibited the deferral of mitigation measures because "[t]here cannot be meaningful scrutiny [of an environmental review document] when the mitigation measures are not set forth at the time of project approval." (*Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884.) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the "time of project approval." (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.)

Mitigation measure Utilities and Service Systems-1 requires the applicant to either "have further sewer system gauging obtained to identify specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the system with sufficient capacity." As this mitigation measure makes it clear that the necessary analysis has not yet been conducted, the DEIR proposes impermissibly deferred mitigation. The sewer gauging should be done prior to project approval so that the EIR may mitigate the potential impacts of constructing new sewer lines. At the very least, construction of new sewer lines requires ground disturbance and often impacts roads such that they must be closed during construction of sewer lines and afterward for repair. CEQA requires these impacts to be disclosed now.

IV. The Greenhouse Gas Analysis and Mitigation is Inadequate.

Based on the unsupportable conclusion that the Project will not generate significant greenhouse gas ("GHG") emissions, the DEIR fails to incorporate any mitigation measures for greenhouse gases. (DEIR p. I-12.) Given that the Project would construct nearly one-half million square feet of building space from raw materials, that it would require the use of electricity to operate, and that it would depend on trucks for the delivery of raw materials and the shipment of finished goods, this conclusion lacks substantial evidence. The DEIR must be revised to analyze the GHG emission that would be generated by the Project and to include specific and enforceable mitigation measures to

reduce those emissions. We hereby incorporate the comments submitted by the Center for Biological Diversity on the 2008 project proposed for this site.

V. The EIR's Air Quality Analysis Understates Project Impacts and the Project's Likely Impacts to Human Health.

CEQA requires environmental review of a Project's potentially adverse impacts on human beings. (Guidelines § 15065 subd. (a)(2).) The project site is located along the Alameda Corridor connecting the Ports of Los Angeles and Long Beach to downtown heavy rail lines and is heavily traversed by diesel trucks and railroads. Existing air quality is among the worst in the South Coast Air Basin, and childhood asthma rates far exceed the average. Under these existing conditions, any Project contributions to poor air quality are cumulatively considerable. "One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources." (*King County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692.) This is particularly true with regard to air quality.

The health hazards of poor air quality are well documented. Countless peer-reviewed studies have been published documenting the dangers of living near freeways due to their emissions of ultra fine diesel particulate matter and other air pollutants. Ultra fine particulate matter causes cardiovascular and neuron damage. (See http://www.arb.ca.gov/research/health/healthup/jan03.pdf; see also http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1002973, both incorporated by reference.) Life expectancy rises as fine particle pollution drops. (See, http://articles.latimes.com/2012/dec/04/science/la-sci-sn-fine-particle-pollution-20121204, citing Harvard School of Public Health Study published in *Epidemiology*.) More than 90 percent of the particles in diesel exhaust are ultra fine particles, which are easily inhaled into the lung. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Diesel particulate matter also contains gases such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons, increasing the hazards to human health. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Consequently, diesel particulate matter was declared a toxic air contaminant by the California Air Resources Board in 1998. According to the Air Resources Board, "Diesel particulate matter may cause cancer, premature death, and other health problems." (See http://www.arb.ca.gov/enf/hdvip/ccdet/saej1667.htm; see also,

http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.) These other health problems include asthma, bronchitis, and heart disease. (Miller et al., Long Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women, New England Journal of Medicine, 356:5 (2007) 447-458, available at http://burningissues.org/car-www/pdfs/miller-women-cv-NEJM4-2007.pdf, herein incorporated; see also http://www.ehib.org/page.jsp?page_key=90#pm_health.)

These pollutants have been correlated with asthma, congestive heart failure, autism, and other ailments, with the greatest impact on sensitive receptors such as children and the elderly, many of whom live near the Project site.

A study released just last week linked chronic exposure to microscopic air pollutants in vehicle exhaust, such as that experienced by the residents of this community, to deaths from heart disease. (Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort, Ostro et al., available online at http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/1/ehp.1408565.acco.pdf, herein incorporated.) According to the *Los Angeles Times*' coverage of the study, "The finding bolsters evidence that ultrafine particles... contributor to health problems among people living near traffic." (LA Times, Feb. 25, 2015 http://www.latimes.com/local/lanow/la-tiny-pollutants-linked-to-heart-disease-deaths-20150225-story.html .) Major roadways were among the most ubiquitous of hundreds of sources of ultrafine particle pollution examined in the study.

Given the environmental baseline, the DEIR's air quality analysis and health risk assessment are of particular importance to the City's evaluation of the Project and to the surrounding community. As the Project's truck trips will likely comprise the majority of the Project's air pollution emissions, these analyses are based on the developer's estimated numbers of daily truck trips. Unfortunately, the numbers reported appear to underestimate the Project's true contributions to poor air quality – and especially to diesel emissions – and therefore appear to understate the significance of the Project's air quality impacts.

The EIR assumes that the nearly one-half million square feet of industrial warehouse space will draw only 75 diesel trucks per day. By contrast, a similar, but slightly smaller project evaluated by the city in 2008 at the project site assumed generation of 264 truck trips per day. (Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR.) The DEIR fails to include sufficient information about the Project to justify the claimed 70 percent *reduction* in diesel truck trips that accompany the Project's 10 percent *increase* in size. The DEIR's analysis of air quality impacts and

health risks must be repeated in a revised DEIR that provides substantial evidence for its conclusions. This EIR must also include feasible and enforceable mitigation measures for the operation of the trucks. If this EIR purports to rely on cleaner technologies or other methods of shipping and receiving than diesel trucks, it must be demonstrated that these technologies and methods are both feasible and available to the Project.

VI. The EIR Fails to Adequately Consider the Project's Noise Impacts on Surrounding Residential Neighborhoods.

The Initial Study found the Project's noise impacts insignificant resulting in the DEIR's failure to analyze and mitigate the Project's noise impacts on the community. (Initial Study, Exhibit B, p. 116, 124.) However, this conclusion lacks substantial evidence. First, the project description provides insufficient information about the project to accurately evaluate its proposed noise impacts. This is important, given that homes are located within 153 feet of the Project site. The Initial Study contemplates heating and air conditioning equipment and traffic, but none of the operations of the proposed warehouse itself. (*Id.* at 124.) Second, existing community noise levels are so high that any additional noise levels are considered cumulatively considerable and require mitigation.

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches...Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances." (EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.)

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels. (See, World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Exposure to even

moderately high levels of noise during a single eight-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five to ten point increase in blood pressure. Over time, this noise-induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death. (World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health.

High noise levels also have dramatic developmental impacts on small children, many of whom might reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. Without mitigation, the Project might expose community members to levels of noise that are unsafe for cardiovascular health, mental health, societal well being, and child development.

The noise study performed with the Initial Study concluded that the existing ambient noise levels in the community already vastly exceed those at which residential development is permitted in the City of Los Angeles. (Initial Study, Exhibit B, pp. 118, 121.) The State of California does not consider areas with ambient noise levels above 60 dbA acceptable for residential use. (*Id.* at p. 118.) Multi-family residential uses are "normally acceptable" only below 65 dBA. (*Ibid.*) Residential uses up to 70 dBA are permitted only when precautions are taken to reduce indoor noise levels. (*Ibid.*) Even so, the noise study reported average ambient noise levels of 63-75 dBA Leq with maximum noise levels of up to 94 dBA Leq. If the Project will contribute to *any* increase in community noise levels, the Project will have significant cumulative impacts that must be disclosed, analyzed, and mitigated in the EIR. (*Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1026.) This EIR has failed to do so. The DEIR must be revised to include analysis of the proposed warehouse operations and to include specific, feasible and enforceable mitigation that protects sensitive receptors that reside as close as 153 feet away.

Conclusion

As proposed, the warehouse project would have significant and unavoidable

adverse impacts on a community already facing the noise and air pollution of the Alameda Corridor and the City's densest industrial development. Even so, the DEIR fails to consider alternatives to the Project such as a community garden that have broad community support and that would meet the City's economic objectives. Due to the deficiencies outlined above, the DEIR requires revision and recirculation. The South Central Farmers hope that the City's revised DEIR more accurately discloses, analyzes, and mitigates the Project's likely impacts and that it considers alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

Thank you for your consideration of these comments. We join in the comments submitted by the Natural Resources Defense Council and Public Counsel on this draft EIR and hereby incorporate them by reference. In addition, pursuant to Public Resources Code section 21092.2, we hereby request notice of all future meetings and environmental notices issued pursuant to CEQA at this site. We look forward to reviewing the revisions to this draft environmental impact report.

Sincerely,

Michelle N. Black

EXHIBIT 7

REPORT OF THE CHIEF LEGISLATIVE ANALYST

October 20, 2011

TO: Honorable Members of the Budget and Finance Committee

FROM: Gerry F. Miller
Chief Legislative Analyst

Council File No.: 11-1524
Assignment No.: 11-09-0790

Ordinance to Release a Pledge to Dedicate a Portion of the Lancer Property (41st and Alameda) in Exchange for Cash and Creating a Trust Fund for Retention and Disbursement of the Funds

SUMMARY

The Harbor Department requests that Council: (1) amend a previous Pledge Agreement (Agreement) entered into by the Harbor Department and Libaw-Horowitz Investment Company concerning the Property located at 41st and Alameda Streets in the Alameda Corridor (Property) in Council District Nine, and (2) adopt an Ordinance to establish a Trust Fund for the cash pledge. There is no impact the General Fund as a result of these actions.

As part of a litigation settlement between Libaw-Horowitz Investment Company and the Harbor Department, approved by Council on August 13, 2003 (C.F. 03-1642), a 2.6 acre portion of the Property was dedicated to the Department of Recreation and Parks (RAP) or a non-profit designated by Council District Nine for recreation and park purposes. On July 12, 2011, Council District Nine requested that the Harbor Board of Commissioners allow Libaw-Horowitz to rescind its pledge to dedicate the 2.6 acres and instead provide a cash pledge in the amount of $3,573,365 to improve and provide recreational facilities and programs within the vicinity of the Property (C.F. 11-1524).

According to the Council Office, since 2003 research has revealed the negative health impacts of air pollution on sensitive receptors. The Council Office believes that the Property would be better utilized as a garment design and manufacturing center to facilitate economic development in the area and make available up to 600 jobs for area residents (Attachment 1). The City Attorney reports that there is a buyer currently in escrow to purchase the entire Property from Libaw-Horowitz to construct this facility.

On August 4, 2011, the Board of Harbor Commissioners considered this request. According to the Harbor Department staff report released August 29, 2011, the Commission deferred this matter to the Council due to the following factors: (1) the Harbor Department is not the beneficiary of the Property and would not control the funds pursuant to the Cash Pledge; (2) the interests of this matter are wholly outside of the Harbor Department's jurisdiction, and (3) amendment of the Council-approved settlement would require Council approval and eventual adoption of an Ordinance to provide for administration of the funds (C.F. 11-1524).

On August 24, 2011 (C.F. 11-1524), the City Attorney submitted a draft Ordinance to (1) rescind the original Pledge Agreement; (2) amend the Pledge Agreement to provide for a cash pledge, and (3) create the Lancer Property Recreational Trust Fund to be administered by the Chief Legislative

Analyst. In addition to approval of the Ordinance, it is necessary that Council also authorize and direct the Board of Harbor Commissioners to rescind the previous Pledge Agreement and adopt the new Cash Pledge Agreement to allow the Harbor Department to take action on this matter.

With the assistance of RAP and the Housing Authority of the City of Los Angeles (HACLA), the Council Office has developed a list of park improvements at Pueblo Del Rio (a public housing development owned by HACLA), Fred Roberts Park and Ross Snyder Park that would receive funding from the Lancer Property Recreational Trust Fund. The Council Office has conducted community meetings at Pueblo Del Rio and Fred Roberts Park to gather input and feedback regarding the proposed improvements. It is anticipated that Ross Snyder park will receive a smaller portion of the funds to support programming only. Therefore, no community meetings were conducted. RAP has prepared a scope of work for all three locations which is included as Attachments 3,4, and 5 of this report.

To provide for implementation of the Lancer Property Recreational Trust Fund, we recommend that Council instruct this Office to work with Council District Nine and other appropriate City departments to establish a process for the implementation and payment of funds associated with the Cash Pledge Agreement as described in the draft Ordinance.

RECOMMENDATIONS

That the City Council:

1. Approve the Termination and Release of Pledge Agreement and Associated Cash Pledge of $3,573,365 between Libaw-Horowitz Investment Company and the Harbor Department (attached to the Harbor Commission report dated August 4, 2011, C.F. 11-1524).

2. Upon approval by the City Council, authorize and direct the Executive Director of the Board of Harbor Commissioners to execute, and the Board Secretary to attest, to:

    a. Termination and Release of Pledge Agreement between Libaw Horowitz Investment Co. and the Harbor Department; and,

    b. The associated Cash Pledge Agreement between Libaw Horowitz Investment Company and the Harbor Department.

3. Approve the draft Ordinance attached to the City Attorney report dated August 24, 2011 to (1) amend the previous Agreement entered into by the Harbor Department and Libaw-Horowitz Investment Company concerning the Lancer/21st and Alameda Property in Council District Nine to convert from land to cash, (2) adopt an Ordinance to establish the Lancer Property Recreational Trust Fund for the cash pledge ($3,573,365) to be used for park purposes in Council District Nine.

4. Instruct the Chief Legislative Analyst, with the assistance of Council District Nine, the Housing Authority of the City of Los Angeles, the Department of Recreation and Parks, and other departments as appropriate to establish a process for the implementation and payment of funds associated with the Cash Pledge Agreement.

ENVIRONMENTAL REVIEW

The City Attorney reports that the establishment of the Trust Fund is considered an administrative activity and is exempt from the California Environmental Quality Act in accordance with Article II Section 2(f) of the Los Angeles City CEQA Guidelines.

FISCAL IMPACT

There is no impact to the General Fund as a result of these actions. The City will receive $3,573,365 to be placed in the Lancer Site Recreational Improvements Trust Fund upon adoption of the proposed Ordinance.

Brian Randol
Analyst

Attachments:
1. Letter from Council District Nine Concerning Pledge Amendment
2. Background on Lancer Litigation
3. Estimated Cost for Pueblo Del Rio Improvements
4. Estimated Cost for Fred Roberts Park Improvements
5. Estimated Cost for Ross Snyder Park Improvements

JAN PERRY
COUNCILWOMAN
NINTH DISTRICT
PRESIDENT PRO TEMPORE

City Council
of the
City of Los Angeles
City Hall

ENERGY AND THE ENVIRONMENT
CHAIR

INFORMATION TECHNOLOGY &
GOVERNMENT AFFAIRS
VICE-CHAIR

HOUSING, COMMUNITY &
ECONOMIC DEVELOPMENT
MEMBER

PUBLIC SAFETY
MEMBER

July 12, 2011

Los Angeles Board of Harbor Commissioners
President Cindy Miscikowski
Vice President David Arian
Commissioner Robin Kramer
Commissioner Douglas P. Krause
Commissioner Kaylynn L.Kim.
425 S. Palos Verdes Street
San Pedro, CA 90731

Re: Amendment to Settlement of Libaw-Horowitz Investment Co. v. City of Los Angeles, Council File 03-1642

Dear Commissioners:

In 2003, the Harbor Department settled an action brought by Libaw-Horowitz Investment Company involving the Lancer Property, a roughly 14 acre parcel located at 41st and Alameda Streets in Council District Nine. The settlement was authorized by the City Council on August 13, 2003. Pursuant to the settlement agreement, the Harbor Department sold the Lancer property to Libaw-Horowitz subject to, and in conjunction with, Libaw-Horowitz' pledge to dedicate approximately 2.6 acres of the property back to the City of Los Angeles Department of Parks and Recreation (RAP), or alternatively, to a non-profit community organization that would use and maintain the property for recreation and park purposes. The Harbor Department's settlement and sale was challenged in a court action by community gardeners that were occupying the property at the time. That action finally concluded in January 2009 when the California Supreme Court declined to review the case.

Since the pledge agreement was authorized in 2003, there has been an emerging field of research regarding air pollutants and the harmful impacts they can have on sensitive receptors. Considering the health risk posed by diesel emissions, the propriety of establishing an active use park in the middle of this heavily industrialized corridor should be questioned and is the primary reason why I am requesting the Harbor Commission to consider amending the pledge agreement.

Currently, Libaw-Horowitz is in escrow with a buyer that proposes to build a design center on the Lancer property that will encompass garment design, manufacturing and warehousing and could potentially create up to 600 new jobs. The buyer's plans, however, require the entire Lancer property including the pledged 2.6 acres.

Considering the City's immediate need for jobs and tax revenues and the location of the site on the Alameda Corridor, I ask that the pledge agreement be amended, such that Libaw-Horowitz shall be relieved of its pledge to dedicate the 2.6 acres in exchange for a cash pledge.

CITY HALL • 200 NORTH SPRING STREET • SUITE 420 • LOS ANGELES, CA 90012 • (213) 473-7009
DISTRICT OFFICE • 4301 S. CENTRAL AVENUE • LOS ANGELES, CA 90011 • (323) 846-2651

TRANSMITTAL 1

The cash value of the release shall be equal to a pro-rata share based on acreage of the sale price that Libaw-Horowitz has agreed to with the current prospective buyer. The cash proceeds of the release shall be dedicated to a trust fund established by an ordinance and limited to use for recreation and parks purposes. The fund will be used to improve existing recreation facilities with capital improvements and programming and to create new recreation opportunities in the area adjacent to the Lancer site. Execution of the release and payment of the settlement funds shall not be contingent upon Libaw-Horowitz closing the pending sale or any future sale of the property.

Specifically, the first installment of funds in the approximate amount of $2.7 million will go towards recreation and parks capital improvements. There are multiple opportunities for investment in the local community parks where over 40% of area residents are under the age of 17 and live in high density conditions. There is public housing for more than 2,000 residents at Pueblo Del Rio in the immediate area of the Lancer site and the recreation and parks improvements could be implemented quickly there to improve access to much-needed recreational opportunities for families and children. Currently, I am working with RAP and the Housing Authority of the City of Los Angeles (HACLA) to develop a menu of recreation and park improvement options with associated costs to present to the Resident Advisory Committee (RAC). Pueblo Del Rio has an active RAC and that body will help the City ultimately decide what recreation and parks improvements will be made.

The second installment of funds in the approximate amount of $900,000 will be used to support programming activities at existing recreation and parks facilities in the vicinity of the Lancer site. These recreation facilities include but are not limited to Fred Roberts Park and Ross Snyder Park. These funds may also be used to support organizations who manage recreation activities.

Additionally, it should be noted that in partnership with my office and the Department of Water and Power the Los Angeles Community Garden Council has successfully established a new seven-acre garden with 190 plots at 110th Street and Avalon Boulevard. In fact, many of the community gardeners who gardened at the Lancer site have been able to locate here.

The Lancer property has a long history yet it remains one of the few large assembled, undeveloped properties in the City of Los Angeles. Amending the pledge agreement will allow the property to be fully utilized for job creation and provide support to existing recreation facilities. I will continue conversations with HACLA, RAP and community-based organizations; I know these funds can be used to improve and create recreation opportunities for the community in the vicinity of the Lancer site. I appreciate your consideration; should you wish to discuss this matter further, please contact me directly.

Sincerely,

Jan Perry
Councilmember, District Nine

cc: Deputy Mayor Larry Frank, Office of Mayor Villaraigosa
Gerry Miller, Chief Legislative Analyst
Kenneth Mattfeld, Deputy City Attorney
Tim Ison, Libaw-Horowitz Investment Co.

Background

According to the City Attorney, in 1986 the City acquired the Property through condemnation to construct a trash incinerator known as the Los Angeles City Energy Recovery (Lancer). The predecessor to Libaw-Horowitz Investment Company, Alameda-Barbara Investment Co., owned 11 of the 14 acres. Negotiations regarding the fair price to be paid for the parcel continued until 1990, when the LANCER project was abandoned.

In 1994, the City transferred the Parcel to the Harbor Department which reimbursed the City $13.3 million. The property was occupied by as many as 400 community gardeners who would later become the association known as South Central Farmers Feeding Families. By October 1996, a purchase and sale agreement was reached with Libaw-Horowitz (the new name for Alameda-Barbara Co.) and Harbor staff. According to the City Attorney, Libaw-Horowitz signed the agreement and Harbor staff indicated the agreement would be forwarded to the Harbor Commission and Council for approval. However, the Harbor Department did not process the agreement due to pending litigation brought by the State of California regarding use of Harbor Department trust funds. In 2001, the Harbor Department informed Mr. Horowitz that it decided not to sell the property but would instead offer it publicly for development under a long-term lease.

In 2002, Libaw-Horowitz filed suit against the City for breach of oral agreement and other associated causes of action. In July 2003, a settlement was reached that had the following provisions: (1) sale of the Parcel to Libaw-Horowitz for $5,050,000, (2) dedication of roughly 2.6 acres for recreation and parks purposes, (3) a sanitary sewer easement in favor of the City, and (4) dismissal of the claims. On August 13, 2003, the Council concurred with the Harbor Commission's actions of June 23, 2003 to approve the settlement (C.F. 03-1642).

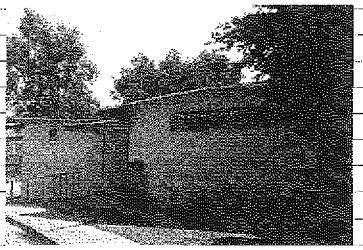
After the sale closed in December 2003, Libaw Horowitz gave notice to the Regional Food Bank that its month to month lease for gardening would be terminated. In February 2004, the South Central Farmers Feeding Families, along with individual plaintiffs, filed suit against Libaw-Horowitz and the City asserting various causes of action (including violation of due process). The City Attorney report states that these legal challenges were resolved in 2009 in favor of the City and Libaw-Horowitz when the California Supreme Court declined to hear the case.

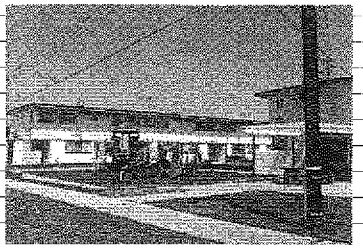
Before the Budget and Finance Committee today is a request to: (1) amend the previous Agreement entered into by the Harbor Department and Libaw-Horowitz Investment Company concerning the Property in Council District Nine to convert from land to cash, and (2) adopt an Ordinance to establish the Lancer Property Recreational Trust Fund for the cash pledge ($3,573,365) to be used for park purposes.

7/26/2011

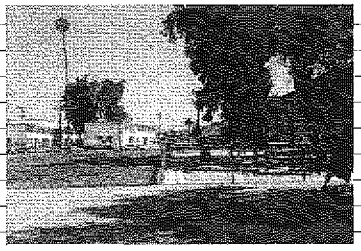
Pueblo Del Rio Housing - Parks Estimate

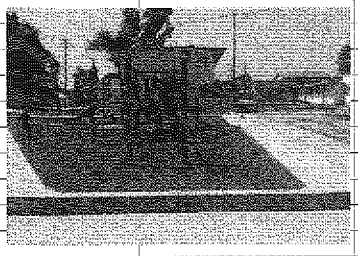
Description		Total
Project Related Costs		
Environmental (CEQA)	$	25,000
Survey	$	25,000
Design	$	175,000
Permits	$	20,000
Administration (project and construction oversight)	$	50,000
Subtotal	$	295,000
Direct Construction		
Playground (near bldg #47)	$	175,000
Exercise Equipment (near bldg #33)	$	125,000
Playground (near bldg #42)	$	250,000
Playground (near bldg #11)	$	175,000
Basketballl Court Renovations	$	20,000
Universal Access Playground (near Community Center)	$	800,000
Building Renovations (paint, restroom ada upgrades, kitchen upgrades, storefront windows at rollup doors, new roof, new interior lighting, new doors, repair roof termite damage)	$	400,000
Subtotal	$	1,945,000
Project Contingency	$	194,500
TOTAL PROJECT COST	$	2,434,500

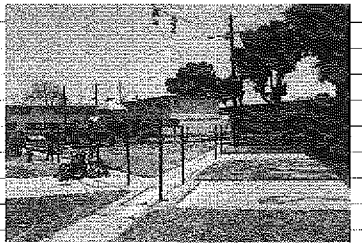








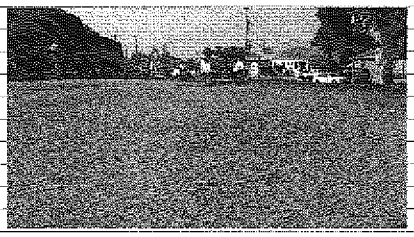




Fred Roberts - Synthetic Turf Soccer Field, Jogging Path, & Fitness Equipment

10/6/2011

Description		Total
Project Related Costs		
Environmental (CEQA)	$	9,000
Survey	$	9,000
Design	$	58,000
Permits	$	7,000
Administration (project and construction oversight)	$	20,000
Subtotal	$	103,000
Direct Construction		
New outdoor fitness equipment	$	50,000
Synthetic turf soccer field, including drainage	$	330,000
Shade structures (2) over bleachers	$	85,000
Aluminum bleachers (2)	$	10,000
Concrete jogging/walking path	$	48,000
Fencing and gates	$	37,000
Irrigation (new and modifications)	$	35,000
Subtotal	$	595,000
Project Contingency	$	72,000
TOTAL PROJECT COST	$	770,000





Ross Synder Additional Funding Needs Propsal

Program	Amount Propposed	Contibution Use discription
Part Time Recreation Assistant	$20,000.00 Annual Contibution	Part time salaries for rec. assistant
Afterschool Club Program	$2000 Annual Contribution	Supplies ie. Arts and Crafts,Balls, Board Games
Summer Day Camp	$1500 Annual Contibution	Camper Subsidy /Schlorships
Sports Program	$5000 Annual Contribution	Trophies and Uniforms/Supplies
Teen Program (Class)	$5000 Annual Contibution	Field Trip Admissions
	$47,0000 Total Annual Contibution	

ORDINANCE NO. 181949

An ordinance authorizing the Harbor Department of the City of Los Angeles to execute an agreement that will release Libaw-Horowitz Investment Company from its promise to dedicate a portion of the former Lancer property in exchange for a promise to donate cash, and creating a trust fund for the receipt and disbursement of said funds.

WHEREAS, in 2003, Libaw-Horowitz Investment Company executed a Pledge Agreement wherein it agreed to dedicate a certain parcel of land more particularly described therein to the City or, alternatively, to a tax-exempt, non-profit community organization selected by the Councilperson for the 9th District that would use and maintain the property for recreation and park purposes; and

WHEREAS, the City has concluded that the establishment of an active use park is no longer appropriate because of the parcel's location in an industrial corridor and, considering the City's immediate need for jobs and tax revenues, the City would prefer a cash donation in lieu of property with said donation to be used to improve existing public amenities in the surrounding community.

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. The execution of a Termination and Release of Pledge Agreement, which includes a Cash Pledge Agreement providing for the payment of $3,573,365.00 to the City of Los Angeles by Libaw-Horowitz Investment Company is hereby approved.

Sec. 2. A new Article 4.7 is added to Chapter 5 of Division 5 of the Los Angeles Administrative Code to read as follows:

CHAPTER 5, ARTICLE 4.7
LANCER SITE RECREATION IMPROVEMENTS TRUST FUND

Sec. 5.88. Lancer Site Recreational Improvements Trust Fund.

(a) There is hereby created and established within the Treasury of the City of Los Angeles a special trust fund to be known as the Lancer Site Recreational Improvements Trust Fund (the Fund).

(b) The purpose of the Fund shall be for the receipt, retention and disbursement of funds in the amount of $3,573,365.00, to be received pursuant to the Cash Pledge Agreement entered into between the City of Los Angeles and Libaw-Horowitz Investment Company, and any other money received or appropriated for the purposes of the Fund.

(c) The Fund shall be administered by the Office of the Chief Legislative Analyst. The Office of the Chief Legislative Analyst is hereby authorized to accept funds totaling $3,573,365 pursuant to the Cash Pledge Agreement.

(d) Expenditures from the Fund shall be authorized by the Chief Legislative Analyst after consultation with the Housing Authority, the Department of Recreation and Parks, and the Councilperson for the 9th District and approval by the City Council.

(e) Funds shall be used to create or make improvements to recreation and park facilities at the Pueblo Del Rio housing project, which improvements shall be selected from a list developed by the Pueblo Del Rio Resident's Advisory Council, and/or for recreational programming at facilities in the vicinity of the former Lancer property at 41st and Alameda Street including, but not limited to, the Fred Roberts Park and Ross Snyder Park.

(f) All interest or other earnings attributable to monies in the Fund shall be credited to the Fund. Monies not expended from the Fund in any fiscal year shall not revert to the Reserve Fund but shall remain in the Fund.

(g) The Office of the Chief Legislative Analyst shall report annually to the City Council regarding and identifying all receipts into the Fund and all expenditures out of the Fund and the purposes for such expenditures, until the money in the Fund is exhausted.

Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that the foregoing ordinance was passed by the Council of the City of Los Angeles at its meeting of NOV 15 2011.

JUNE LAGMAY, City Clerk

By _____
Deputy

Approved NOV 23 2011

_____
Mayor

Approved as to Form and Legality

CARMEN A. TRUTANICH, City Attorney
Thomas A. Russell, General Counsel

By _____
KENNETH F. MATTFELD
Deputy City Attorney

Date: August 29, 2011

File No. 11-1524

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MOTION

TO CITY CLERK FOR PLACEMENT ON NEXT REGULAR COUNCIL AGENDA TO BE POSTED #54

FEB 24 2012

On November 24, 2011, the Council approved Ordinance No. 181949 which authorized the creation of the Lancer Site Recreational Improvements Trust Fund (Fund) to create or make improvements to recreation and park facilities at the Pueblo Del Rio public housing development, Fred Roberts Park, and Ross Snyder Park in Council District Nine (C.F. 11-1524). The scope of work includes, among other items, new playground equipment and recreation center upgrades at Pueblo Del Rio, new outdoor sports equipment at Fred Roberts Park, and programming at Ross Snyder Park.

Funds in the amount of $3.58 million have been placed into the Fund for these improvements to be administered by the Chief Legislative Analyst (CLA). The Department of Recreation and Parks (RAP) currently has existing vendors and staff to manage these projects as part of the existing workload within the Department. The Council should authorize RAP to access these funds to allow this work to proceed in an expeditious manner. Consistent with adopted Ordinance No. 181949, the CLA would review and approve expenditures relative to these improvements.

I THEREFORE MOVE that the City Council:

1. Authorize the Controller, subject to approval of the Mayor, to transfer $3,580,000 from the Lancer Site Recreational Improvements Trust Fund 54E, Department 28, Revenue Code 5188 Misc – Others to the Recreation and Parks Grant Fund, as follows:

Project	Fund	Dept.	Account	Amount
Pueblo Del Rio Rec Building Refurbishment	205	88	88HMA3	$437,500
Pueblo Del Rio Outdoor Improvements	205	88	88HMA4	$1,649,700
Fred Roberts Outdoor Improvements	205	88	88HMA5	$1,292,500
Ross Snyder Programming	205	88	88HMA6	$200,300
			TOTAL	**$3,580,000**

2. Authorize the Department of Recreation and Parks, with the assistance of the Chief Legislative Analyst, to prepare any additional Controller instructions that may be necessary and make any technical corrections and/or changes that may be required to effectuate the intent of this Motion; and authorize the Controller to implement these instructions.

3. Instruct the Department of Recreation and Parks to submit quarterly status reports to the Chief Legislative Analyst regarding receipts and expenditures from the Fund and the purposes for such expenditures, until the Fund is exhausted.

4. Authorize the Chief Legislative Analyst to review and approve all expenditures pertaining to the Fund.

FEB 24 2012

PRESENTED BY _____
JAN PERRY
Councilmember, 9th District

SECONDED BY _____

ORIGINAL

BMR