APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals, use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☐ City Planning Commission (CPC) ☑ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: CPC-2017-1014-CU-ZAA-SPR

APN: _____

Project Address: 15116 - 15216 South Vermont Avenue; 747 - 861 West Redondo Beach Boulevard

Final Date to Appeal: July 3, 2025

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Advocates for the Environment, Dean Wallraff

Company/Organization: Advocates for the Environment

Mailing Address: 10211 Sunland Blvd.

City: Shadow Hills **State:** CA **Zip Code:** 91040

Telephone: (818) 650-0030 X101 **E-mail:** dw@aenv.org

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**

REPRESENTATIVE / AGENT INFORMATION

Name: _____

Company/Organization: _____

Mailing Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____ **E-mail:** _____

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☑ **Entire** ☐ **Part**

Are specific Conditions of Approval being appealed? ☐ **YES** ☑ **NO**

If Yes, list the Condition Number(s) here: _____

On a separate sheet provide the following:

☑ Reason(s) for the appeal

☑ Specific points at issue

☑ How you are aggrieved by the decision

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: _____ **Date:** 7/7/25

GENERAL NOTES

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.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: $178

Reviewed & Accepted by (DSC Planner): Jason Chan

Receipt No.: 200280142058 **Date:** 7/7/2025

☒ Determination authority notified ☒ Receipt Number

GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our Online Application System (OAS).

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

☐ Appeal Application

☐ Justification/Reason for Appeal

☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☐ *Aggrieved Party.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES

ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.

☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

May 13, 2025

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization

Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Via email and Fedex overnight.

Re: Appeal Justification for the Prologis Vermont and Redondo Project, SCH No. 2017121007

Dear City Council:

Please consider this letter as a formal notice and request for an appeal, of the Planning Commission's decision on May 8, 2025 to City Council, requesting the Council reject the Planning Commission's decision approving the Prologis Vermont and Redondo Project (**Project**) and certifying the Environmental Impact Report (**EIR**) for the Project. The Project Site is located on the intersection of Vermont Avenue and Redondo Beach Boulevard in the City of Los Angeles (**City**). The Project would construct and operate a 340,298 square foot industrial warehouse/manufacturing/high-cube warehouse/distribution center.

Advocates for the Environment submits the comments in this letter to provide specific reasons why the Project's Environmental Determination in the EIR, including the Greenhouse-Gas (**GHG**) analysis, was legally inadequate and not in compliance with the California Environmental Quality Act (**CEQA**). The Planning Commission abused its discretion in approving the Project because the City violated CEQA by failing to support its significance conclusions by substantial evidence, among other CEQA violations.

Background and Interest of Advocates for the Environment

Advocates for the Environment is a non-profit public-interest environmental law firm and advocacy organization, and part of its mission is to use appropriate legal tools to reduce GHG emissions of development projects. We reviewed the EIR prepared in August 2021, and the Final EIR released in March 2025, and submitted comments regarding the sufficiency of the EIR's GHG analysis on May 5, 2025. During the public hearing on May 8, 2025 at the City of Los Angeles Citywide Planning Commission, the Project was approved and the EIR was certified. Yet, this decision was erroneous and an abuse of discretion because the City did not support its significance conclusions and thresholds by substantial evidence.

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

Rationale for Appeal

The Planning Commission should not have approved this Project because the EIR violates CEQA. CEQA requires lead agencies to support their significance thresholds and significance determinations by substantial evidence. The City's determination that the Project would have a less-than-significant GHG impact was not supported by substantial evidence.

CEQA GHG Significance Analysis

The DEIR derived its GHG significance thresholds from the CEQA Appendix G Guidelines: whether the Project would "[g]enerate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment," and whether the Project would "[c]onflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases." (DEIR, p. IV.F-27.) The City used CalEEMod to quantify the Project's annual emissions, which were reported to be 17,850 metric tons carbon dioxide equivalent (**MTCO2e**) per year. (DEIR, Appendix C, p. 26.) The DEIR concluded that the Project's GHG emissions would be less than significant after mitigation. (DEIR, p. IV.F-51.) However, this significance conclusion is not supported by substantial evidence because the Project would conflict with applicable plans, policies, and regulations for reducing GHG emissions.

Consistency with Identified Applicable Plans

The DEIR analyzed consistency with the California Air Resources Board (**CARB**) Scoping Plans, the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (**Connect SoCal RTP/SCS**), the Los Angeles' Green New Deal (**LA Plan**), and the Los Angeles Green Building Code (**LA Green Building Code**). However, the DEIR overlooks the Project's conflict with the CARB Scoping Plans and fails to acknowledge and analyze all applicable GHG reduction plans.

The 2022 Scoping Plan places particular emphasis on decarbonizing industrial facilities by "displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions." (2022 CARB Scoping Plan, p. 208.) The Project does not appear to be consistent with this goal, based on the analysis provided in the DEIR. The 2022 Scoping Plan is undermined by the Project's heavy reliance on fossil fuels for its operations through the use of heavy-duty trucks and other mobile sources of GHG emissions.

The 2017 Scoping Plan was developed to help California comply with SB 32, which mandates a 40% reduction in GHG emissions below 1990 levels by 2030 (Health & Safety Code § 38566). The DEIR does not explain how the Project aligns with these objectives or the

2050 goal of reducing emissions by 80% below 1990 levels. Moreover, the 2017 Scoping Plan sets statewide per capita GHG emissions targets of 6 MTCO2e by 2030 and 2 MTCO2e by 2050 (CARB Scoping Plan, p. 99). The Project proposes to hire approximately 250 employees,[1] resulting in per-service population GHG emissions of at least 71.4 MTCO2e/capita. This significantly exceeds both the 2030 and 2050 targets.[2] Given that this reduction must be achieved within the Project's operational lifespan, it is evident that the Project will remain inconsistent with the 2017 Scoping Plan's long-term goals. Therefore, the Project's GHG impact is significant under the second threshold because it directly conflicts with established plans for reducing GHG emissions.

The DEIR should have analyzed all applicable plans

The City chose, as its second GHG threshold, whether the Project would "[c]onflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases." (DEIR, p. IV.F-27.) This language requires that the DEIR analyze the Project's consistency with *all* other applicable plans, not just the plans that the City prefers to analyze.

An agency must consider a project's GHG impact over time to reasonably evaluate the full extent of environmental impact as CEQA requires. The City estimated that the Project lifespan would be 30 years, as indicated by the 30-year amortization period. (DEIR, p. IV.F-50.) Accordingly, the Project must show consistency with long-term State GHG goals for at the Project's entire lifespan to comply with CEQA. In particular, the DEIR must also demonstrate consistency with Executive Order B-55-18 (**EO B- 55-18**).

EO B-55-18 requires the State of California to achieve carbon neutrality—net zero GHG emissions—by 2045. The Project is inconsistent with EO B-55-18 because it does not prohibit the use of gasoline, diesel, and natural gas. In fact, the Project would use gasoline and diesel-powered vehicles (*See* DEIR, p. IV.F-30.) Burning such non-renewable fuels results in substantial GHG emissions, preventing the Project from ever achieving carbon neutrality, unless it enters into agreements with the applicant and/or future tenant to ensure that fossil fuel use is on track to be eliminated by 2045. Additionally, the Project is expected to involve truck fleets, which are included in the estimated 768 vehicle trips per day, contributing to substantial use of non-renewable, GHG-emitting fuels. (DEIR, Appendix C GHG Modeling, p. 31.) Thus, the Project would conflict with EO B-55-18.

Consequently, the Project would have a significant GHG impact under the second threshold because it is inconsistent with applicable plans for the reduction of GHGs.

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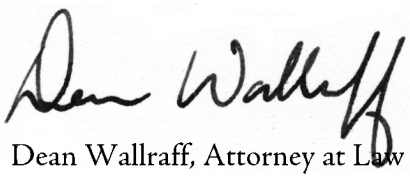
[1] The Project is anticipated to provide up to 250 jobs. (DEIR, p. IV.F-41.)
[2] $17{,}850\ MTCO2e\ per\ year \div 250\ employees = 71.4\ MTCO2e/service\ population.$

Conclusion

For the foregoing reasons, the EIR violated CEQA. In particular, the EIR failed as an informational document for decision makers and the public, the significance analysis was inadequate, and the City should have concluded that the Project would contribute to a significant GHG impact.

Thus, the Planning Commission should have rejected the Project and declined to certify the EIR, or at least should have continued the Project for another date if and until the GHG analysis is amended in conformance with CEQA.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: JUNE 18, 2025

Case No.: CPC-2017-1014-CU-ZAA-SPR Council District: 15 – McOsker
CEQA: ENV-2017-1015-EIR; SCH No. 2017121007
Plan Area: Harbor Gateway

Project Site: 15116 – 15216 South Vermont Avenue;
747 – 861 West Redondo Beach Boulevard

Applicant: Prologis LP, Tunde Ogunwole
Representative: Mayor Brown, LLP, Edgar Khalatian

At its meeting of **May 8, 2025,** the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

The Prologis Vermont and Redondo Project (Project) includes the construction, use, and maintenance of a one-story, 53-foot tall, 340,298 square-foot warehouse/manufacturing/ high-cube/warehouse/distribution center, including a 25,000 square-foot mezzanine and up to 40,000 square feet of incidental office uses. The Project also includes a total of 194 automobile surface parking spaces, 36 dock high truck loading positions, and surface parking for up to 71 truck trailers.

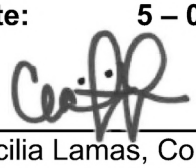
1. **Found**, that the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report No. ENV-2017-1015-EIR (SCH No. 2017121007), dated August 2021 and the Final EIR, dated March 2025 (collectively, the Prologis Project EIR), as well as the whole of the administrative record.
   CERTIFIED that:
   a. The Prologis Vermont and Redondo Project EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
   b. The Prologis Vermont and Redondo Project EIR was presented to the City Planning Commission as a decision- making body of the lead agency; and
   c. The Prologis Vermont and Redondo Project EIR reflects the independent judgment and analysis of the lead agency.
   ADOPTED the following:
   a. The related and prepared Prologis Vermont and Redondo Project Environmental Findings;
   b. The Statement of Overriding Considerations; and
   c. The Modified Mitigation Monitoring Program prepared for the Prologis Vermont and Redondo Project EIR.
2. **Approved**, pursuant to Section 12.24 U.14 of the Los Angeles Municipal Code (LAMC), a Conditional Use Permit for a Major Development Project which creates 250,000 square feet or more of warehouse floor area;
3. **Dismissed as not necessary**, pursuant to LAMC Sections 12.24 W.27 and 12.22 A.23, a Conditional Use Permit for a Commercial Corner Development in the M Zone to allow:
   a. 24-hour operations, in lieu of the otherwise permitted hours of operation from 7 a.m. to 11 p.m.; and

   b. The exterior walls and doors of the ground floor fronting adjacent streets to consist of a minimum of 10 percent transparent windows, in lieu of the otherwise required minimum 50 percent;
4. **Approved**, pursuant to LAMC Section 12.28 A, an Adjustment to allow for a maximum building height of 53 feet, in lieu of the otherwise permitted 45 feet in the M2-1VL-O Zone;
5. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a development which results in an increase of 50,000 gross square feet or more of non-residential floor area;
6. **Adopted** the attached Modified Conditions of Approval; and
7. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Newhouse
Second: Diaz
Ayes: Cabildo, Lawshe, Mack
Absent: Choe, Klein, Saitman, Zamora

Vote: 5 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is appealable to the Los Angeles City Council within **15 days** after the mailing date of this determination letter. Any Appeal not filed within the 15-day period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles, CA 90012; or 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401.

FINAL APPEAL DATE: JULY 3, 2025

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

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.

Attachments: Modified Conditions of Approval, Amended Findings, Appeal Filing Procedures

cc: Milena Zasadzien, Principal City Planner
Mindy Nguyen, Senior City Planner
Jason McCrea, City Planner
Kiersten Turner, Planning Assistant

CONDITIONS OF APPROVAL

(As Modified by the City Planning Commission at its meeting on May 8, 2025)

Pursuant to LAMC Sections 12.24 U.14, 12.24 W.27, 12.28 A, and 16.05, the following conditions are hereby imposed upon the use of the subject property:

Conditional Use - Major Development Project Conditions

1. **Site Development.** The use and development of the Property shall be in substantial conformance with the plans stamped Exhibit A, dated April 28, 2025. No change to the plans will be made without prior review by the Department of City Planning, Major Projects, and written approval by the Director of Planning. 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. The Project shall be in substantial conformance with the following project description:

    a. A one-story, 340,298 square-foot warehouse/manufacturing/high-cube/warehouse/ distribution center, including a 25,000 square-foot mezzanine and up to 40,000 square feet of incidental office uses, as well as 36 dock high truck loading positions and 71 parking stalls for truck trailers.

2. **Permitted Uses.** The Project shall be limited to the following uses, as defined in the Institute of Transportation Engineers (ITE) Trip Generation Manual: Warehousing (ITE 150), Manufacturing (ITE 140), High-Cube Warehouse/Distribution Center (ITE 152), and High Cube Transload & Short-Term Storage Warehouse (ITE 154). Additional permitted uses may be authorized upon approval from the Department of City Planning through the Plan Approval process (LAMC Section 12.24 M), under the authority of the City Planning Commission, in conjunction with appropriate environmental review and CEQA compliance.

3. **Pedestrian Amenities.** The following amenities shall be provided in substantial conformance with Exhibit A, dated April 28, 2025.

    a. Outdoor seating areas, including tables, along and around the pedestrian pathways throughout the site and within the landscaped area at the northwest portion of the site.

    b. A pedestrian pathway shall be provided along the southern portion of the proposed building, adjacent to automobile parking spaces to provide safe pedestrian access to the building entrances from Orchard Avenue and Vermont Avenue..

4. **Community Complaint Line.** The property owner/operator shall identify a contact person and provide a 24-hour “hot line” telephone number for any inquiries or complaints from the community regarding the subject facility. Prior to the utilization of this grant, the phone number shall be posted on the site so that is readily visible to any interested party. The hot line shall be:

    a. Posted at the entry, and the cashier or customer service desk,

    b. Provided to the immediate neighbors, schools and the Neighborhood Council, and

    c. Responded to within 24-hours of any complaints/inquiries received on this hot line.

    The property owner/operator shall document and maintain a log of complaints received, the date and time received and the disposition of the response.

5. **Semi-Truck Bay Usage.**
   a. **Permitted Hours.** A minimum of 25 percent of the truck unloading/loading bays shall not be utilized for unloading/loading between the hours of 10 PM to 5 AM.

   b. **Truck Trip Cap.** The number of truck trips permitted during the hours of 10 PM to 5 AM shall be limited to 105 trips.

Adjustment Conditions

6. **Building Height.** The Project shall be permitted a maximum building height of 54 feet.

Site Plan Review Conditions

7. **Site Development.** The use and development of the Property shall be in substantial conformance with the plans stamped Exhibit A, dated April 28, 2025. No change to the plans will be made without prior review by the Department of City Planning, Major Projects, and written approval by the Director of Planning. 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. The Project shall be in substantial conformance with the following project description: a one-story, 340,298 square-foot warehouse/ manufacturing/high-cube/warehouse/distribution center, including a 25,000 square-foot mezzanine and up to 40,000 square feet of incidental office uses, as well as 36 dock high truck loading positions and 71 parking stalls for truck trailers.

8. **Landscaping.** Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Department of City Planning for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A, dated April 28, 2025.

9. **Tree Maintenance.** New trees planted within the public right-of-way shall be spaced not more than an average of 30 feet on center, unless otherwise permitted by the Urban Forestry Division, Bureau of Public Works.

10. **Utilities.** All utilities shall be fully screened from view of any abutting properties and the public right-of-way.

11. **Signage.** There shall be no off-site commercial signage on construction fencing during construction.

12. **Fencing/Walls.** The Project shall include a minimum 18-foot tall concrete masonry unit (CMU) or concrete walls immediately north, east, and west of the loading area, as depicted in Exhibit A, dated April 28, 2025, to shield surrounding uses from noise relating to loading dock activities. Prior to the issuance of a building permit, the Applicant shall submit additional wall plan details for the review and approval by the Department of City Planning to ensure proper screening of the walls with murals and/or landscaping to minimize aesthetic impacts.

13. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

a. Areas where nighttime uses are located shall be maintained to provide sufficient illumination of the immediate environment so as to render objects or persons clearly visible for the safety of the public and emergency response personnel.

b. All pedestrian walkways, storefront entrances, and vehicular accessways shall be illuminated with lighting fixtures.

c. Light fixtures located on the Project Site (and not in the public right-of-way) shall be harmonious with the building design. Wall mounted lighting fixtures to accent and complement architectural details at night shall be installed on the building to provide illumination to pedestrians and motorists.

14. **Construction Equipment and Generators.** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. Construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. The Project construction contractor shall use on-site electrical sources and solar generators to power equipment rather than diesel generators, where feasible. One charging station for electric-powered off-road equipment shall be installed prior to the issuance of building permit.

15. **Mechanical Equipment.** All mechanical equipment shall be fully screened from view of any abutting properties and the public right-of-way.

16. **Trash/Storage.** All trash collecting and storage areas shall be located on-site and not visible from the public right-of-way. Trash receptacles shall be enclosed and/or covered at all times. Trash/recycling containers shall be locked when not in use.

17. **Graffiti Removal**. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

18. **Transportation Demand Management (TDM) Program.** The Project shall prepare and submit a draft TDM Program to LADOT for review prior to the issuance of the first building permit for this project. A final TDM Program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. As recommended by the May 14, 2020, transportation analysis, the TDM Program could include, but is not limited to the following:

a. An on-site Transportation Information Center (TIC) where employees, and visitors can obtain information regarding public transit, ridesharing, van pool providers, bicycle facilities, and bicycle safety;

b. A Transportation Coordinator responsible for implementing, maintaining, and monitoring the TDM Program;

c. Carpool/Rideshare Matching Program which would provide rideshare matching services and preferential parking for commercial employees commuting to work in employer-registered carpools;

d. Transportation Subsidy which would offer discount transit passes to employees who do not purchase monthly automobile parking at the Project Site;

e. Unbundled parking from the commercial leasing cost;

f. Convenient and secure bicycle storage within a bicycle locker, an attended cage, or a

secure parking room;

g. On-site lockers for employees who bicycle or use another active means of getting to work;

h. Make a one-time fixed-fee contribution of $50,000 prior to the issuance of the first certificate of occupancy for the project to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the proposed Project area;

i. In order to support LADOT's Mobility Hub Program, the developer shall make a onetime contribution of $50,000 prior to the issuance of the first certificate of occupancy.

j. A Covenant and Agreement to ensure that the TDM program will be maintained.

19. **Orchard Avenue and Redondo Beach Boulevard Physical Improvements.** The Applicant shall restripe the southbound approach of the Orchard Avenue/Redondo Beach Boulevard intersection to provide one left-turn lane and one right-turn lane.

20. **Vermont Avenue and Redondo Beach Boulevard Physical Improvements**. The Applicant shall install a public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection.

21. **Vermont Avenue Pedestrian Rail Crossing**. The Applicant shall install a pedestrian rail crossing to provide a connection to the sidewalk north of the property on Vermont Avenue.

22. **Traffic Signal Upgrades.** In order to upgrade the traffic signal systems in the project study area, the developer is proposing to make a financial contribution of $100,000 to the Department of Transportation ATSAC fund prior to issuance of the first certificate of occupancy. The traffic signal upgrades may include new traffic signal controllers, CCTV Cameras, roadway system loops.

23. **Site Access and Internal Circulation.** The Applicant shall consult with LADOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final LADOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to LADOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety. In order to minimize and prevent last minute building design changes, the applicant should contact LADOT, prior to the commencement of building or parking layout design effort, for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. New driveways should be dimension per the Department of Public Works Case 2 design standard with respective 30-foot and 16-foot widths for two way and one-way operations. Site access shall include the following features, subject to LADOT review:

a. Along Orchard Avenue, trucks may only access in and out of the site at the northerly driveway. The site shall maintain adequate space for four trucks to queue on-site at the Orchard Avenue driveway.

b. Along Vermont Avenue, trucks may only exit turning right, going north of the bus shelter and intersection. The site shall maintain adequate space for three trucks to

queue on-site at the Vermont Avenue driveway.

c. Along Redondo Beach Boulevard, no truck entry or exit is permitted.

24. **Trash and Recycling.**

a. All trash collection and storage areas shall be located on-site and shall not visible from the public right-of-way.

b. Trash receptacles shall be stored in a fully enclosed building or structure, constructed with a solid roof, at all times.

c. The property owner/operator shall be responsible for maintaining free of litter the area adjacent to the premises over which they have control, including the sidewalks bordering the site

25. **Mechanical and Rooftop Equipment Screening.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way.

Environmental Conditions

26. **Implementation**. The Mitigation Monitoring Program (MMP), attached as Exhibit C, and as amended by the CPC on May 8, 2025, specifically N-PDF-5, and part of the case file, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project Design Features (PDF) and Mitigation Measure (MM) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

27. **Construction Monitor.** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

28. **Substantial Conformance and Modification.** After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

29. **Inadvertent Discovery of Tribal Cultural Resources.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities (demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the project site), the potential tribal cultural resources shall be properly assessed and addressed pursuant to the process set forth below:

    a. Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find, i.e. within a radius of 60 feet, and contact the following:
        i) all California Native American tribes that requested consultation on the proposed project; and
        ii) the Department of City Planning.

    b. The applicant shall retain a qualified archaeological monitor, identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.

    c. If the archaeological monitor determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the Applicant shall consult with the archaeological monitor and with the Gabrieleño Band of Mission Indians – Kizh Nation tribe on the recommended disposition and treatment of any Tribal Cultural Resource encountered during all Ground Disturbing Activities.

    d. The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

    e. The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the Gabrieleño Band of Mission Indians – Kizh Nation tribe that have been reviewed and determined by the qualified archaeologist to

be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities in the vicinity of the find (i.e. within a radius of 60 feet) until this plan is approved by the City.

f. If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by the Gabrieleño Band of Mission Indians – Kizh Nation tribe, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

g. The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by the Gabrieleño Band of Mission Indians – Kizh Nation tribe and determined to be reasonable and appropriate.

h. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

30. **Inadvertent Discovery of Human Remains.** In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

a. Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

b. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

c. The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

d. The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

e. If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

31. **Inadvertent Discovery of Archaeological Resources.** In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. The applicant shall notify the City and consult with

a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified archaeologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible by the qualified archaeologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

32. **Inadvertent Discovery of Paleontological Resources.** In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible by the qualified paleontologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Administrative Conditions of Approval

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

34. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.

35. **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 assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.

36. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.

37. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

38. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.

39. **Project Plan Modifications.** Any corrections and/or modifications to the project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a

change in Site Plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.

40. **Indemnification and Reimbursement of Litigation Costs.** The 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 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.

(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 $50,000. 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.

41. 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 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.

FINDINGS

(As Amended by the City Planning Commission at its meeting on May 8, 2025)

ENTITLEMENT FINDINGS

Conditional Use Findings - Major Development Project

The following are the required findings for a Major Development Project which creates 250,000 square feet or more of warehouse floor area, as required by LAMC Sections 12.24 E and 12.24 U.14.

It should be noted that while the request also included a Conditional Use for a Commercial Corner Development in the M Zone to allow 24-hour operations and 10 percent transparency of the ground floor fronting adjacent streets, upon further consideration, it was determined that the Project Site does not meet the definition of a Commercial Corner Development as a commercially used corner lot located in the M2-1VL Zone which adjoins is located across the street from an R-zone lot, or lot improved with any residential use (except in an M Zone). As such, this entitlement request is recommended to be **dismissed as unnecessary**. Any office use proposed would be incidental to the warehouse use.

1. **The Project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

   The Project Site is located in an urbanized area, known as the Harbor Gateway North neighborhood, and is generally surrounded by a mix of medium- to low-medium density residential, commercial, light industrial and institutional uses. The property to the north, across a railroad right-of-way for a freight line, is the Rosecrans Recreation Center, which is designated for Open Space uses and zoned OS-1XL. Properties to the east, across Orchard Avenue, consist of a shopping complex and an open-air trash transfer/recycling center, immediately to the northeast, both are designated for Light Industrial uses and zoned M2-1VL-O. Properties to the south, across Redondo Beach Boulevard, include one- and two-story, single- and multi-family dwellings that are designated for Low and Medium Residential uses and zoned R1-1 and R3-1, respectively. The property at the southeast corner of Vermont Avenue and West Redondo Beach Boulevard is developed with a gas station. The City of Gardena immediately abuts the site to the west. Properties within the City of Gardena limits, across Vermont Avenue and the railroad right-of-way, are designated for General Commercial land uses and are zoned C3. The property at the southwest corner of Vermont Avenue is the Hustler Casino. The property directly to the northwest of the site is the Kei-Ai Southbay Healthcare Center (rehabilitation facility). One block further to the west, west of Berendo Avenue, is the Memorial Hospital of Gardena. First Southern Baptist Church and Amestoy Elementary School are located in the vicinity across Vermont Avenue to the northwest.

   The Project includes the construction, use, and maintenance of a one-story, 53-foot tall, 340,298 square-foot warehouse/manufacturing/ high-cube/warehouse/distribution center, including a 25,000 square-foot mezzanine and up to 40,000 square feet of incidental office uses. The Project also includes a total of 194 automobile surface parking spaces, 36 dock high truck loading positions, and surface parking for up to 71 truck trailers.

   The Project will provide modern warehouse/manufacturing/high-cube warehouse/ distribution center in an industrial-based employment area, meeting the needs of the industry and locating jobs near residential areas. Moreso, the Project would support the use of clean energy with the installation of 12 electric charging stalls for electric passenger

vehicles, and 33 electric vehicle supply equipment (EVSE) stalls for passenger vehicles, thereby reducing negative air quality impacts associated with operation of the Project. Additionally, the Project would enhance the built environment by providing native landscaping trees on-site and within the adjacent right-of-way, which would provide pedestrians shade and protection from the natural elements while creating curb appeal that would enhance the pedestrian experience as compared to the existing conditions. The proposed Project would also provide public infrastructure improvements by installing a new public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection.

The Project's 24-hour operation will enable the facility to function during off-peak hours, minimizing potential traffic-related impacts, and to balance the critical goods movement function while avoiding a concentration of activity, such as trucks, during school hours, stagger employee shifts to avoid potential complications from a shift schedule similar to other industrial uses in the area, and also provide greater flexibility for vehicles arriving from the port or other facilities to better distribute truck traffic and avoid overconcentration. The Project has been designed and conditioned to minimize noise impacts from the 24-hour operations such that it would not adversely impact the surrounding residential neighborhood.

The Project Site is approximately 15 acres in size, and the proposed 340,298 square-foot warehouse/manufacturing/high-cube warehouse/ distribution center, would be located at the center of the Project Site, away from the nearest residential uses to the south. Further, loading docks would be located on the northern elevation and would be no closer than 300 feet from residential and open space uses to the north; and an 18-foot CMU sound wall would be installed along the northern property line to reduce noise that is generated from operations and prevent noise pollution from impacting adjacent properties, thereby reducing impacts to the current noise quality of the community. Additional 18-foot-high concrete walls are also proposed immediately east and west of the loading area. As conditioned, the walls would be landscaped and/or include a mural. Landscaping to the northern end of both Vermont Avenue and Orchard Avenue would also provide additional screening. Landscaping along Vermont Avenue would occur extend approximately 235 feet east to the screened yard; and landscaping along Orchard Avenue would occur adjacent to the proposed water basin on the northeast corner of the Project Site.

Therefore, the Project will enhance the built environment in the surrounding neighborhood and will perform a function that is essential and beneficial to the region.

2. The Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The Project Site is located in an urbanized area, known as the Harbor Gateway North neighborhood, and is generally surrounded by a mix of medium- to low-medium density residential, commercial, light industrial and institutional uses

Surrounding development ranges from single stories to four stories, with taller buildings immediately to the west in the City of Gardena. The residential structures to the south range from one to three stories or approximately 40 feet, with allowed projections exceeding the 45-foot limit pursuant to LAMC Section 12.21.1 B.3, functionally appearing as larger buildings due to parapets and other permitted appurtenances. Further to the south are single family homes. To the east are industrial buildings, ranging in height from single story buildings to 32 feet, with similar rooftop projections. Buildings to the west are located in the

City of Gardena, and are approximately 45 feet in height. Buildings to the north are generally single-story, single-family homes.

The Project Site is zoned M2-1VL-O for which, pursuant to LAMC 12.21.1 A.1, the maximum height permitted for structures in the M2-1VL Zone is 45 feet. The Applicant is requesting relief from LAMC Section 12.21.1 A.1 to allow a 53-foot building height in lieu of the otherwise permitted 45 feet.

The proposed building would be developed with a warehouse/manufacturing/high-cube/warehouse/distribution center use which require substantially tall ceilings in order to accommodate industrial-sized machinery and equipment as well as storage of industrial and shipping goods.

As discussed above, there are existing industrial and commercial businesses to the east of the Project Site, and an active railroad right of way separating open space and residential uses to the north. Thus, the Project would complement existing uses and would not introduce an incompatible use to the area. The Project Site's proximity to the I-110 freeway would allow trucks to enter and leave the warehouse without traveling through residential areas.

In conjunction with the requested Adjustment, the proposed building will have a maximum height of 53 feet, which exceeds the height limit permitted by the site's underlying zone and height district and would be taller than the structures to the east and south. However, it would still be compatible with the neighborhood and surrounding area, as the new building would be constructed so that it is integrated into the existing fabric of the neighborhood and surrounding buildings through the use of articulation and shading to break down the mass of the building. Articulation would also be achieved through use of color, texture, and other façade treatments.

The Project has also been designed to minimize the warehouse's impact on surrounding residential and commercial properties. The Project Site is approximately 15 acres, while the footprint of the Project would consist of 340,298 square feet (approximately eight acres), concentrated in the center of the Project Site, away from the residential uses to the south. Additionally, the Project does not propose substantial light sources that may negatively impact surrounding residential properties. All new outdoor lighting required for operation of the Project will be shielded and directed towards the interior of the Project Site, such that the light source does not Project directly upon any adjacent property. Any glass used in building facades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare by minimizing the use of glass with mirror coating.

Furthermore, the Project would incorporate design features and attributes promoting energy efficiency and sustainability, such as focusing glazing primarily at potential office locations in the facility, thereby reducing energy loss and heat gain in the building overall, designing and building to meet the standard for LEED Silver Certification, and installing a solar photovoltaic (PV) system to offset energy demands of the office portion of the use, to generate a minimum of 460,000 kilowatt-hours per year (kWh/yr) of renewable electricity.

The Project would also consolidate the number of driveways providing access to the Project Site from the existing eight driveways to four driveways, which includes two driveways along Orchard Street, one driveway on Vermont Avenue, and one driveway on Redondo Beach Boulevard. In addition, the Project will install a new rail crossing arm at the outbound lane of the northerly Vermont Avenue driveway to prevent vehicles exiting the Project Site from bypassing the existing arm at northbound Vermont Avenue, which would minimize any potential adverse impacts to traffic the Project may have. As conditioned, the Los Angeles

Department of Transportation (LADOT) has also required a Transportation Demand Management program, restriping of Orchard Avenue, and a payment of $100,000 to the LADOT Advanced Transportation System and Coordination (ATSAC) fund. Additionally, a Transportation Demand Management (TDM) program would be implemented in order to reduce vehicular traffic generated by people traveling to and from the site, which includes transit information and promotions, a carpooling program for employees, flexible/alternative work schedules, and parking cash-out programs.

Further, sidewalks would be constructed along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue. All current site access points will be closed, with sidewalk, curb, and gutter reconstructed to the City of Los Angeles' current standards. The Project would improve the pedestrian circulation in the area by providing a rail crossing north of the Project Site along Vermont Avenue, connecting sidewalks on either side of the divided Vermont Avenue; and support multiple modes of transportation and increases connectivity for all Angelenos by installing a new bus turn-out and shelter, improving walking conditions for pedestrians with sidewalk widening and the addition of street trees, and providing 32 bicycle parking stalls.

The proposed warehouse use is permitted in the underlying zone, and has been designed and conditioned to minimize any potential impacts associated with these features and use. Therefore, the Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood or the public health, welfare, and safety.

As proposed, the Project includes the following features that would ensure that any the proposal would not negatively impact nearby properties, such as requiring any loading or unloading activities be located along the north side of the Project Site adjacent to the Union Pacific right-of-way, out of view from the public right-of-way, and not within 300 feet of the nearest residence; and the construction of an 18-foot CMU wall that would be constructed along the northerly property line. Additional 18-foot-high concrete walls are also proposed immediately east and west of the loading area all of which would be landscaped and/or include a mural. Landscaping and additional trees along the new sidewalks, would serve to maintain privacy and further reduce any visual and/or noise impacts on abutting residential properties and the surrounding neighborhood.

Therefore, the Project will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

3. The Project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

General Plan Land Use Designation

The Project Site is located within the Harbor Gateway Community Plan, which is one of the 35 community plans that comprise the Land Use Element of the General Plan, and which designates the entirety of the Project Site for Light Industrial land uses corresponding to the M2, MR2 and P Zones. The Project Site is presently zoned M2-1VL-O and is therefore consistent with the range of zones permitted under the land use designation.

General Plan Text

The Los Angeles General Plan sets forth goals, objectives and programs that guide both Citywide and community-specific land use policies. The General Plan is comprised of a range of State-mandated elements, including, but not limited to Housing and Conservation,

Land Use, Noise, Safety, and Transportation. The City's Land Use Element is divided into 35 Community Plans that establish parameters for land use decisions within those sub-areas of the City. The Project directly supports the intent and provisions of the applicable General Plan Elements, including the Framework Element, Mobility Element, Health and Wellness Element, Air Quality Element, Sewerage Facilities Element, and the Central City North Community Plan. The Project would otherwise not conflict with or be applicable to other General Plan goals or provisions.

Framework Element

The Framework Element of the General Plan will be implemented by the recommended action herein. The Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. The Framework Element established that areas with an Industrial Land Use Designation provide job opportunities for the City's residents and help maintain the City's fiscal viability. Therefore, the Framework Element calls for the retention of existing industries and the establishment of new industries. The Project is consistent with the objectives and policies of the Framework Element as described below:

Chapter 3: Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to encourage the development of environmentally sensitive new industrial uses and structures. The Project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of environmentally sensitive new industrial uses that balance protection of existing residential areas, and enhancement of commercial corridors. Specifically, the Project would be consistent with the following goals, objective and policies, as set forth in the General Plan Framework Land Use Chapter:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

> ***Objective 3.1:*** *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*
>
> > ***Policy 3.1.1:*** *Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.*

Goal 3J: *Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.*

> ***Objective 3.14:*** *Provide land and supporting services for the retention of existing and attraction of new industries.*

Policy 3.14.1: *Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans.*

Policy 3.14.9: *Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.*

The proposed development of the site as a warehouse/manufacturing/high-cube warehouse/distribution center is consistent with and permitted by-right in the M2 Zone. The Project would retain industrially zoned land and develop a new industrial use adjacent to existing industrial uses.

The Project includes development of an industrial building that could house a warehouse/ manufacturing/high-cube/warehouse/distribution center on a site that is directly adjacent to the I-110 freeway, one block to the east, and one of the few large vacant parcels with close proximity to a freeway and the Port of Los Angeles and Port of Long Beach. As the site is located so closely to transportation infrastructure, trucks visiting the Project would be able to avoid residential neighborhoods and other sensitive uses located farther from the freeway and provide a more efficient means to transport and store goods that are removed in and out of the region. Further, locating the proposed industrial use as close to these industrial centers as community plans and zoning allow will reduce truck trips and improve goods movement generally, thereby reducing impacts related to vehicle miles traveled in the region and supporting the needs of local residents. Additionally, the development of the site in a manner that is consistent with its industrial land use designation and its zoning will provide new industrial sector jobs by attracting new business into the City, as well as the jobs and businesses that will be required to provide supporting services to the Project.

Surrounding properties are primarily developed with one- and two-story, single- and multi-family dwellings, one-story commercial buildings, institutional uses such as Gardena Professional Medical Plaza, First Southern Baptist Church, and Amestoy Elementary School, a railroad track, and the Rosecrans Recreation Center. The Project is designed to protect nearby sensitive uses from negative impacts associated with the proposed development through various site design elements, including landscape buffers, screening such as 18-foot CMU walls immediately north, east and west of the loading area which would be landscaped and/or include a mural, and vegetation, electric offroad operational equipment, and a Truck Trip Cap of 768 trips per day. Further, infrastructure improvements, such as a new bus turnout and shelter at the existing bus stop on Vermont Avenue, the addition of a pedestrian rail crossing to provide a connection to the sidewalk north of the property on Vermont Avenue, and upgrades to all unimproved sidewalk areas adjacent to the site through the installation of new sidewalks, trees, and landscaping, will improve pedestrian walkability and public transportation access for the local community. Additionally, the Project would provide passenger vehicle parking spaces, including 12 electric charging stalls for electric passenger vehicles, and 33 EVSE stalls for passenger vehicles which serves to reduce negative air quality impacts associated with operation of the Project.

Chapter 7: Economic Development

Goal 7A: *A vibrant economically revitalized City.*

Goal 7B: *A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.*

Objective 7.2: *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*

Policy 7.2.8: *Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.*

Policy 7.2.10: *Ensure that the City's industrial sites are regionally competitive to maintain and enhance a core manufacturing base.*

Goal 7C: *A City with thriving and expanding businesses.*

Objective 7.3: *Maintain and enhance the existing businesses in the City.*

Policy 7.3.5: *Improve the movement of goods and workers to industrial areas.*

Goal 7D*: A City able to attract and maintain new land uses and businesses.*

Objective 7.5: *Capture a significant share of regional growth in the "targeted" or emerging industries in the City of Los Angeles.*

Policy 7.5.3: *Strive to provide an industrial business climate that meets the needs of the targeted industries.*

Goal 7H: *A distribution of economic opportunity throughout the City.*

Objective 7.10: *Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.*

Policy 7.10.1: *Focus available implementation resources in centers, districts, and mixed-use boulevards or "communities of need."*

Policy 7.10.2: *Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.*

The Project Site is located in the urbanized Harbor Gateway Community Plan area. Surrounding properties include one- and two-story, single- and multi-family dwellings, a Mobil gas station, a Hustler Casino, shopping complex, trash/recycling center, recreation center, and commercial businesses, and borders the City of Gardena to the west. The surrounding properties within the boundaries of the City of Los Angeles are generally developed with single family homes and the Rosecrans Recreation Center located approximately 80 feet north, a waste/recycling facility, a shopping complex and an open-air trash transfer/recycling center uses to the east, and one- and two-story, single- and multi-family dwellings, approximately 100 feet from the Project Site across Redondo Beach Boulevard to the south, while the properties located within the boundaries of the City of Gardena to the west are generally developed with industrial and commercial uses. The Project would provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway Community Plan area by retaining industrial land uses at this site such that the Community

Plan area can continue to support and allow emerging industrial sectors to remain competitive.

Moreover, as a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as the I-110 freeway, and is in proximity to the Ports of Long Beach and Los Angeles, the Project would not only support business in the City and the movements of goods, but it would also minimize truck traffic on local streets. Further, locating this new industrial use as close to major transportation infrastructure as community plans and zoning allow will reduce truck trips and improve goods movement generally, thereby reducing air quality impacts related to vehicle miles traveled in the region, sustaining economic growth, and supporting the needs of local residents.

Further, the Project would provide infrastructure improvements, which include a new bus turnout and shelter at the existing bus stop on Vermont Avenue, the addition of a pedestrian rail crossing to provide a connection to the sidewalk north of the property on Vermont Avenue, and upgrades to all unimproved sidewalk areas adjacent to the site through the installation of new sidewalks, trees, and landscaping, thereby improving the accessibly of public transit and pedestrian walkability for the surrounding community. As a result, this Project would improve public infrastructure in a community that has historically lacked walkability and access to public transportation.

Noise Element

Objective 2: *Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.*

Policy 2.2: *Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.*

Objective 3: *Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.*

Policy 3.1: *Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.*

The property is currently zoned M2-1VL-O, which is substantially consistent with the proposed development. Project Design Features N-PDF-1, and N-PDF-3 through N-PDF-5 would be implemented to reduced adverse impacts related to operational noise for nearby sensitive receptors. Also, as discussed above, the Project Site is approximately 15 acres, and the proposed 340,298 square-foot warehouse/ manufacturing/ high-cube warehouse/ distribution center, would be concentrated in the center of the Project Site, placed away from the residential uses to the south. Further, loading docks would be located on the northern elevation and would be no closer than 300 feet from residential and open space uses to the north; and an 18-foot CMU sound wall would be installed along the northern property line and would be landscaped and/or decorated with a mural. Landscaping and additional trees along the new sidewalks, would serve to maintain privacy and further reduce noise that is generated from operations and prevent noise pollution from impacting adjacent properties, thereby reducing impacts to the current noise quality of the community. Additional 18-foot-high concrete walls are also proposed immediately east and west of the loading area and would also be landscaped and/or decorated with a mural. As conditioned, construction equipment would be required to be tuned and maintained in accordance with manufacturer's specifications. All construction equipment for the Project would also be required to be

equipped with a backup alarm to utilize a broadband-style backup alarm, thus reducing noise disturbance and noise pollution in the surrounding community, specifically construction noise on nearby sensitive receptors.

Air Quality Element

Goal 1: *Good air quality and mobility in an environment of continued population growth and healthy economic structure.*

> ***Objective 1.1****: Reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.*

Goal 2: *Less reliance on single-occupant vehicles with fewer commute and non-work trips.*

> ***Objective 2.1:*** *Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.*
>
> > ***Policy 2.1.1:*** *Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking / bicycling related facilities in order to reduce Vehicle Trips and / or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.*

Goal 4: *Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.*

> ***Objective 4.2:*** *Reduce vehicle trips and vehicle miles traveled associated with land use patterns.*
>
> > ***Policy 4.2.3:*** *Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.*
> >
> > ***Policy 4.2.5:*** *Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.*

Goal 5: *Energy Efficiency through land use and transportation planning, the use of renewable resources, and the implementation of conservation measures such as site orientation and tree planting.*

> ***Objective 5.3:*** *Reduce the use of polluting fuels in stationary sources.*
>
> > ***Policy 5.3.1:*** *Support the development and use of equipment powered by electric or low-emitting fuels.*

The Project Site is located directly adjacent to the I-110 freeway, and one of the few large vacant parcels within close proximity to a freeway and the Ports of Los Angeles and Long Beach. Locating this new industrial use as close to these industrial centers as community plans and zoning allow will reduce truck trips and improve goods movement generally, thereby reducing air quality impacts related to vehicle miles traveled in the region, sustaining economic growth, and supporting the needs of local residents.

Moreso, the Project would support the use of clean energy with the installation of 12 electric charging stalls for electric passenger vehicles, and 33 EVSE stalls for passenger vehicles.

The Project is also providing 16 short-term bicycle spaces and 16 long-term bicycle spaces and required bicycle facilities, to encourage alternative modes of transportation. Additionally, T-PDF-3 requires a TDM Program, which includes measures to reduce vehicular traffic generated by people traveling to and from the Project Site, including transit information and promotions, a carpooling program for employees, flexible/alternative work schedules, and parking cash-out programs.

The Project has also been designed to provide prominent pedestrian entries for pedestrians along Redondo Beach Boulevard at the southwest and southeast corners of the proposed building, as well as pedestrian pathways throughout the Project Site that link the proposed building and adjacent sidewalks. Additionally, the Project would provide public infrastructure improvements by installing a new public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection. The Project would enhance the built environment by providing native landscaping trees on-site and within the adjacent right-of-way, which would provide pedestrians shade and protection from the natural elements while creating curb appeal that would enhance the pedestrian experience as compared to the existing conditions. Therefore, the Project would enhance the pedestrian experience, as compared to the existing conditions, and promote walkability in the area.

Mobility Plan 2035

The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities. The Mobility Element sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The Project would be in conformance with following goals of the Mobility Element as described below.

Goal 2: *World Class Infrastructure.*

> ***Policy 2.3:*** *Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*
>
> ***Policy 2.10:*** *Facilitate the provision of adequate on and off-street loading areas.*

Goal 3: *Access for All Angelenos.*

> ***Policy 3.1:*** *Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.*
>
> ***Policy 3.3:*** *Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

Goal 4: *Collaboration, Communication & Informed Choices.*

> ***Policy 4.12:*** *Increase public awareness about the importance and economic value of goods movement in the Los Angeles region.*

Goal 5: *Clean Environments and Healthy Communities.*

> ***Policy 5.4:*** *Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.*

The Project Site is located at the northeast corner of the intersection of Vermont Avenue and Redondo Beach Boulevard. The Project would consolidate the number of driveways providing access to the Project Site from the existing eight driveways to four driveways, which includes two driveways along Orchard Street, one driveway on Vermont Avenue, and one driveway on Redondo Beach Boulevard; and relocate them away from intersections bordering the Project Site. Passenger vehicle access will be allowed from all Project Site driveways. Truck access will occur at the northerly Project driveways at Orchard Avenue and Vermont Avenue with adequate space for four trucks to queue on-site at the Orchard Avenue driveway and three trucks to queue on-site at the Vermont Avenue driveway. As conditioned, a TDM Program, which includes measures which would reduce vehicular traffic generated by people traveling to and from the site, including transit information and promotions, a carpooling program for employees, flexible/alternative work schedules, and parking cash-out programs; restriping of Orchard Avenue; and a payment of $100,000 to the LADOT ATSAC fund would be required, further improving circulation in the area.

The Project has been designed to provide an inviting pedestrian experience, with prominent pedestrian entries along Redondo Beach Boulevard at the southwest and southeast corners of the proposed building, as well as pedestrian pathways throughout the Project Site that link the proposed building and adjacent sidewalks. The Project also includes landscaping and trees separating parking and sidewalks, providing an inviting pedestrian experience along each street frontage. Additionally, sidewalks would be constructed along Vermont Avenue (15-foot width), Redondo Beach Boulevard (15-foot width), and Orchard Avenue (12-foot width) as part of the Project. All current site access points will be closed, with sidewalk, curb, and gutter reconstructed to the City of Los Angeles' current standards. The Project would also improve the pedestrian circulation in the area by providing a rail crossing north of the Project Site along Vermont Avenue, connecting sidewalks on either side of the divided Vermont Avenue. The Project would support multiple modes of transportation and increases connectivity for all Angelenos by installing a new bus turn-out and shelter, improving walking conditions for pedestrians with sidewalk widening and the addition of street trees, and providing short- and long-term bicycle parking.

The Project has been designed to further support the Mobility Plan 2035 goals by intentionally diverting truck traffic from higher pedestrian activity areas, providing adequate on-site parking for employees and visitors, adequate truck parking, loading, and circulation for trucks associated with the use, and pre-wiring truck parking for EVSE. Specifically, all truck loading and unloading for the high truck loading docks and truck trailer parking spaces would be located behind the proposed building (along the north side of the Project Site), adjacent to the railroad right-of-way to the north to ensure minimal interaction between trucks and pedestrians, and reduce traffic disruptions associated with the operation of the Project. As conditioned, the Project would provide a maximum of 71 parking stalls for truck trailers, six of which would be capable of supporting future EVSE. Additionally, the Project would provide passenger vehicle parking spaces, including 12 electric charging stalls for electric passenger vehicles, and 33 EVSE stalls for passenger vehicles.

Further, the Project EIR includes AQ-MM-6, which requires transport trucks meet the California Air Resources Board's (CARB) 2010 engine emissions standards and AQ-MM-9, which establishes a truck trip cap limiting the number of trucks entering and leaving the Project Site per day, with reporting requirements, compliance provisions, and requiring the applicant to provide LADOT access for auditing or monitoring. Together with the access controls, on-site queueing, loading, and parking the Project broadly furthers Mobility Plan 2035 goals, providing a safe and efficient industrial use while maintaining economic viability, supporting goods movement, and further the adoption of cleaner freight moving strategies.

Lastly, the Project would support the City's goal of increasing public awareness regarding the importance and economic value of goods movement in the region by developing the Project in close proximity to the Ports of Los Angeles and Long Beach and the regional highway system. The Project's proximity to the I-110 freeway would enable the facility to handle a greater number of truck deliveries without adversely affecting surrounding residential and commercial communities because of the Project Site's direct access to the freeway via a major throughway, which reduces the need to use surface streets for goods movement. Moreso, the Project Site's close proximity to the Ports of Los Angeles and Long Beach would serve to limit truck VMT by placing the proposed development close to supporting services, thereby further reducing adverse impacts to the local community. As a result, the Project will contribute to the City's standing as a leader in internation trade and goods movement, while demonstrating to the public how such a use can be integrated into the urban landscape with minimal disruption to surrounding neighborhoods and communities.

Health and Wellness Element

Adopted in March 2015, the Plan for a Healthy Los Angeles, or the **Health and Wellness Element** of the General Plan, calls for the promotion of a healthy built environment in a manner that enhances opportunities for improved health and well-being, and which promotes healthy living and working conditions. The Project is consistent with the following:

Chapter 2: A City Built for Health.

> ***Policy 2.2:*** *Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.*
>
> ***Policy 2.11:*** *Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.*

Chapter 5: An Environment Where Life Thrives

> ***Policy 5.1:*** *Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.*

The Project would maintain a maximum of 71 parking stalls for truck trailers, six of which would be capable of supporting future EVSE. Additionally, the Project would provide passenger vehicle parking spaces, including 12 electric charging stalls for electric passenger vehicles, and 33 EVSE stalls for passenger vehicles. As conditioned, all forklifts used on-site would be electric-powered and the installation of one charging station for electric-powered offroad equipment would be installed prior to the issuance of a building permit, all of which serves to reduce health impacts relating to air quality associated with operation of the Project. Furthermore, in compliance with LAMC, the Project will include 32 bicycle parking spaces to promote the use of bikes to commute to work in lieu of cars, thereby promoting alternative, cleaner forms of transportation to and from the Project Site.

Additionally, the Project would provide infrastructure improvements to include a new bus turnout and shelter at the existing bus stop on Vermont Avenue, the addition of a pedestrian

rail crossing to provide a connection to the sidewalk north of the property on Vermont Avenue, and upgrades to all unimproved sidewalk areas adjacent to the site through the installation of new sidewalks, trees, and landscaping, thereby creating an environment conducive to healthy living through improved pedestrian walkability and public transportation access for the local community. As conditioned, a TDM Program, which includes measures which would reduce vehicular traffic generated by people traveling to and from the site, including transit information and promotions, a carpooling program for employees, flexible/alternative work schedules, and parking cash-out programs.

The Project also proposes to provide 73,583 square feet of native landscaping, including 166 trees, on a lot that was previously paved with minimal street trees. The incorporation of trees and landscaping would slightly counteract emissions from stationary and mobile sources that cause air quality concerns, and the addition of street trees would improve the pedestrian experience through their shading and scenic qualities.

These project features in addition to the public infrastructure improvements described above support the local community's need for safe, attractive, and comfortable facilities, while also enabling more active modes of transportation, such as walking, biking, and public transportation. Therefore, the Project would further the above Framework Element policies and goals by reducing air pollution from mobile sources utilized in the operation of this facility that would impact the respiratory health of local residents.

Harbor Gateway Community Plan

The Harbor Gateway Community Plan, adopted December 6, 1995, seeks to balance protection of existing residential areas, enhancement of commercial corridors, and environmentally sensitive new industrial uses. The Community Plan designates the subject property for Light Manufacturing land uses with corresponding zones of M2, MR2 and P, with adjacent properties to the east on both side of the I-110 freeway sharing the land use designation and corresponding zones. The Project would be in conformance with following goals of the Community Plan as described below:

1. *Industrial lands are allocated on a citywide basis without regard to the boundaries of individual communities or districts in accordance with the general principle that jobs should be available within a reasonable commuting distance from employees' homes.*

2. *Off-street parking should be provided consistent with the Municipal Code as the minimum. Off-street parking areas shall be located at the peripheries of industrial sites to serve as buffers and shall be separated from adjacent private and public uses by at least a wall and/or landscaped setback sufficient to screen the industrial operation from view.*

The Project Site is a large industrially zoned collection of parcels, adjacent to other industrially zoned parcels and uses, intended to be sensitively developed with industrial uses. The Project Site was previously used for industrial purposes; however, the site is currently vacant, enclosed by a chain link fence, and contains asphalt, concrete, and various remanent concrete slab building foundations from previous industrial uses, including the remains of two former manufacturing facilities, Virco on the western half and Electricord on the eastern half of the Project Site, and a former Arco gas station, located at the southwestern corner of the Project Site, where a total of seven USTs and associated dispensers and piping were removed in 1989.

The Project has been designed, and conditioned, to sensitively incorporate the new use and accompanying traffic into the existing circulation system, with conditions and operational

elements that reduce impacts from the new use. The three manufacturing facilities that were previously improved on the site have left contaminated soil on the premises, which the Applicant will assume the responsibility of remediating pursuant to RWQCB requirements. Additionally, the Project EIR requires a number of mitigation measures which address the contaminated soil that would be disturbed as a result of construction. The Project will not remediate all soil contamination across the Project Site but will remediate disturbed soil and replace the vacant site with a new development that will manage stormwater runoff from the site pursuant to local, State and federal regulations. The Applicant will assume these responsibilities with no cost to the City.

Additionally, construction of the warehouse would bring industrial jobs back to the community and make up for job losses that occurred as result of the closure of the former facilities. With the reintroduction of industrial land uses at this site, the implementation of the TDM Program, restriping of Orchard Avenue, payment of $100,000 to the LADOT ATSAC fund, and proposed public right-of-way improvements, the Project would ensure that the City is able to attract and maintain its industrial base by redeveloping the Project Site in a manner that improves the built environment, supports industrial activities, and creates new industrial related jobs. Moreover, as a warehouse/manufacturing/high-cube warehouse/distribution center that is 650 and 1,150 feet west of the north- and southbound on- and off-ramps for the I-110 freeway, and connections to the San Diego Freeway (I-405), the Long Beach Freeway (I-710), the South Bay, and ports, the Project would not only support business in the City and the movements of goods, but it would minimize truck traffic on local streets, prevent routing through residential areas, and provide efficient access for employees that live outside the immediate area, thereby reducing impacts to vehicle miles traveled in the region and supporting the needs of local residents.

Lastly, off-street parking is provided consistent with LAMC requirement and is located at the perimeter of the site. All loading and unloading would be located within a fully screened yard at the rear (north side) of the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks. Additionally, landscaping to the northern end of both Vermont Avenue and Orchard Avenue would provide additional screening. Landscaping along Vermont would extend; and for Orchard Avenue, would occur adjacent to the proposed water basin on the northeast corner of the Project Site. The loading docks would be oriented on the north side of the building where the nearest sensitive receptors to the north would be shielded by a proposed 18-foot-high concrete sound wall and adjacent railroad right of way. Additional 18-foot-high concrete walls are proposed immediately east and west of the loading area. As conditioned, all of the walls would be landscaped and/or decorated with a mural.

Therefore, the Project would support and would be generally consistent with the Framework Element, Health and Wellness Element, Mobility Element, and Land Use Element (Harbor Gateway Community Plan), therefore, it is in substantial conformance with the goals, objectives and policies of the General Plan, and does not conflict with any applicable regulations or standards.

Additional Findings for Major Development Projects - LAMC 12.24 U.14

4. The recommended action provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.

The Project Site is generally surrounded by a mix of medium- to low-medium density residential, commercial, light industrial and institutional uses, and would be developed in a way that respects and responds to the surrounding context. The Project's proximity to the I-

110 freeway would enable the facility to handle a greater number of truck deliveries without adversely affecting surrounding residential and commercial communities is it would have direct access to the freeway via a major throughway, which reduces the need to use surface streets for goods movement. Moreso, the Project Site's proximity to the Ports of Los Angeles and Long Beach would serve to limit truck VMT by placing the proposed warehouse/manufacturing/high-cube warehouse/distribution center close to supporting services, thereby further reducing adverse impacts to the local community.

Additionally, the Project would be designed with a form and layout that respects and responds to its surrounding context by incorporating articulation, shading, such as overhangs, and a variety of materials to help break up the building's massing into a more human scale that would be compatible with adjacent properties while retaining the feasibility of the designated light industrial land use. Further, the proposed building would be set back from the public right-of-way by a surface parking lot, which would then be buffered from the sidewalk by substantial landscaping, including 166 trees, to insulate nearby sensitive receptors from the increased height and massing of the building. The Project also recognizes its surrounding context through the incorporation of pedestrian linkages from various entry points of the building to the adjacent sidewalks, which would be enhanced with landscaping, therefore promoting a cohesive transition between the proposed development and the surrounding urban fabric.

Therefore, the Project's location, size, height, operations and other significant features will be compatible with the scale and character of the adjacent properties and surrounding neighborhood.

5. The Major Development Project complies with the height and area regulations of the zone in which it is located.

Existing physical Development in the surrounding area ranges from one to four stories, with taller buildings immediately to the west in the City of Gardena. Residential structures to the south range from one to three stories or approximately 40 feet, with allowed projections exceeding the 45-foot limit pursuant to LAMC Section 12.21.1 B.3, functionally appearing as larger buildings due to parapets and other permitted appurtenances. Further to the south are single family homes, located. To the east are industrial buildings, ranging in height from single story buildings to 32 feet, with similar rooftop projections. Buildings to the west are located in the City of Gardena, and are approximately 45 feet. Buildings to the north are generally single-story, single-family homes.

The Project Site is zoned M2-1VL-O for which, pursuant to LAMC 12.21.1 A.1, the maximum height permitted for structures in the M2-1VL Zone is 45 feet; and a maximum Floor Area Ratio (FAR) of 1.5:1. The Project proposes a 340,298 square-foot building on an approximately 15-acre site, resulting in an 0.52:1 FAR. However, the Applicant is requesting relief from LAMC Section 12.21.1 A.1 to allow a 53-foot building height in lieu of the otherwise permitted 45 feet. The intent of height regulations are, in part, to reduce a building's impact on surrounding properties and to maintain a scale which is consistent and compatible with abutting properties.

The proposed building would be developed with a warehouse/manufacturing/high-cube/warehouse/distribution center use which require substantially tall ceilings in order to accommodate industrial-sized machinery and equipment as well as storage of industrial and shipping goods. While the proposed Project seeks an additional eight feet in height, the building would still only be one story with a 25,000 square-foot mezzanine occupying a small portion of the interior space. In addition, the property slopes downward from the southwest corner to the northeastern corner of the site of approximately five to six feet. The M2 Zone

does not require setbacks for non-residential uses. However, the proposed building would observe more than 50-foot setbacks along all street frontages, as well as locating the building a minimum 68 feet from the Rosecrans Recreation Center and residential uses to north. The proposed building would also be set back from the public right-of-way by a surface parking lot, which would then be buffered from the sidewalk by substantial landscaping, further limiting any adverse impacts associated with the added building height.

Therefore, in conjunction with the approval of the Adjustment request for increase height, the Project would comply with intent of the height and area regulations of the M2-1VL-O Zone.

6. The Major Development Project is consistent with the City Planning Commission's design guidelines for Major Development Projects, if any.

The City Planning Commission has not adopted design guidelines for Major Development Projects; however, the Project is consistent with the following guidelines of the Citywide Design Guidelines:

Pedestrian-First Design

The Project Site is bordered by a railroad line to the north, Orchard Avenue and industrial uses to the east, Redondo Beach Boulevard to the south, and Vermont Avenue and a railroad line to the west. The Project Site is currently improved with a sidewalk along Redondo Beach Boulevard to the south, with a sidewalk serving only the bus shelter along Vermont Avenue. The Project is required to improve each street frontage with a new curb, gutter, and ADA complaint sidewalk. Further, the Project has proposed a new bus shelter along Vermont Avenue as part of the new sidewalk improvements.

The site design has been arranged to incorporate pedestrian access and consider the surrounding public sidewalks. Additionally, outdoor seating areas, including tables for eating, along and around the pedestrian pathways throughout the site and within the landscaped area at the northwest portion of the site to further promote pedestrian activity and interaction with the Site and improve the user experience. The Project has been designed to provide articulation and a variety of shading, such as overhangs, and changes in materials that help break up the mass of the building, add visual interest, and bring the building to a more human scale; and prominent building entries for pedestrians, positioned along Redondo Beach Boulevard at the southwest and southeast corners of the proposed building, as well as pedestrian pathways throughout the Project Site that link the proposed building and adjacent sidewalks. The corner placement of these prominent pedestrian entries, as well as the increased use of articulation, massing and overhangs surrounding the entrances serve to accentuate these portions of the building to nearby pedestrians as a focal point of the design and to improve pedestrian circulation and legibility of the Project Site. Lighting would be designed and placed so as not to provide light spillage on adjacent properties or public rights-of-way in the form of wall-mounted security lights and rooftop skylights for natural daylighting of the interior space. In addition, "cut off" or shielded fixtures would be used to reduce nighttime glare. The Project includes pedestrian linkages from various entry points of the building to the adjacent sidewalks, which would be enhanced with landscaping and set back from the public right-of-way by a surface parking lot, which is then buffered from the sidewalk by additional native landscaping, including approximately 166 trees. The Project would also provide a new the pedestrian rail crossing at the northwest corner of the Project Site, creating a defined, safe connection to the sidewalk along Vermont Avenue, where no connection or sidewalk currently exists. These project features and improvements would create a safe and engaging pedestrian environment and would enrich the quality of the public realm.

Additionally, the Project would consolidate the number of driveways providing access to the Project Site from eight driveways to four driveways, including two driveways along Orchard Street, one driveway on Vermont Avenue, and one driveway on Redondo Beach Boulevard. Driveways are located away from intersections bordering the Project Site, with clear sight lines to avoid pedestrian-vehicle conflicts, and vehicle-vehicle conflicts. The Project design would also be designed to direct primary truck traffic down Orchard Avenue, which is a dead-end street and includes little pedestrian traffic, limiting truck access to Vermont Avenue, north of the bus shelter and intersection, with only passenger vehicles permitted to use the driveway along Redondo Beach Boulevard. All truck loading and unloading would be located behind the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks. This design ensures minimal interaction between vehicles and pedestrians, therefore reducing traffic disruptions associated with operation of the Project and increasing the safety and comfort of pedestrians.

360 Degree Design

The proposed building would be developed in a way that respects and responds to the surrounding context, and would be compatible with the current arrangement, uses, and urban context of the surrounding industrial and commercial uses located to the west, as well as the residential uses to the north and south, and the open space use to the north. The Project has a contemporary design with plane breaks, varied materials, and a prominent entry way breaking down massing along Redondo Beach Boulevard and Vermont Avenue, matching the general form and massing of industrial and commercial buildings to the east and west, while incorporating landscaping, plane breaks, and a color palette that complements the varied architectural styles of the residential uses to the north and south. Any glass used in building facades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare by minimizing the use of glass with mirror coating. Further, the proposed building would be located generally at the center of the lot, and setback from the public right-of-way by a surface parking lot, which would then be buffered from the sidewalk by substantial landscaping, including approximately 165 trees, to insulate nearby sensitive receptors from the increased height and massing of the building.

The Project's longest public-facing street frontage, the south façade, is along Redondo Beach Boulevard. All building facades feature a contemporary design with plane breaks, a variety of materials and colors, shading, such as overhangs, and horizontal and vertical articulation, including a series of wall insets, to create visual interest and break up the proposed building's massing into a more human scale that would be compatible with adjacent properties, while retaining the feasibility of the designated light industrial land use. The exterior of the proposed building would consist of concrete with a light gray finish and green accents, glazing, and tilt-up panels. Prominent building entries are located at the corners of the proposed building, as well as the increased use of articulation, massing and overhangs surrounding the entrances serve to accentuate these portions of the building to nearby pedestrians as a focal point of the design and to improve pedestrian wayfinding.

Climate-Adaptive Design

The Project would incorporate environmentally sustainable building features and comply with construction protocols required by the Los Angeles Green Building Code and CALGreen, which would reduce energy and water usage. Specifically, the Project would provide conduit infrastructure for future EV charging stations for 20 percent of automobile parking spaces and 5 percent of tractor trailers parking spaces would be equipped with EVSE charging stations in consideration of no emission goals of the Los Angele Harbor and State and Local Air Quality agencies. The Project will also install a rooftop solar photovoltaic (PV) system to offset energy demands of the office portion of the use, to generate a

minimum of 460,000 kilowatt-hours per year (kWh/yr) of renewable electricity, sized to offset the expected electrical consumption.

The Project incorporates energy-saving and sustainable design features and operational programs, including those required by the California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11). The Project would also incorporate design features and attributes promoting energy efficiency and sustainability. Specifically, the design focuses glazing primarily at potential office locations in the facility, thereby reducing energy loss and heat gain in the building overall. Furthermore, the proposed building would be designed and built to meet the standard for Leadership in Energy and Environmental Design (LEED) Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program. Additionally, the Project would incorporate design features and attributes promoting energy efficiency and sustainability such as glazing primarily at potential office locations in the facility, thereby reducing energy loss and heat gain in the building overall.

Additionally, the Project Site currently contains asphalt and concrete paving in fair to poor condition, and various remanent concrete slab building foundations from previous industrial uses, resulting in limited opportunities for the capture of stormwater and promotion of habitat on site. There are 35 on-site and adjacent right-of-way trees that allow for some stormwater capture and habitat promotion; however, the Project would increase the site's potential for stormwater capture and habitat promotion by providing approximately 73,583 square feet of native landscaping, including 166 trees, which would promote habitat and increase greenery in the area. The Project also proposes capture and re-use best management practices sized to treat the stormwater consistent with City Low Impact Development Standards and is designed so that the northern half of the Project's proposed building, the northern portion of the truck yard, the drive aisle in the northwestern portion of the Project Site, and the western portion of the parking lot would drain to catch basins in the drive aisle and truck yard, and the southern half of the proposed building and the southern and eastern portions of the parking lots would drain to catch basins in the parking lots.

Therefore, the Project would be consistent with the Citywide Design Guidelines.

Adjustment Findings

Following are the required findings for an Adjustment to allow a 20 percent increase in the maximum building height otherwise permitted for the M2-1VL-O Zone, as required by LAMC Section 12.28.

7. While site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible, the Project nonetheless conforms with the intent of those regulations.

The Project Site is located in an urbanized area, known as the Harbor Gateway North neighborhood, and is generally surrounded by a mix of medium- to low-medium density residential, commercial, light industrial and institutional uses. The property to the north, across a railroad right-of-way for a freight line, is the Rosecrans Recreation Center, which is designated for Open Space uses and zoned OS-1XL. Properties to the east, across Orchard Avenue, consist of a shopping complex and an open-air trash transfer/recycling center, immediately to the northeast, both are designated for Light Industrial uses and zoned M2-1VL-O. Properties to the south, across Redondo Beach Boulevard, include one- and two-story, single- and multi-family dwellings that are designated for Low and Medium Residential uses and zoned R1-1 and R3-1, respectively. The property at the southeast

corner of Vermont Avenue and West Redondo Beach Boulevard is developed with a gas station. The City of Gardena immediately abuts the site to the west. Properties within the City of Gardena limits, across Vermont Avenue and the railroad right-of-way, are designated for General Commercial land uses and are zone C3. The property at the southwest corner of Vermont Avenue is the Hustler Casino. The property directly to the northwest of the site is the Kei-Ai Southbay Healthcare Center (rehabilitation facility). One block further to the west, west of Berendo Avenue, is the Memorial Hospital of Gardena. First Southern Baptist Church and Amestoy Elementary School are located in the vicinity across Vermont Avenue to the northwest.

The Project Site is zoned M2-1VL-O for which, pursuant to LAMC 12.21.1 A.1, the maximum height permitted for structures in the M2-1VL Zone is 45 feet. The Applicant is requesting relief from LAMC Section 12.21.1 A.1 to allow a 53-foot building height in lieu of the otherwise permitted 45 feet. The intent of height regulations are, in part, to reduce a building's impact on surrounding properties and to maintain a scale which is consistent and compatible with abutting properties. The Project Site is bounded to the north by a Union Pacific railroad line which ascends diagonally west to east, Orchard Avenue to the east, Redondo Beach Boulevard to the south, and an eastern span of Vermont Avenue to the west, with a Union Pacific right of way splitting the north and south bound spans of Vermont avenue until the railway turns east to then form the northern boundary of the Project Site.

Physical Development in the surrounding area ranges from one to four stories, with taller buildings immediately to the west in the City of Gardena. The residential structures to the south range from one to three stories or approximately 40 feet, with allowed projections exceeding the 45-foot limit pursuant to LAMC Section 12.21.1 B.3, functionally appearing as larger buildings due to parapets and other permitted appurtenances. Further to the south are single family homes, located. To the east are industrial buildings, ranging in height from single story buildings to 32 feet, with similar rooftop projections. Buildings to the west are located in the City of Gardena, and are approximately 45 feet. Buildings to the north are generally single-story, single-family homes.

The proposed building would be developed with a warehouse/manufacturing/high-cube/ warehouse/distribution center use which require substantially tall ceilings in order to accommodate industrial-sized machinery and equipment as well as storage of industrial and shipping goods. While the proposed Project seeks an additional eight feet in height, the building would still only be one story with a 25,000 square-foot mezzanine occupying a small portion of the interior space. In addition, the property slopes downward from the southwest corner to the northeastern corner of the site of approximately five to six feet. The M2 Zone does not require setbacks for non-residential uses. However, the proposed building would observe a five-foot setback along both Redondo Beach Boulevard and Vermont Avenue, as well as locating the building a minimum 68 feet from the Rosecrans Recreation Center and residential uses to north.

The Project Site currently contains contaminated soils and foundations of previous industrial buildings that may contain hazardous materials. The Project requires higher floor to ceiling height than a typical commercial or residential building. As subterranean excavation would disturb the existing hazardous materials, building taller is the most practical option.

As discussed above, height regulations are primarily intended to reduce impacts to, and maintain a consistent scale with, surrounding properties. The surrounding area consists of buildings of various heights and uses, with some rooftop projections and architectural elements appearing larger than the built to height. The proposed building height of 53 feet would be consistent with the varied scale and arrangement of buildings in the area. Additionally, the subject property does not directly abut any residential or sensitive uses

which could be impacted by the height of the structure. The site plan has been arranged with this in mind, as the building itself would be located central to the property, with ample distance to each property line.

As such, in light of the fact that the site conditions effectively preclude subterranean excavation, the surrounding area consists of a range of building heights that are generally consistent, and no abutting properties would be adversely impacted, the proposed height would conform to the intent of the height restrictions.

8. **In light of the Project as a whole, including any mitigation measures imposed, the Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

Pursuant to LAMC Section 12.36 D, when acting on multiple applications for a Project, findings may be made by reference to findings made for another application involving the same Project. This finding is substantially similar to Finding No. 2 (Conditional Use Permit Findings) and, pursuant to LAMC Section 12.24 E, is hereby incorporated by reference.

9. **The Project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and any applicable specific plan.**

Pursuant to LAMC Section 12.36 D, when acting on multiple applications for a Project, findings may be made by reference to findings made for another application involving the same Project. This finding is substantially similar to Finding No. 3 (Conditional Use Permit Findings), and pursuant to LAMC Section 12.24 E, is hereby incorporated by reference.

Site Plan Review Findings

10. **The project substantially conforms with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.**

Pursuant to LAMC. Section 12.36 D, when acting on multiple applications for a Project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. This finding is substantially similar to the above Finding No. 3 in the Conditional Use Permit Findings pursuant to LAMC Section 12.24 E and is hereby incorporated by reference.

11. **That 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 Project Site is located in the urbanized Harbor Gateway Community Plan area. Surrounding properties include one- and two-story, single- and multi-family dwellings, a Mobil gas station, a Hustler Casino, shopping complex, trash/recycling center, recreation center, and commercial businesses, and borders the City of Gardena to the west. The surrounding properties within the boundaries of the City of Los Angeles are generally developed with single family homes and the Rosecrans Recreation Center located approximately 80 feet north, a waste/recycling facility, a shopping complex and an open-air trash transfer/recycling center uses to the east, and one- and two-story, single- and multi-family dwellings, approximately 100 feet from the Project Site across Redondo Beach

Boulevard to the south, while the properties located within the boundaries of the City of Gardena to the west are generally developed with industrial and commercial uses.

As discussed above, a mix of medium to low-medium density residential, commercial, light industrial and institutional uses make up the general character of the surrounding neighborhood, with building heights ranging from one to four stories, and taller buildings immediately to the west in the City of Gardena.

The Project would consist of a 340,298 square-foot warehouse/manufacturing/high-cube/warehouse/distribution center. The Project's building arrangement, off-street parking facilities, lighting, landscaping, and trash collection is compatible with the existing and future development on adjacent properties and neighboring properties, as described below.

Height, Bulk, and Mass

Residential uses to the south are in the R3-1 Zone, with some commercial uses along Vermont Avenue in the [Q]C2-1 Zone, all subject to a 45-foot height limit. The residential structures range from single story buildings to three stories or approximately 40 feet, with allowed projections exceeding the 45-foot limit pursuant to LAMC Section 12.21.1 B.3, functionally appearing as larger buildings due to parapets and other permitted projections. Further to the south are single family homes, located in the R1-1 Zone behind these structures. To the east are industrial buildings, zoned M2-1VL-O with a 45-foot limit, ranging in height from single story buildings to approximately 32 feet, with similar rooftop projections. Buildings to the west are in the City of Gardena, but nonetheless reach approximately 45 feet. Buildings to the north are generally single-story single-family homes. Other surrounding properties are developed with a railroad track, Rosecrans Recreation Center and Amestoy Elementary School. The Project is within an area that has been zoned for light manufacturing uses. No residential, commercial, open space, or other zones within the Harbor Gateway Community or the City of Gardena would be altered due to the location of the Project.

The proposed building would be developed with a warehouse/manufacturing/high-cube/ warehouse/distribution center use which require substantially tall ceilings in order to accommodate industrial-sized machinery and equipment as well as storage of industrial and shipping goods.

Further, the proposed building would be developed in a way that respects and responds to the surrounding context and promotes a cohesive transition between the proposed development and the surrounding large scale, contemporary-style industrial and commercial uses located to the east and west, as well as the architecturally diverse, single-story to four-story residential uses to the north and south, and the open space use to the north. The Project has a contemporary design with plane breaks, varied materials, and a prominent entry way breaking down massing along Redondo Beach Boulevard and Vermont Avenue, matching the general form and massing of industrial and commercial buildings to the east and west, while incorporating landscaping, plane breaks, and a color palette that complements the varied architectural styles of the residential uses to the north and south. The proposed building features a variety of materials and colors, shading, such as overhangs, and horizontal and vertical articulation, including a series of wall insets, to create visual interest and break up the proposed building's massing into a more human scale that would be compatible with adjacent properties, while retaining the feasibility of the designated light industrial land use. Overall, the tallest portion of the Project will be concentrated in the center of the Project Site, away from the residential uses to the south, and set back from the public right-of-way by a surface parking lot, which would then be buffered from the

sidewalk by substantial landscaping, including 166 trees, to insulate nearby sensitive receptors from the increased height and massing of the building.

Setbacks

Setbacks are not required in the M2 Zone per the LAMC. However, the proposed building would be located at the center of the lot, with the building set back 82 feet from Redondo Beach Boulevard, 75 feet from Vermont Avenue, 60 feet from Orchard Avenue, and approximately 200 feet from the railroad right-of-way to the building centerline. Loading docks would be located on the northern side of the property and would be no closer than 300 feet from residential and open space uses to the north, with an 18-foot sound wall along the northern property line providing additional separation. Additional 18-foot-high concrete walls are also proposed immediately east and west of the loading area. The sound walls would be improved with a mural and/or landscaping to reduce the visual impacts of the sound walls on nearby sensitive uses.

Off-Street Parking and Loading Area

The Project includes a 340,298 square-foot warehouse building, which is required to provide 176 parking spaces and would provide 194 parking spaces located around the perimeter of the site to the east and to the south of the proposed building and, as mentioned above, buffered from the sidewalk by landscaping. Of the 194 spaces, 12 would be EV charging stalls with 33 EVSE stalls. In addition to the required parking for the uses on-site, the Project would provide six dock high truck loading positions, and 71 parking stalls for truck trailers, of which six tractor trailer stalls would be capable of supporting future EVSE adjacent to the railroad right-of-way to the north of the proposed building. All truck trailer parking would be within a fully-screened yard at the rear (north side) of the proposed building and buffered by an 18-foot sound wall along the northern property line to ensure they remain out of sight from public right-of-way. Additionally, the Project will provide 32 bicycle parking spaces, including 16 short- and 16 long-term spaces. The short-term bicycle parking spaces would be located adjacent to proposed building entrances at the southeast and southwest corners along Redondo Beach Boulevard, while long-term bicycle parking would be provided inside the proposed building. Lockers and showers associated with the long-term bicycle parking would also be provided inside the proposed building. All loading and unloading would be located at the rear (north side) the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks, and behind an 18-foot sound wall along the northern property line and on-site parking lot, adjacent to the railroad right-of-way, as well as landscaping and additional trees along the new sidewalks, which will serve to maintain privacy and further reduce impacts of noise on abutting residential properties and the surrounding neighborhood. All driveways and access would be designed according to LADOT standards.

Lighting

The Project does not propose substantial light sources that may negatively impact surrounding residential properties. The Project would incorporate lighting throughout the Project Site, including along the building frontage and the parking lots. Lighting would be designed and placed so as not to provide light spillage on adjacent properties or public rights-of-way in the form of wall-mounted security lights and rooftop skylights for natural daylighting of the interior space. All new outdoor lighting required for operation of the Project will be shielded and directed towards the interior of the Project Site, such that the light source does not Project directly upon any adjacent property. In addition, “cut off” or shielded fixtures would be used to reduce nighttime glare. Any interior and exterior lighting would meet the requirements of the California Energy Commission Building Energy Efficiency

Standards – Title 24, version 2016 (or the applicable version at the time of building permits), and the National Electrical Code.

Landscaping

Though the site does not presently include any landscaping, the construction of the warehouse proposes the introduction of landscaping along the northern end of Vermont Avenue and Orchard Avenue. As an industrial development, the Project is not required to provide residential open space in accordance with LAMC Section 12.21 G. However, the Project would provide 73,583 square feet of native landscaping and outdoor seating areas with tables along and around pedestrian pathways throughout the site and within the landscaped area at the northwest portion of the site.

All perimeter areas would be planted with trees and shrubs to ensure the warehouse/ manufacturing/high-cube/warehouse/distribution center uses are properly screened from the pedestrian experience. Currently, there are 21 unprotected trees located on-site and 14 unprotected trees located within the adjacent public right-of-way, all of which would be removed for the proposed development, subject to the approval of the Urban Forestry Division.

Trash

The trash enclosure area would be located northeast of the building, abutting the 18-foot CMU wall immediately east of the loading area, and would include a wall, roof, and metal gate.

As such, the Project consists of an arrangement of buildings and structures (including height, bulk and setbacks), loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that would be compatible with existing and future development on adjacent and neighboring properties.

12. That any residential Project provide recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

The Project does not include residential uses. Therefore, this finding is not applicable.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

I. Introduction.

This Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of Prologis Vermont and Redondo Project (Project), located at 15116-15216 South Vermont Avenue and 747-861 West Redondo Beach (Site or Project Site). The Project includes the construction, use, and maintenance of a one-story (with a 25,000 square-foot mezzanine), 53-foot tall, 340,298 square-foot warehouse/ manufacturing/high-cube warehouse/distribution center with a total of 194 automobile parking spaces and 32 bicycle parking spaces. The Project also includes 36 dock high truck loading positions and parking for up to 71 trailers.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an environmental impact report (EIR) (Case Number ENV-2017-1015-EIR/State Clearinghouse No. 2017121007). The EIR was

prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.
2) 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, or can or should be, adopted by that other agency.
3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

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 Environmental Impact Report for the Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR which was found to be less than significant with mitigation or significant and unavoidable, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.

- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines Sections 15093, 15043[b]; see also CEQA Section 21081[b].)

II. Environmental Review Process.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the City of Los Angeles Department of City Planning (Lead Agency) in accordance with the requirements of the CEQA (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the CEQA Guidelines.

Notice of Preparation. Pursuant to the provisions of Section 15082 of the CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 31-day period commencing on February 7, 2020, and ending on March 9, 2020. The NOP also provided notice of a Public Scoping Meeting held on February 19, 2020. The purpose of the NOP and Public Scoping Meeting 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. Written comment letters responding to the NOP and the Scoping Meeting were submitted to the City by various public agencies, interested organizations and individuals. The Initial Study is included in Appendix A of the Draft EIR, and the NOP and NOP comment letters are included in Appendix B of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2017121007), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46-day public comment period beginning on August 19, 2021, and ending on October 4, 2021. A Notice of Availability (NOA) was distributed on August 19, 2021 to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning (221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012), and the following local libraries: Los Angeles Central Library (630 West Fifth Street, Los Angeles, CA 90071), Mark Twain Branch Library (9621 South Figueroa Street, Los Angeles, CA 90003), and Watts Branch Library (10205 Compton Avenue, Los Angeles, CA 90002). The Draft EIR was also available online at the Department of City Planning's website at http://planning4la.com/development-services/eir. Moreover, the Department of City Planning offered to reasonable arrangements to mail and supply the Draft EIR materials upon request. A copy of the document was also posted online at https://planning.lacity.org. Notices were filed with the County Clerk on August 19, 2021.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on August 19, 2021, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project on March 28, 2025, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. 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 II, Responses to Comments, of the Final EIR. On March 28, 2025, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Public Hearing. A noticed public hearing for the Project was held by the Deputy Advisory Agency and Hearing Officer on behalf of the City Planning Commission on April 24, 2025.

City Planning Commission. A City Planning Commission meeting on the Project is being held on May 8, 2025.

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2019011061));
- The Municipal Code of the City of Los Angeles, including but not limited to the Zoning Ordinance and Subdivision Ordinance;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record

of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at https://planning.lacity.org/development-services/eir (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following four Library Branches:

- Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- Mark Twain Branch Library—9621 South Figueroa Street, Los Angeles, CA 90003
- Alma Reaves Woods-Watts Branch Library—10205 Compton Avenue, Los Angeles, CA 90002

IV. Project Description

The Project would consist of demolishing the numerous existing structures, which are remnants of previous buildings, including all foundations, floor slabs, utilities, and any other subsurface improvements that would not remain in place for use with the new development, and construction, use and maintenance of a one-story (with a 25,000 square-foot mezzanine), 53-foot tall, 340,298 square foot warehouse/manufacturing/high-cube warehouse/distribution center with a total of 194 automobile surface parking spaces (with 20 electric vehicle charging stations for electric passenger vehicles with an additional 38 stalls capable of supporting future electric vehicle [EV] chargers), 32 bicycle parking spaces, 36 dock high truck loading positions, and up to 71 parking stalls for truck trailers (with 6 stalls containing conduit infrastructure for future truck EV charging stations).

All loading and unloading would be located within a fully screened yard at the rear (north side) of the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks. Additionally, landscaping to the northern end of both Vermont Avenue and Orchard Avenue would provide additional screening. For Vermont Avenue, the landscaping would occur along the property line, extending approximately 235 feet east to the screened yard, and for Orchard Avenue, it would occur adjacent to the proposed water basin on the northeast corner of the Project Site. The loading docks would be oriented on the north side of the building where the nearest sensitive receptors to the north would be shielded by a proposed 18-foot-high concrete sound wall and adjacent railroad right of way. Additional 18-foot-high concrete walls are proposed immediately east and west of the loading area.

All unimproved sidewalk areas adjacent to the Project Site would be improved by meeting the City of Los Angeles Bureau of Engineering's requirements for street widening and sidewalk requirements. The Project would be required to provide dedications and improvements along all three street frontages, including reconstructing damaged sidewalks.

The Project would also provide a rooftop solar installation or other renewable energy power system to offset the expected electrical consumption of the tenant. Additionally, the Project would provide 73,583 square feet of native landscaping, including approximately 166 on-site trees, and several landscape planters throughout the Project Site. The Project would also provide off-site street trees within the newly constructed sidewalks along all street frontages abutting the Project Site as directed by the City.

V. No Impact or Less than Significant without Mitigation

Impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of

project design features and compliance with existing regulations) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Aesthetics: As discussed on page VI-8 in Section VI, Other CEQA Considerations, of the Draft EIR, on pages 27 through 28 of the in the Initial Study included in Appendix A of the Draft EIR, pages IV.A-10 through 17 in Section IV.A, Aesthetics, of the Draft EIR, and Appendix J of the Draft EIR, the Project Site does not contain nor located in proximity to a scenic vista, any scenic vista or scenic resources within a State scenic highway, and the Project would be consistent with applicable regulations governing scenic quality , Additionally, the Project would implement project design features (as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR) and comply with the Los Angeles Municipal Code (LAMC) light and glare regulations which would reduce both construction and operation light and glare and, therefore, would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. As further discussed on page IV.A-18 of the Draft EIR, the related projects are not in the immediate vicinity of the Project Site nor share a view shed and, therefore, would not contribute to a cumulative aesthetic impact. As such, Project-level and cumulative impacts would be less than significant.

Agricultural and Forestry Resources: As discussed on page VI-9 in Section VI, Other CEQA Considerations, of the Draft EIR and on pages 28 through 32 of the Initial Study included in Appendix A of the Draft EIR, the Project Site is: currently vacant; not mapped as important farmland; not zoned for agriculture use, forest land, timberland, or timberland production; or identified as a site under a Williamson Act contract. Therefore, no Project-level or cumulative impacts to agriculture and forestry resources would occur.

Air Quality (except for consistency with the Air Quality Management Plan [AQMP], regional emissions during construction (VOC) and operations (NO_X), and odors during operation): As discussed on pages IV.B-32 through IV.B-34 and IV.B-54 through IV.B-55 in Section IV.B, Air Quality, of the Draft EIR, and summarized in Table IV.B-10 *Prcject Consistency with the General Plan Air Quality Element,* of the Draft EIR, the Project would not conflict with the City's General Plan Air Quality Element (Air Quality Element) owing to regulations, required Public Right of Way improvements, Project Design Features, and the Project Site location in a HQTA.

As discussed on pages IV.B-41 through IV.B-42 in Section IV.B, Air Quality, of the Draft EIR and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, For the Project, as shown in Table IV.B-14, Project operation would generate a maximum daily emission of 135 pounds per day of nitrate oxide (NOx) which would exceed the regional significance threshold by 80 pounds per day. However, the changes in regional emissions generated by the Project are too small a resolution (size of the Project Site and emissions quantity) for the Project to substantially affect the concentrations predicted in the SCAQMD's regional model for health risks. Therefore, while Project-related NOx emissions cumulatively contribute to the ozone and particulate matter nonattainment designations, the Draft EIR appropriately concluded that it would be speculative to determine the health consequences from the incremental increase in emissions because the Project is not large enough to provide meaningful results. However, as further indicated therein, localized screening thresholds (LSTs) are good indicators of the potential health impacts and, for all

the reasons discussed below, Project impacts for both construction-related and operational LST risk impacts would be less than significant.

As discussed on pages IV.B-42 through IV.B-44 in Section IV.B, Air Quality, of the Draft EIR and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, construction of the Project could generate new sources of criteria air pollutant and toxic air contaminants (TAC) emissions from construction equipment exhaust and fugitive dust. However, as shown on Table IV.B-15, *Maximum Daily On-site Construction Emissions*, construction-related activities would not generate emissions that would exceed the LSTs. Thus, Project-related construction emissions would not exceed the California Ambient Air Quality Standards (CAAQS), and Project construction would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized construction-related impacts would be less than significant.

As further discussed therein, the Project would elevate concentrations of both TACs and diesel particulate matter (DPM) in the vicinity of sensitive land uses during construction activities. However, the Project would not result in health risks because, as shown in Table IV.B-16, *Construction Risk Summary*, the maximum incremental cancer risk during the construction phase of the Project would not exceed the threshold of significance of 10 for cancer risks and 1 for chronic hazards for nearby sensitive receptors. Therefore, off-site health risk impacts associated with Project-related construction activities would be less than significant.

As discussed on pages IV.B-45 through IV.B-51 in Section IV.B, Air Quality, of the Draft EIR and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, while operation of the Project could generate new sources of criteria air pollutants and TACs in the Project area from area/stationary sources and mobile sources, as shown Table IV.B-17, *Maximum Daily On-site Operations Emissions*, localized maximum daily operational emissions would not exceed the screening level of LSTs. As further shown on Table IV.B-20, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and Appendix 5, Air Quality, Greenhouse Gas, and Health Risk Assessment Modeling Updates, of the Final EIR: the Project's contribution to the cumulative health risk will be relatively minor compared to the existing risks from off-site sources at the maximum exposed residential receptor; the cumulative risks at the maximum exposed senior living facility would not change substantially due to the Project in either 2022 or 2050; and there would be no change to cumulative health risks when the Project's contribution is added to existing sources for receptors at Amestoy Elementary School. Thus, Project-related operation emissions would not exceed the CAAQS and Project operations would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized operation-related impacts would be less than significant.

As further discussed on pages IV.B-48 through IV.B-50 in Section IV.B, Air Quality, of the Draft EIR, neither Project construction or operation would generate sufficient trips to create a carbon monoxide (CO) hotspot and, therefore, the Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the Project area, and impacts would be less than significant. As further indicated therein, and as shown on Table IV.B-19, *Construction and Operation Risk Summary*, the combined health risks from Project-related construction and operational activities for a 30-year residential scenario, which is the closest sensitive receptor to the Project Site, is below the threshold of significance value of 10 per million and the chronic hazard risk is less than the one threshold of significance for residents, seniors, schools, and day care centers. Therefore, the combined construction and operation of the Project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions, and health risk impacts would be less than significant.

As discussed on pages IV.B-54 through IV.B-57 in Section IV.B, Air Quality, of the Draft EIR and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, the Project's construction and operation LSTs, CO hotspots and health risks would not be cumulatively considerable since the South Coast Air Quality Management District has advised that projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. As further indicated therein for informational purposes, the Draft EIR includes an environmental justice evaluation which demonstrated that: (i) the emissions from sources near the Project Site are projected to greatly decrease over time, and (ii) the localized incremental cancer risks from nearby off-site sources plus the Project would decrease between 63 and 77 percent in 30 years, compared to existing 2020 emissions and the chronic and acute hazards are predicted to decrease between 63 and 74 percent and by 55 percent from 2020 to 2050, respectively.

For all the reasons summarized above, the Project-level and cumulative impacts related to conflict with the City's Air Quality Element, LSTs, CO hotspots and health risks would be less than significant.

As discussed on pages IV.B-51 through IV.B-56 in Section IV.B, Air Quality of the Draft EIR (as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR), during construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. However, construction-related odor emissions would be temporary and intermittent, confined to the immediate vicinity of the construction equipment, and cease upon the drying or hardening of odor-producing materials. As such, the Project's contribution to construction odor emissions would not be cumulatively considerable. Therefore, impacts associated with Project construction-generated odors would be less than significant.

(For the findings regarding construction regional emissions and odors during operation, see Section VI, Less than Significant with Mitigation, of these Findings. For the findings regarding operational NOx emissions and inconsistency with the AQMP, see Section VII, Significant and Unavoidable Impacts, of these Findings.)

Biological Resources: As discussed on pages VI-9 through VI-10 in Section VI, Other CEQA Considerations, of the Draft EIR and pages 34 through 36 of the Initial Study included in Appendix A of the Draft EIR, and Appendix F-7, the Biological Resources Assessment and Arborist Report, of the Final EIR, the Project Site is located in a urbanized environment and does not contain protected species, habitat for protected species, wetlands, or other sensitive biological resources. Therefore, Project-level and cumulative impacts to biological resources would be less than significant.

Cultural Resources: As discussed on page VI-10 in Section VI, Other CEQA Considerations, and Appendix D, *Cultural and Paleontological Resources,* of the Draft EIR, and on pages 36 through 38 of the Initial Study included in Appendix A of the Draft EIR, as the Project Site is currently vacant, and there are no identified, was determined to have low sensitivity for prehistoric cultural resources and buried historical archaeological features, as well as human remains. In the event of inadvertent discovery of either archeologic resources or human remains, a City standard condition of approval related to archaeological resources has been applied, and compliance with California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5 would govern inadvertent discovery of human remains. As a result, Project-level and cumulative impacts to cultural resources would be less than significant

Energy: As discussed on pages IV.D-14 through IV.D-28 in Section IV.D, Energy, of the Draft EIR, shown in the modeling of electricity and natural gas usage of the Project included in Appendix C, *Air Quality and Greenhouse Gas Emissions Technical Modeling,* of the Draft EIR, and as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the Project would consume energy during construction and operational activities, however, construction and operation would occur in accordance with applicable energy efficiency regulations, additional efficiency measures would be included in the Project, and the Project would be served by Los Angeles Department of Water and Power (LADWP) which is subject to State and City regulations regarding energy efficiency and use of renewal energy sources. Therefore, Project-level and cumulative impact to energy would be less than significant.

Geology and Soils: As discussed on pages IV.E-5 through IV.E-9 in Section IV.E, Geology and Soils, of the Draft EIR, the *Geotechnical Investigation* included in Appendix E and the *Cultural and Paleontological Resources Assessment* included in Appendix D of the Draft EIR, and on pages VI-10 through VI-11 in Section VI, Other CEQA Considerations, of the Draft EIR and pages 40 through 44, of the Initial Study included in Appendix A of the Draft EIR, and the Project's preliminary geotechnical engineering investigation included in the 2005 Krager Report contained in Appendix FEIR-2 of the Final EIR, the Project-level and cumulative impacts related to geology and soils would be less than significant.

Greenhouse Gas Emissions: As discussed on pages IV.F-32 through IV.F-51 in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and in the *Air Quality and Greenhouse Gas Emissions Technical Modeling* included in Appendix C of the Draft EIR, as updated in Appendix FEIR-5 of the Final EIR, the Project would generate greenhouse gas (GHG) emissions during construction and operation. However, the Project would: be subject to applicable GHG emission reduction and energy conservation requirements and implement Project Design Features which would reduce emissions; develop the Project Site in close proximity to the Ports of Los Angeles and Long Beach and the regional highway system, reducing VMT in the region and associated GHG emissions; and, include bicycle parking facilities and develop or improve the sidewalks adjacent to the Project Site thereby promoting pedestrian activity and non-vehicular modes of transportation to and from the Project Site. Although a quantitative analysis of GHG emissions was provided in the EIR, since there are no adopted thresholds of significance for GHG emissions, the Project was analyzed to determine if it would conflict with plans adopted to reduce GHG emissions. As discussed on pages IV.F-32 through IV.F-49, the Project would not conflict with such plans for all the reasons set forth on Table IV.F-5, *Prcject Consistency with Appliable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies,* (as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR), Table IV.F-6, *Prcject Consistency with SCAG's 2020-2045 RTP/SCS,* and Table IV.F-7, *Prcject Consistency with the Green New Deal,* of the Draft EIR, and further the Project would comply with the City's Green Building Code. As such, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG. Therefore, the Project-level and cumulative impacts related to GHG emissions would be less than significant.

Hazards and Hazardous Materials: As discussed on pages IV.G-24 through IV.G-32 in Section IV.G, Hazards and Hazardous Material, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to Draft EIR, of the Final EIR, and on page VI-12 in Section VI, Other CEQA Considerations, of the Draft EIR, page 51 in the Initial Study included in Appendix A of the Draft EIR, the Phase I Environmental Site Assessment and Phase II *Soil* and the *Soil Vapor Investigation Report* included in Appendices F-1 and F-2 of

the Draft EIR, the Soil Management Plan included in Appendix F-3 of the Draft EIR, the Response to SWAPE Letter Comments included in Appendix F-4 of the Draft EIR, and the LARWQCB [Los Angeles Regional Water Quality Control Board] Approved Workplan included in Appendix F-5 of the Draft EIR, and the Updated SCS Engineers Memorandum contained in Appendix FEIR-8 of the Final EIR, Project construction and operation would involve the use, storage and transportation of hazardous materials. However, the Project would: comply with Project Design Features HAZ-PDF-1 (soil management plan), as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and HAZ-PDF-2 (vapor intrusion mitigation system [VIMS]) to ensure that the hazards and hazardous materials encountered during construction and operation would result in less-than-significant impacts; comply with all relevant regulations and manufacturers specifications and instructions regarding the handling, disposal, transportation and accidental release or spill of hazards and hazardous materials; comply with the LARWQCB approved workplan for existing contaminates from prior uses; not be located within an airport land use plan or within two miles of a public airport or public use airport; not require the closure of any public or private streets during construction or operation; not impede emergency vehicle access to the Project Site or surrounding area; provide emergency access to and from the Project Site in accordance with requirements of the Los Angeles Fire Department (LAFD); be located in a highly urbanized, built-out portion of the City and outside of the Very High Fire Hazard Severity Zone designated by the California Department of Forestry and Fire Protection (CAL FIRE); and, not have a considerable contribution to a cumulative impact related to hazards and hazardous materials with compliance with applicable regulations. Therefore, with compliance with applicable regulations and implementation of the Project Design Features and LARWQCB's approved workplan, Project-level and cumulative impacts would be less than significant.

Moreover, as discussed on page IV.G-30 of the Draft EIR, the Project Site includes the remains (i) of two former manufacturing facilities (Virco on the western half and Electricord on the eastern half of the Project Site) and (ii) a former Arco gas station (located at the southwestern corner of the Project Site) where a total of seven USTs and associated dispensers and piping were removed in 1989. However, the LARWQCB issued closure for the former Arco gas station in a letter dated December 31, 2012; the LARWQCB issued a "No Further Action" determination for the Virco Cleanup Program case on September 13, 2011; approximately 750 tons of metals-impacted soil and 333 tons of petroleum hydrocarbon-impacted soil were excavated and removed from the former Virco portion of the Project Site; human health risk assessments (HHRAs) conducted in 2009 and 2010 to evaluate risks from volatile organic compounds (VOCs) in soil vapor found a low vapor intrusion risk to human health; and, the Office of Environmental Health Hazard Assessment (OEHHA) concurred with the HHRAs' finding. As further discussed therein, the former Electricord area (eastern half of the Project Site) is currently an active Cleanup Program Site overseen by the LARWQCB (Global ID SL0603729001) where six groundwater monitoring wells exist that are currently monitored on a semiannual basis and a workplan to install additional soil vapor and groundwater monitoring wells has been approved by the LARWQCB (Appendix F-5) and is planned for the near future. As such, grading and construction activities would not affect existing groundwater contamination, nor groundwater remediation or monitoring, which occurs at depths over 30 feet below the surface, below the excavation needed for the Project. For operational uses, the Project will include installation of a VIMS (Project Design Feature HAZ-PDF-2), beneath the proposed building to protect it from any potential for vapor intrusion. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. With installation of the VIMS, contaminated groundwater would not pose any health risk to future employees at the Project Site and, therefore, with the implementation of regulatory requirements and Project Design Feature HAZ-PDF-2, the risk of exposure of hazardous

materials due to the Project Site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

Hydrology and Water Quality: As discussed on pages IV.H-18 through IV.H-29 in Section IV.H, Hydrology and Water Quality, of the Draft EIR, pages VI-12 through VI-13 in Section VI, Other CEQA Considerations, of the Draft EIR, pages 13 through 15 of the Initial Study included in Appendix A of the Draft EIR, the Preliminary Hydrology Calculations included in Appendix G-1 of the Draft, the Low Impact Development for the South Bay Industrial Center included in Appendix G-2 of the Draft EIR, the Phase I Environmental Site Assessment and the Phase II Soil and Soil Vapor Investigation Report included in Appendices F-1 and F-2 of the Draft EIR, and the Soil Management Plan included in Appendix F-3 of the Draft EIR: Project construction and operational activities would be subject to applicable water quality, drainage and erosion requirements (including the preparation and implementation of a SWPPP pursuant to a Construction General Permit, utilization of best management practices [BMPs] as shown on Table IV.H-1, *Construction BMPs*, of the Draft EIR and implementation of the Low Impact Development [LID] Ordinance requirements, as well as implementation of Soil Management Plan (Project Design Feature HAZ-PDF-1), aAs revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, adherence with the Department of Water Resources Standards for wells and well closures, all of which would avoid the violation of water quality standards/waste discharge requirements and avoid substantial erosion. Water supply to the Project would be provided by LADWP and would not require the use of groundwater nor direct additions or withdrawals of groundwater. The Project would not reduce any existing percolation of surface water into the groundwater table; the Project Site is not located within the potential inundation area nor any water storage tanks or reservoirs; the Project would not impede or redirect flood flows nor is it located within a 100-year flood plain area, including the 100-year flood zone designated by the FEMA, nor is it in a tsunami, or seiche zone and is, therefore, not subject to inundation from 100-year floods, tsunamis or seiches. For all these reasons, the Project would not: violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge; result in substantial erosion/siltation; create runoff that exceeds stormwater drainage system capacity or create substantial polluted runoff; impede/redirect flood flows; risk release of pollutants due to inundation from 100-year floods, tsunamis or seiches; conflict with water quality or groundwater management plans; or result in a cumulatively significant contribution to cumulative impacts related to hydrology or water quality. As such, the Project-level and cumulative impacts related to hydrology and water quality would be less than significant.

Land Use and Planning: As discussed on page VI-13 in Section VI, Other CEQA Considerations, of the Draft EIR and on page 56 of the Initial Study contained in Appendix A of the Draft EIR, the Project would not divide an established community nor conflict with land use plan, policy or regulation, and therefore the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation or divide an established community and, as such, Project-level and cumulative impacts would not occur.

Mineral Resources: As discussed on page VI-13 in Section VI, Other CEQA Considerations, of the Draft EIR, and on page 57 of the Initial Study included in Appendix A of the Draft EIR, the Project Site is not in a State Mineral Resource Zone-2 (MRZ-2) or located in a State-designated oil field or within an oil drilling district. Therefore, the Project would not result in the loss of availability of mineral resources or locally important mineral resource recovery site, and, as such, would not contribute to a cumulative impact. Accordingly, Project-level and cumulative impacts would not occur.

Noise: As discussed on pages IV.I-25 through IV.I-33 in Section IV.I, Noise, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and the noise calculations contained in the Noise Appendices included in Appendix H of the Draft EIR, as updated in Appendix FEIR-2, Noise Modeling Updates, of the Final EIR, the Project would include Project Design Features which would result in reducing construction and operation noise compared to a project without such project design features. Moreover, as further stated therein, with implementation of these project design features, the Project's on-site and off-site construction and operational noise increase above ambient noise levels would not exceed the thresholds of significance for noise impacts. Additionally, as explained on pages IV.I-36 through IV.I-37 of the Draft EIR, the Project's contribution to cumulative noise impacts from construction and operation would not be cumulatively considerable As such, Project-level and cumulative impacts related to noise would be less than significant.

As discussed on pages IV.I-33 through IV.I-37 in Section IV.I, Noise, of the Draft EIR, Project generated vibrations would not result in damage to off-site structures nor human annoyance to sensitive receptors, nor combine for a cumulative impact to structures or human annoyance. As such, Project-level and cumulative impacts related to construction and operation groundborne vibration impacts resulting in damage to structures or in human annoyance would be less than significant.

As discussed on page VI-13 in Section VI, Other CEQA Considerations, of the Draft EIR, and on page 59 of the Initial Study included in Appendix A of the Draft EIR, the Project is not located within two miles of any public or public use airport or private air strips and, therefore, would not contribute to a cumulative noise impact related to airport uses. As such, there would be no Project-level and cumulative impacts related to exposing people residing or working in the Project area to excessive noise levels.

Population and Housing: As discussed on pages VI-13 through VI-14 in Section VI, Other CEQA Considerations, of the Draft EIR, and on page 60 of the Initial Study included in Appendix A of the Draft EIR, the Project would not result in displacement of people or housing;; the Project would not induce substantial population growth in the Project area, either directly or indirectly; and, the Project would not exceed regional or local growth projections. As such the Project would have less-than-significant impacts on population and no impacts on housing, and, as such, would not contribute to a cumulative impact. Therefore, Project-level and cumulative impacts on population and housing would be less than significant.

Public Services - Fire: As discussed on page VI-14 in Section VI, Other CEQA Considerations, of the Draft EIR and on pages 61 through 62 of the Initial Study contained in Appendix A of the Draft EIR, the Project not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, and, as such, would not have a cumulatively considerable impacts. Therefore, Project-level and cumulative impacts related to fire services would be less than significant.

Public Services - Police: As discussed on page VI-14 in Section VI, Other CEQA Considerations, of the Draft EIR and on page 62 in the Initial Study contained in Appendix A of the Draft EIR, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection, and, as such, would not have a cumulatively considerable impacts. Therefore, Project-level and cumulative impacts related to fire services would be less than significant.

Public Services - Schools, Parks and Other Public Facilities: As discussed on page VI-15 in Section VI, Other CEQA Considerations, of the Draft EIR and on page 62 in the Initial Study contained in Appendix A of the Draft EIR, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection and, therefore, the Project would not have a cumulatively considerable impact on schools, parks, or other public facilities. Therefore, no Project-level or cumulative impact to schools, parks, or other public facilities would occur.

Recreation: As discussed on page VI-15 in Section VI, Other CEQA Considerations, of the Draft EIR and on page 63 in the Initial Study contained in Appendix A of the Draft EIR, the Project would not require the construction or expansion of recreational activities which might have an adverse physical effect on the environment. The Project would not contribute to an impact on recreational facilities. Therefore, no Project-level and cumulative impacts related to recreational facilities would occur.

Transportation: As discussed on pages IV.J-20 through IV.J-29 and IV.J-33 in Section IV.J, Transportation, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and the Transportation Assessment Report included in Appendix I1 of the Draft EIR, and as shown in Table IV.J-4, *Questions to Determine Prcject Applicability to Plans, Policies, and Programs,* and Table IV.J-5, *Consistency Analysis with Mobility Plan 2035 Goals*, the Project would not conflict with relevant City plans, policies and programs related to transportation and circulation and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives.

As discussed on pages IV-30 through 34 in Section IV.J, Transportation, of the Draft EIR, and on pages VI-15 through VI-16 in Section VI, Other CEQA Considerations, of the Draft EIR, and on pages 64 through 65 in the Initial Study contained in Appendix A of the Draft EIR, and the Transportation Assessment, and LADOT reports included in Appendix I of the Draft EIR, and the Supplemental Maneuvering Studies contained in Appendix FEIR-4 of the Final EIR, the Project would not have a significant impact related to increased hazards due to geometric design or incompatible use, and the freeway off-ramp vehicle queuing analyses would not exceed the 85 percent storage length in the Future Year 2022 With Project conditions.

In addition, the Project would not require the closure of any public or private streets during construction or operation, would not impede emergency vehicle access to the Project Site or surrounding area, and would not result in any substantial changes that would affect access of emergency vehicles. Therefore, the Project would result in less than significant impacts related to transportation.

Tribal Cultural Resources: As discussed on pages IV.K-8 through IV.K-10 in Section IV.K, Tribal Cultural Resources, of the Draft EIR, and the Cultural and Paleontological Resources Assessment Report, contained in Appendix D, of the Draft EIR, and as discussed in detail in Section IV.C, Cultural Resources, of the Draft EIR, the search of relevant records and pedestrian surveys indicate that no Native American cultural resources are located in or near the Project Site and, thus, the Project Site has low sensitivity for tribal cultural resources. However, the City's standard condition of approval to address the inadvertent discovery of tribal cultural resources has been applied to the Project insuring temporary halting of construction activities near the encountered resource and measures regarding treatment and disposition of any discovered tribal cultural resources. Given the lack of known tribal resources at or near the Project Site and compliance with the City's standard

condition of approval, the Project's contribution to a cumulative impact to tribal cultural resources would not be cumulatively significant. Therefore, Project-level and cumulative impacts to tribal cultural resources would be less than significant.

Utilities and Service Systems: As discussed on pages VI-16 through VI-17 in Section VI, Other CEQA Considerations, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and on pages 68 through 71 in the Initial Study contained in Appendix A of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, in the Final EIR, Project construction and operation would not exceed the water, wastewater, electrical, telecommunications, or solid waste systems' capacities. Therefore, Project-level and cumulative impacts related to the construction or relocation of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects, related to water supply, and related to solid waste reduction goals would be less than significant.

Wildfire: As discussed on page VI-18 in Section VI, Other CEQA Considerations, of the Draft EIR, and on pages 72 through 74 in the Initial Study contained in Appendix A of the Draft EIR: the Project Site is not in or near an State Responsibility Area (SRA) or Local Responsibility Area (LRA) or lands classified as Fire Hazard Severity Zones (FHSZ); there is no wildland vegetation in, adjacent to or in proximity of the Project Site. Therefore, no Project-level or cumulative impact related to wildfire would occur.

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

1. Air Quality (regional construction emissions and operation odor emissions only)

a) Impact Summary:

(i) Regional Construction Emissions: As discussed on pages IV.B-35 through IV.B-39 in Section IV.B, Air Quality, of the Draft EIR, Project construction would entail asphalt demolition, on-site processing of asphalt demolition debris, grading, trenching, construction, paving of the surface parking lot and internal circulation, landscaping, and architectural coating. These activities, and in particular the application of architectural coating and off-gas emissions associated with asphalt paving, would generate volatile organic compounds (VOCs) during construction that would exceed the thresholds of significance for VOCs. As such, Project-level and cumulative impacts related to regional construction emissions would be significant without mitigation.

(ii) Operation Odor Emissions: As discussed on pages IV.B-52 through IV.B-56 in Section IV.B, Air Quality, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, Project operation of industrial uses has the potential to generate odors from trucks associated with daily

operations and trash storage areas. While the Project would comply with all applicable regulations including SCAQMD Rule 402 for nuisance, additional measures may be necessary to prevent an odor nuisance to nearby sensitive receptors. As such, Project-level and cumulative impacts related to operation odors would be significant without mitigation.

2) Project Design Features: The City finds that Project Design Features AQ-PDF-4 and AQ-PDF-5, located on page IV.B-28 in Section IV.B, Air Quality, of the Draft EIR, and in Section IV, Mitigation Monitoring Program, of the Final EIR, and set forth below, are incorporated into the Project to contribute to minimizing air quality emissions.

AQ-PDF-4: The proposed building will be designed and built to meet the standard for LEED Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program.

AQ-PDF-5: All forklifts used on-site will be electric-powered.

c) Mitigation Measures: The City finds that Mitigation Measures AQ-MM-1, AQ-MM-2 and AQ-MM-7, located on pages IV.B-37 and IV.B-52 through IV.B-53 in Section IV.B, Air Quality, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and in Section IV, Mitigation Monitoring Program, of the Final EIR, and set forth below and incorporated into the Project, would reduce the potentially significant regional construction emissions impacts and operation odor impacts to less than significant.

AQ-MM-1 During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 25 grams per liter or less for all interior and exterior building coatings. This mitigation measure shall be noted on all construction plans verified by the City of Los Angeles Department of Building and Safety and Department of City Planning prior to issuance of any construction permits and during coating activities.

AQ-MM-2 During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 50 grams per liter or less for all surface parking lot striping. This mitigation measure shall be noted on all construction management plans verified by the City of Los Angeles Department of Building and Safety and Department of City Planning prior to issuance of any construction permits and during parking lot coating activities.

AQ-MM-7 Prior to issuance of a Business License for a use that has potential to generate nuisance odors beyond the property line (see list below or as determined by the City of Los Angeles Department of City Planning), an odor management plan shall be prepared by the Project developer/facility owner and tenant/business entity and submitted to City of Los Angeles Department of City Planning and Office of Finance for review and verification. Uses that have the potential to generate nuisance odors include, but are not limited to:

- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations

- Large-capacity coffee roasters
- Chemical-processing facilities
- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The odor management plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the site plan and submitted to the City of Los Angeles Department of City Planning and Office of Finance for verification.

d) Finding: Pursuant to PRC Section 21081(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

e) Rationale for Finding:

(i) Regional Construction Emissions: As discussed on pages IV.B-35 and IV.B-39 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, construction activities would temporarily increase particulate matter (PM_{10} and $PM_{2.5}$), VOCs, nitrogen oxide (NOx), sulfur dioxide (SO_2), and CO regional emissions in the South Coast Air Basin (SCAB). The primary source of NOx, CO, and SO_2 emissions is the operation of construction equipment while the primary sources of PM_{10} and $PM_{2.5}$ emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving. Project construction would entail asphalt demolition, on-site processing of asphalt demolition debris, grading, construction of the proposed land use, trenching, paving of the surface parking lot and internal circulation, landscaping, and architectural coating. However, as shown on Table IV.B-11, *Maximum Daily Regional Construction Emissions*, of the Draft EIR, while the Project's regional construction emissions would not exceed levels of significance for NOx, CO, SO_2, PM_{10} and $PM_{2.5}$, it would exceed the level of significance for VOCs. Since the primary source of VOC emissions is architectural coating and asphalt paving, the Project would incorporate Mitigation Measures AQ-MM-1 and AQ-MM-2 to reduce the VOC emissions below the level of significance. Specifically, AQ MM-1 requires use of paints with a VOC content of 25 grams per liter or less for all interior and exterior building coatings and AQ-MM-2 requires use paints with a VOC content of 50 grams per liter or less for all surface parking lot striping. As shown in Table IV.B-13, *Maximum Daily Regional Construction Emissions With Mitigation*, of the Draft EIR, incorporation of Mitigations Measures AQ-MM-1 and AQ-MM-2 would reduce Project-related construction emissions of VOC to below its regional significance threshold. Therefore, regional construction emissions impacts would be reduced to less than significant with mitigation.

(ii) Operation Odor Emissions: As discussed on pages IV.B-52 through IV.B-53 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, while Project uses are not the typical type of use that generate objectionable odors (such as, without limitation, wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations, dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities), potential sources of Project odors include trucks associated with daily operations and trash

storage areas. While it is unlikely that odors from trucks and the trash storage areas would become a nuisance because they would be minimized due to the relatively small scale and amount of odors these sources can generate relative to the distance of the nearest off-site receptors, in addition to compliance with SCAQMD Rule 402 regarding nuisance odors, the Project's industrial uses may still generate some nuisance odors which could impact nearby sensitive receptors. Thus, since the types of businesses which could be accommodated under the Project could result in generating odors from processes that occur on-site, additional measures may be necessary to prevent an odor nuisance associated with other sources that may be generated at the Project Site. To reduce the potential for nuisance odors from the Project Site, Mitigation Measure AQ-MM-7 would require the development of an odor management plan. Specifically, AQ-MM-7 requires that, prior to issuance of a business license for a use that has potential to generate nuisance odors beyond the property line, an odor management plan shall be prepared by the Project developer/facility owner and tenant/business entity and submitted to City of Los Angeles Department of City Planning and Office of Finance for review and verification. Mitigation Measure AQ-MM-7 would ensure that odor impacts are minimized, and that facilities would comply with SCAQMD Rule 402. Therefore, Project operation-related odor impacts would be reduced to less than significant with mitigation.

(iii) Cumulative Air Quality Impacts: As discussed on pages IV.B-53 through IV.B-54 and IV.B-57 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, of the Final EIR, the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental air quality topics analyzed in an EIR because projects that do not exceed the project-specific thresholds are generally not cumulatively significant. As discussed above, the Project's regional construction emissions would be less than significant with implementation of Mitigation Measure AQ-MM-1 and AQ-MM-2 which would reduce VOC emissions below the level of significance. Therefore, with mitigation, the Project's contribution to a cumulative regional air quality impact would not be cumulatively considerable. As such, the Project's cumulative construction-related impact to regional air quality emissions would be reduced to less than significant with mitigation.

f) Reference: For a complete discussion of air quality, please see Section IV.B, Air Quality, and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR. and Section III, Revisions, Clarifications and Corrections to the Draft EIR, and Appendix FEIR-5, Air Quality, Greenhouse Gas and Health Risk Assessment Modeling Updates, of the Final EIR.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XII below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction

and operation of the Project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the Project as described in the Statement of Overriding Considerations for the construction and operation of the Project and implementing actions.

1. Air Quality – (Conflict with AQMP and regional operation emissions [NOx] only)

a) Impact Summary:

(i) Conflict with AQMP: As discussed on pages IV.B-28 through IV.B-32 and IV.B-34 in Section IV.B, Air Quality, of the Draft EIR, Project operation represents an increase in emissions compared to existing conditions. The Project would generate long-term emissions of criteria air pollutants that would not exceed SCAQMD's regional operation-phase significance thresholds for VOC, CO, SO_2, PM_{10}, or $PM_{2.5}$ but would exceed the significance threshold for NOx. Thus, implementation of the Project would result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of the Ambient Air Quality Standards (AAQS). Therefore, the Project would be inconsistent with the AQMP. Project Design Features AQ-PDF-1 through AQ-PDF-6 and Mitigation Measures AQ-MM-3 through AQ-MM-9 would contribute to minimizing air quality emissions and therefore conflicts with the AQMP but would not reduce the impact to a less-than-significant level. As such, the Project's impacts related to Project-level and cumulative conflicts with the AQMP would be significant and unavoidable.

(ii) Regional Operation Emissions: As discussed on pages IV.B-52 through IV.B-53 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR

b) Project Design Features: The City finds that Project Design Features AQ-PDF-1 through AQ-PDF-6, located on page IV.B-28 in Section IV.B, Air Quality, of the Draft EIR, and in Section IV, Mitigation Monitoring Program, of the Final EIR, and set forth below, are incorporated into the Project to contribute to minimizing air quality emissions.

AQ-PDF-1: The Project will install a minimum of 20 electric vehicle charging stations for electric passenger vehicles with an additional 38 stalls capable of supporting future electric vehicle chargers.

AQ-PDF-2: The Project will include at least six tractor trailer parking stalls capable of supporting future electric vehicle supply equipment.

AQ-PDF-3: The Project will install a solar photovoltaic (PV) system that will generate a minimum of 460,000 kilowatt-hours per year (kWh/yr) of renewable electricity.

AQ-PDF-4: The proposed building will be designed and built to meet the standard for LEED Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program.

AQ-PDF-5: All forklifts used on-site will be electric-powered.

AQ-PDF-6: The Project will install a roof with a Solar Reflectance Index (SRI) of 25 or better to reduce surface temperature, heat island effect, and heat transfer to the interior of the structure.

c) Mitigation Measures: The City finds that Mitigation Measures AQ-MM-3 through AQ-MM-6 located on pages IV.B-37 through IV.B-38 in Section IV.B, Air Quality, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and Mitigation Measures AQ-MM-8 and AQ-MM-9 located in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, and in Section IV, Mitigation Monitoring Program, of the Final EIR, and set forth below and incorporated into the Project, would reduce potential impacts of NOx emissions during Project operation.

AQ-MM-3 Only electric-powered off-road equipment (e.g., yard trucks/hostlers) shall be utilized on-site for daily warehouse and business operations. The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation to use only electric-powered off-road equipment shall be included all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the Project developer/facility owner and tenant/business entity shall provide to the City of Los Angeles Department of City Planning and Office of Finance a signed document (verification document) noting that the Project development/facility owner has disclosed to the tenant/business entity the requirement to use only electric-powered equipment for daily operations. This verification document shall be signed by authorized agents for the Project developer/facility owner and tenant/business entities. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the City of Los Angeles Department of City Planning and Office of Finance to verify, to the City's satisfaction, that any off-road equipment utilized will be electric-powered.

AQ-MM-4 To reduce idling emissions from transport trucks, signage shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict non-essential idling to no more than two consecutive minutes; and (3) telephone numbers of the building facilities manager, CARB, and South Coast Air Quality Management District to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the City of Los Angeles Department of City Planning shall note the locations of these signs. Prior to issuance of a building permit, the final construction monitoring report shall include verification that signage has been installed.

AQ-MM-5 All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City of Los Angeles Department of City Planning to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric-powered.

AQ-MM-6 All transport trucks utilized for daily operations shall have engines that meet the California Air Resources Board's 2010 engine emissions standards specified in California Code of Regulations, Title 13, Article 4.5, Chapter 1, Section 2025 (i.e., 0.01 gram per brake horsepower-hour (g/bhp-hr) of particulate matter and 0.20 g/bhp-hr of NO_X emissions). The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the aforementioned truck/engine requirement shall be included all leasing agreements.

Prior to issuance of a Business License for a new tenant/business entity, the Project developer/facility owner and tenant/business entity shall provide to the City of Los Angeles Department of City Planning and Office of Finance a signed document (verification document) noting that the Project developer/facility owner has disclosed to the tenant/business entity the truck requirement for daily operations and tenant/business entity shall comply with the provisions of this mitigation measure. This verification document shall be signed by authorized agents for the Project developer/facility owner and tenant/business entities.

AQ-MM-8 All emergency generators used for operation shall be powered by a non-diesel fuel. Prior to the issuance of a building permit for the construction of the warehouse, the property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City of Los Angeles Department of City Planning to verify, to the City's satisfaction, that all emergency generators are powered by a non-diesel fuel.

AQ-MM-9 The number of truck trips associated with the Project shall not exceed 768 trips per day, consistent with the truck trip levels analyzed in the Project's Environmental Impact Report (ENV-2017-1015-EIR and SCH No. 2017121007). Prior to construction, the Project Applicant shall submit proof of retention of a licensed transportation consultant to the Department of City Planning. Prior to the issuance of building permits, the Project Applicant shall develop a Truck Trip Monitoring Plan to the satisfaction of Los Angeles Department of Transportation (LADOT) and Department of City Planning. The Monitoring Plan shall be developed in consultation with the licensed transportation professional. The Monitoring Plan shall establish protocol for conducting monitoring of truck trips (e.g., appropriate software or equipment, placement of monitoring equipment, establishing protocol for addressing mechanical or human error, information on shifts, trips per shift, and operating hours, etc.), on-site circulation management strategies to maintain on-site safety, ensure idling restriction compliance, and ensure a safe and orderly pedestrian and vehicle environment when trucks enter and exit the public-right-of-way. The Monitoring Plan shall also identify staff responsible for on-site monitoring, and when truck trips reach 95% of the daily cap or (729) trips; the plan shall include notification and management protocols to ensure compliance with the cap. The Monitoring Plan shall also include protocols in the event the Daily Trip Cap is exceeded. Protocols shall include a process to notify the Department of City Planning of the exceedance, recommendations to reattain compliance with the established trip cap, and a subsequent California Environmental Quality Act (CEQA) review of the impacts (if any) resulting from the exceedance. The Monitoring Plan shall include documentation (e.g., a

letter, advisory notice, or similar written documentation) confirming that the Project Applicant and/or future tenant will implement the Monitoring Plan during Project operation. During Project operation, the Project Applicant shall submit an annual report on compliance with the truck trip monitoring plan to the Department of City Planning and LADOT, and within 15 days of a request for a report by the Department of City Planning or LADOT; however, after the submission of five annual compliance reports, the Department of City Planning has the discretion to no longer require the submission of annual compliance reports. LADOT may at any time request and shall be granted permission to audit or observe the monitoring on site.

AQ-MM-10 The Applicant/facility owner and tenant/business entity shall prepare an odor management plan for any use that has potential to generate nuisance odors beyond the property line (see list below or as determined by the City of Los Angeles Department of City Planning) which shall be implemented and included in the Air Quality Operational Implementation Plan identified in AQ-MM-9. Uses that have the potential to generate nuisance odors include, but are not limited to:

- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Chemical-processing facilities
- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The odor management plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the site plan and submitted to the City of Los Angeles Department of City Planning.

d) Finding: Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. However, these effects have not been reduced to a less than significant level.

Thus, pursuant to PRC, Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the Environmental Impact Report.

e) Rationale for Finding:

(i) Conflict with AQMP: As discussed on pages IV.B-28 through IV.B-32 and IV.B-34 in Section IV.B, Air Quality, of the Draft EIR, and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, a project would have a significant impact if it would conflict with or obstruct implementation of the applicable air quality plan. The two applicable air quality plans for the Project are the AQMP and the City's Air Quality Element. While Project operation would not conflict with the Air Quality Element

for all the reasons discussed in Table IV.B-10, *Prcject Consistency with the General Plan Air Quality Element*, of the Draft EIR, it would conflict with the AQMP. The Project would generate long-term emissions of criteria pollutants which are those pollutants for which the federal and State government have established ambient air quality standards for outdoor concentrations. As shown on Table IV.B-12, *Maximum Daily Regional Operational Phase Emissions*, of the Draft EIR, the Project's operation-related regional emissions would not exceed the SCAQMD's regional operation-phase significance thresholds for criteria pollutants VOC, CO, SO_2, PM_{10}, or $PM_{2.5}$ but would exceed the significance threshold for NOx. Thus, implementation of the Project would result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of the AAQS.

As further discussed therein, due to the exceedance of the regional significance threshold for NOx, Mitigation Measures AQ-MM-3, AQ-MM-4, AQ-MM-5, AQ-MM-6, AQ-MM-8 and AQ-MM-9 are incorporated into the Project to reduce operation-related NOx impacts. Generally, implementation of Mitigation Measure AQ-MM-3 would limit off-road equipment used in daily operations; Mitigation Measure AQ-MM-4 would reduce idling emissions from transport trucks; Mitigation Measure AQ-MM-5 would limit landscaping equipment to be electric-powered only; Mitigation Measure AQ-MM-6 would require transport trucks to be installed with engines that meet CARB's 2010 emissions standards; AQ-MM-8 would require that emergency generators be powered by non-diesel fuel; and, AQ-MM-9 would require additional environmental review if the number of truck trips to the Project Site exceeds the number analyzed in the EIR. Implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6 and AQ-MM-8 through AQ-MM-9 would reduce NOx emissions to the extent possible. However, as shown in Table IV.B-14, *Maximum Daily Regional Operational Phase Emissions with Mitigation*, of the Draft EIR, the Project would still result in emissions that exceed the regional significance threshold for NOx. Therefore, while the Project would incorporate project design features and mitigation measures which would contribute to a reduction in emissions which would reduce impacts related to conflicts with the AQMP, because emissions of NOx would still exceed the regional significance threshold, the Project would be in conflict with the AQMP. As such, while incorporation of project design features and implementation of mitigation measures would reduce emissions, Project operation-related conflicts with the AQMP would remain significant and unavoidable.

(ii) Regional Operation Emissions (NOx): As discussed on pages IV.B-36 through IV.B-40 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, Project operation would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). Long-term air pollutant emissions generated by a warehousing development are typically associated with mobile sources involving the burning of fossil fuels in cars and trucks; energy use for cooling, heating, and manufacturing; and area sources, such as architectural coatings, landscape equipment, and off-road equipment used for daily operations. As shown in Table IV.B-12, *Maximum Daily Regional Operational Phase Emissions*, of the Draft EIR, Project-related air pollutant emissions from daily operations would exceed the SCAQMD's regional emissions threshold for NOx.

As further indicated therein, the Project would generate up to 1,977 weekday average daily traffic (ADTs) consisting of 1,209 passenger vehicle ADTs and 768 medium- and heavy-heavy duty truck ADTs. As such, the primary sources of long-term criteria air pollutant emissions would be Project-generated vehicle trips. Since the Project would exceed the NOx level of significance, the Project would result in a potentially significant impact because it would contribute to the nonattainment designations of the SCAB. In order to reduce the NOx emissions, the Project would implement Mitigation Measures AQ-MM-3 to limit off-road

equipment used in daily operations, Mitigation Measure AQ-MM-4 to reduce idling emissions from transport trucks, Mitigation Measure AQ-MM-5 to limit landscaping equipment to be electric-powered only, Mitigation Measure AQ-MM-6 to require transport trucks to be installed with engines that meet CARB's 2010 emissions standards, AQ-MM-8 to ensure that emergency generators are not diesel powered, and AQ-MM-9 to ensure that the number of truck trips does not exceed the 768 trips analyzed in the EIR without further environmental review. Implementation of these mitigation measures would reduce NOx emissions to the extent possible. The Project will also be subject to the SCAQMD's Warehouse Indirect Source Rule 2305 and Rule 316, which are programs focused on reducing emissions from vehicles that service large warehouses which may further reduce the Project's estimated emissions. However, even with implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6, as shown in Table IV.B-14, *Maximum Daily Regional Operations Emissions With Mitigation*, of the Draft EIR, Project-related operation-phase emissions would still exceed the NOx regional significance threshold. Therefore, regional operation emissions impacts would remain significant and unavoidable.

(iii) Cumulative Impacts: As discussed on pages IV.B-36 through IV.B-40 and IV.B-53 and IV.B-57 in Section IV.B, Air Quality, of the Draft EIR and in Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR, projects that exceed Project-level thresholds of significance for criteria pollutants would have significant contribution to a cumulative air quality impact. As further discussed therein, emissions of NOx that exceed the SCAQMD regional threshold would cumulatively contribute to the ozone and particulate matter nonattainment designations of the SCAB. Implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6, AQ-MM-8 and AQ-MM-9 would reduce emissions to the extent possible. However, Project-related operation-phase emissions would still exceed the NOx regional significance threshold. Therefore, even with the incorporation of project design features and implementation of mitigation measures, the Project would cumulatively contribute to the nonattainment designations of the SCAB. As such, Project operation-phase cumulative impacts related to conflicts with the AQMP and regional emissions of NOx would remain significant and unavoidable.

f) Reference: For a complete discussion of air quality, please see Section IV.B, Air Quality, and Appendix C, Air Quality and Greenhouse Gas Emissions Technical Modeling, of the Draft EIR and Section III, Revisions, Clarifications and Corrections to the Draft EIR, and Appendix FEIR-5, of the Final EIR.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the Project's significant impacts.

A. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project

to a level that is less than significant, or avoid any significant effect the project would have on the environment.

B. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) further states that "the statement of objectives should include the underlying purpose of the project."

As set forth in the Section II, Project Description, of the Draft EIR (as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR), the Project's underlying purpose is to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy. The Project's specific objectives are as follows:

1. Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.

2. Provide for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce.

3. Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.

4. Improve pedestrian access, connectivity, and safety in proximity to residences and schools.

5. Enhance the Project Site's visual aesthetics through redevelopment of a vacant and underutilized property.

C. Alternatives Analyzed

1. Alternative A: No Project/No Build Alternative

a) Description of Alternative: As stated on page V-9 in Section V, Alternatives, of the Draft EIR, the No Project/No Build Alternative (Alternative A) assumes that the Project would not be approved and no new development would occur within the Project Site. The physical conditions of the Project Site would remain as they are today, consisting of vacant, disturbed land. The Project Site would remain unoccupied, surrounded by a chain link fence with three large concrete slab foundations, and paved with asphalt and concrete in poor condition. No new construction would occur.

b) Impact Summary: As discussed on pages V-9 through V-15 in Section V, Alternatives, of the Draft EIR, Alternative A would eliminate the Project's significant and unavoidable operation air quality impacts. While not developing the Project Site would result in Alternative A having no impacts, Alternative A would have greater impacts than the Project related to aesthetics, hazards and hazardous material,

and hydrology and water quality since it would not develop the vacant property, which is in poor condition, nor would it result in remediation of the Project Site, nor would it result in installation of drainage improvements and LID water quality features and, therefore, runoff would continue to flow, untreated, into the storm drains. Additionally, Alternative A would not meet any of the Project objectives.

c) Finding: Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

d) Rationale for Finding: As discussed on pages V-9 through V-15 in Section V, Alternatives, of the Draft EIR, since Alternative A would not develop the Project Site, it would eliminate the Project's operation air quality impacts. Specifically, by remaining in its current, vacant condition, Alternative A would not generate additional operational emissions related to vehicular traffic or the consumption of energy. Therefore, no operational air quality impacts associated NOx emissions would occur. However, since no development would occur under Alternative A, Alternative A would have greater impacts related to aesthetics, hazards and hazardous materials, and hydrology and water quality, in part because: (i) The visual character of the Project would remain in its current condition which is a vacant, underutilized lot in an urbanized area, surrounded by a chain link fence, with three large concrete slab foundations and paved asphalt in fair to poor condition, and littered with trash. Additionally, since no development would occur, there would be no new landscaping, including 165 trees, no improved sidewalks, no improved lighting, and no visual improvements to the Project Site or adjacent streets. Accordingly, Alternative A would not contain the aesthetically beneficial features of the Project. As such, Alternative A would result in no impact related to aesthetics but the impact would be greater when compared to the less than significant impacts of the Project. While the Project would implement Project Design Feature HAZ-PDF-1 (Soil Management Plan) to address contamination from prior uses at the Project Site, since there would be no development under Alternative A, there would be no remediation of the Project Site. As such, Alternative A would result in no impact related to hazardous and hazardous materials, but the impact would be greater when compared to the less than significant impacts of the Project. As no development would occur, Alternative A would not include the drainage improvements and water quality features that would be installed under the Project. Therefore, runoff would continue to flow, untreated, into the storm drain adjacent to the Project Site. Therefore, water quality impacts, including erosion and sedimentation would be greater under Alternative A than under the Project because the Project Site would not receive benefit from the stormwater drainage and water quality filtration features that would be constructed by the Project. As such, Alternative A would result in no impact related to hydrology and water quality but the impact would be greater when compared to the less than significant impacts of the Project. As further stated therein, and summarized in Table V-1, *Summary of Comparison of Alternatives to the Prcject*, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, under Alternative A all other environmental impacts would be less than the Project's less than significant, less than significant with mitigation, and significant and unavoidable impacts. However, as stated on page V-15 and summarized in Table V-2, *Summary of Prcject Objectives Comparison of Alternatives to the Prcject*, since there would be no new development under Alternative A, this alternative would not accomplish the Project's underlying purpose nor any of the Project Objectives.

e) Reference: For a complete discussion of Alternative A, please see Section V, Alternatives, of the Draft EIR.

2. Alternative B: Existing Zoning Alternative

a) Description of Alternative: As described on page V-15 in Section V, Alternatives, of the Draft EIR, the Existing Zoning Alternative (Alternative B), would develop the Project Site with up to 150,000 square feet of retail uses consistent with the existing M2 zoning on the Project Site which allows for industrial and commercial uses, which include retail uses. Although building square footage would be reduced under Alternative B, total lot coverage would be similar to the Project due to an increased area necessary for parking to accommodate retail uses. The proposed building height would be reduced from 53 feet under the Project to 45 feet under Alternative B.

b) Impact Summary: As stated on pages V-15 through V-24 in Section V, Alternatives, of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, Alternative B would eliminate the Project's significant and unavoidable operational air quality impact related to the exceedance of the regional significance threshold for NOx. As further discussed therein, Alternative B's other air quality, GHG emissions, energy, and construction on-site noise and operational noise impacts would be less than the Project due to a shorter construction duration and a reduction the size of the building, while impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction-related off-site noise, and tribal cultural resources, would be similar to the Project. However, transportation and GHG emissions impacts would be greater under the Alternative B due to due to the increase in VMT per employee, and associated GHG emissions, generated by the retail use. Additionally, Alternative B would not meet the Project's underlying purpose or Project Objectives 1 and 2 since it would not develop a warehouse/manufacturing/high-cube warehouse/distribution center, but it would meet Project Objects 4, 5 and 6 since there would be some development that would improve the Project Site and pedestrian access, create jobs, and enhance tax revenues.

c) Finding: Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

d) Rationale for Finding: As stated on pages V-15 through V-24 in Section V, Alternatives of the Draft EIR, and summarized in Table V-1, *Summary of Comparison of Alternatives to the Prcject*, as with the Project, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, construction of Alternative B 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 Project Site and from fugitive dust emissions resulting from demolition and construction activities. However, under Alternative B, even though the overall amount of building construction would be reduced by approximately 56 percent, since air quality impacts are based on the maximum daily emissions, construction air quality would be similar to the Project. As further stated therein and shown in Appendix L2, Trip Generation and VMT Forecast – Existing Zoning Alternative, of the Draft EIR, in respect to operational air quality impacts, Alternative B would result in a decrease VMT by approximately 23 percent when compared to the Project due to the proposed change in use from industrial warehouse to retail development and associated reduction in truck trips. As vehicular emissions depend on VMT, vehicular sources would result in a decrease in air emissions when compared to the Project. The reduction in emissions associated with the reduction in VMT, mobile source truck trips,

and building operation, would reduce NOx emissions below the NOx regional significance threshold of 55. Therefore, impacts associated with regional operational emissions would be less than that of the Project and would eliminate the Project's significant and unavoidable operation air quality impacts. As to all other air quality impacts, Alternative B's impacts would be similar to or less than the Project primarily due to the reduced development.

As further discussed therein, while the total VMT would be reduced under Alternative B, the VMT per employee would increase from 9.7 under the Project to 9.9 under Alternative B. As such, Alternative B's transportation impacts would be less than significant but greater than the Project's less than significant impacts. Further, other environmental impacts including other air quality emission, GHG emissions, energy, and construction on-site noise and operational noise impacts would be less than the Project due to a shorter construction duration and a reduction the size of the building proposed under Alternative B and impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction-related off-site noise, and tribal cultural resources, would be similar to the Project's less than significant and less than significant with mitigation impacts.

Nonetheless, as further stated therein, and summarized in Table V-2, *Summary of Prcject Objectives Comparison of Alternatives to the Prcject,* although Alternative B would not meet the underlying purpose of the Project to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy, or meet Project Objectives 1 and 2 regarding development of warehouse uses that are responsive to local, regional, national and international trade demands and commerce, Alternative B would meet Project Objectives 4, 5 and 6 since it would provide economic benefits through the creation of new employment opportunities and the generation of property tax revenues, would improve pedestrian access, connectivity and safety, and would enhance the visual aesthetics of the Project Site.

e) Reference: For a complete discussion of Alternative B, please see Section V, Alternatives, of the Draft EIR.

3. Alternative C: Reduced Project Alternative

a) Description of Alternative: As described on page V-24 in Section V, Alternatives, of the Draft EIR, the Reduced Project Alternative (Alternative C) would develop the same warehouse/manufacturing/high-cube warehouse/distribution center uses as the Project but the development would be reduced by approximately 25 percent. Specifically, under Alternative C, the proposed building would be reduced from 340,298 square feet under the Project to 255,224 square feet under Alternative C with similar improved area for parking spaces and landscaped area. Vehicular access to the Project Site would remain the same with one right-in/right-out driveway on Vermont Avenue, one right-in/right-out driveway at Redondo Beach Boulevard, and two full access driveways at Orchard Avenue. Truck access would continue to occur at Vermont Avenue and the northerly Project driveway at Orchard Avenue. Alternative C would also implement a similar building design and height and implement similar lighting, signage, vehicular and pedestrian access, and sustainability features as those proposed for the Project and require the same discretionary approvals as the Project. However, due to the reduced amount of construction, the duration of construction would be less than the Project.

b) Impact Summary: As described on pages V-24 through V-33 in Section V, Alternatives, of the Draft EIR, as Alternative C would develop all the same uses but development would be reduced by approximately 25, all the environmental impacts would be the similar to or less than the Project's less than significant, less than significant with mitigation, and significant and unavoidable impacts. Specifically, as to the significant and unavoidable operation air quality impacts associated with NOx emissions, even with a 25-percent reduction in mitigated emissions (with implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6, AQ-MM-8 and AQ-MM-9), Alternative C's operational NOx emissions would still exceed the regional significance threshold of 55 pounds per day. Therefore, impacts associated with regional operational emissions would be less than the Project but would remain significant and unavoidable. As to the other environmental impacts, Alternative C would lessen impacts associated with construction-related regional and localized and operational localized air quality, energy, GHG emissions, and construction related on-site and operational off-site traffic noise due to a shorter construction duration and a reduction the size of the building and impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction related off-site and operational on-site stationary noise, transportation, and tribal cultural resources would be similar to the Project. Additionally, as Alternative C would develop the same uses, Alternative C would meet the Project's underlying purpose and all of the Project Objectives, but generally to a lesser extent than the Project due to the 25 percent reduction in development.

c) Finding: Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

d) Rationale for Finding: As stated on pages V-24 through V-33 in Section V, Alternatives, of the Draft EIR, and shown in Table V-1, *Summary of Comparison of Alternatives to the Prcject,* Alternative C would construct the same uses, comply with the same regulatory requirements, include the same project design features and implement the same mitigation measures as the Project. However, Alternative C's impacts would be similar to or less than the Project's impacts because Alternative C would reduce the scope of development and operation by approximately 25 percent. As further explained therein, as to the Project's significant and unavoidable air quality impacts related to NOx emissions during Project operation, Alternative C would not reduce the impact to a less-than-significant level. Similar to the Project, Alternative C's operational regional air pollutant emissions would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Although Alternative C would result in fewer daily trips and VMT than the Project, even with a reduction in trips and a 25 percent reduction in scale, and implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6, AQ-MM-8 and AQ-MM-9, Alternative C's operational emissions would result in approximately 137 pounds per day of NOx, which would still exceed the regional significance threshold of 55 pounds per day. Therefore, impacts associated with regional operational emissions and conflicts with the AQMP would be less than the Project but would remain significant and unavoidable.

As further explained therein, due to the reduced size of Alternative C compared to the Project, Alternative C construction impacts would occur over a shorter period of time and operational impacts would be reduced commensurate with a 25 percent reduction in the development. Specifically, since Alternative C would include all the same project design features and mitigation measures as the Project, the Project's less than significant with

project design features and/or mitigation measures impacts related to air quality, hazards and hazardous materials, noise and transportation impacts would be reduced compared to the Project's less than significant impacts and less than significant impacts with mitigation.

As to air quality impacts, including those due to TAC emissions from DPM sources, as stated on pages V-25 through V-26, other than impacts associated with NOx emissions, impacts from air emissions and fugitive dust from site preparation and construction activities would be similar to the Project because the level of air quality emissions is based on the maximum daily emissions. Overall construction air quality emissions generated by Alternative C would be less than those of the Project and, thus, impacts due to TAC emissions and the corresponding individual cancer risk would be less than significant and less than the less than significant impacts of the Project because Alternative C would require less overall construction. As to operational emissions, as further discussed therein, Alternative C's air quality impacts, other than impacts related to NOx emissions, would be less than the Project's less than significant impacts, in part due to the reduction in the size of the development, the reduction in net new peak-hour trips, and the reduced number of transport trucks. Similar to the Project, Alternative C would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, other than impacts related to NOx emissions, air quality under Alternative C would be less than significant and less than the less than significant impacts of the Project.

For all the reasons stated on pages V-24 through V-33, and summarized in Table V-1, Alternative C would lessen impacts associated with construction-related regional and localized and operational localized air quality, energy, GHG emissions, and construction related on-site and operational off-site traffic noise due to a shorter construction duration and a reduction the size of the building which would be constructed. Further, impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction related off-site and operational related on-site stationary noise, transportation, and tribal cultural resources would be similar to the Project since the reduced size of Alternative C would not reduce these impacts. However, as summarized in Table V-2, *Summary of Project Objectives Comparison of Alternatives to the Project*, while Alternative C would redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy, thus meeting the Project's underlying purpose, it would meet the underlying purpose to a lesser extent than the Project because of Alternative C's 25 percent reduction in operations. Specifically, due to the reduced scale of development, Alternative would meet Project Objectives 2 and 3 to a lesser extent than the Project. However, Alternative C would meet Project Objectives 1, 4, and 5 to the same extent as the Project as it would develop the same uses, improve pedestrian access, connectivity, and safety, and enhance the Project Site's visual aesthetics.

e) Reference: For a complete discussion of Alternative C, please see Section V, Alternatives, of the Draft EIR.

D. Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the

factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

1. **Alternative Project Site:** As stated on page V-4 in Section V, Alternatives, of the Draft EIR, an alternative site was considered and rejected in part because an alternative site could potentially lead to the Project being located closer to sensitive uses or produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared to the Project. As further stated therein, the Project Site is uniquely suited for the Project, in part because: its proximity to freeways provides direct access to the Ports of Los Angeles and Long Beach and promotes goods movement in a location with superior access to freeways, thereby reducing truck traffic and associated emissions along local streets; and, it allows the Project to be developed on a site that would serve as a buffer between existing surrounding land use and the California Waste Services Station for open air transfer and recycling services located northeast of the Project Site. Additionally, the Project Site is owned by the Project Applicant and the Project Applicant cannot reasonably acquire, control, or access an alternative site of similar size within the Harbor Gateway and, even if it could, an alternative site would result in the same significant and unavoidable impacts associated with air quality. Therefore, an alternative site would not be feasible as the Project Applicant does not own or control another suitable site and an alternative site would not avoid the Project's significant impacts.

2. **Alternative Land Use:** As stated on pages V-4 through V-5 in Section V, Alternatives, of the Draft EIR, alternative land uses such as, but not limited to, apartments plus open space, mixed-use plus college uses, mixed-use plus small warehouse, and governmental facilities were considered and rejected in part because: the Project Site is zoned for M2 Light Manufacturing uses where by-right development of the site is primarily limited to certain commercial and industrial land uses; residential uses and mixed-use residential developments are not permitted within the zone; schools and certain government facilities are only permitted through a discretionary entitlement process; and, such alternative uses do not meet the underlying purpose of the Project to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy, nor do such uses support local, regional, national, and international trade demands and commerce.

3. **Alternative to Reduce Building Height:** As stated on page V-5 in Section V, Alternatives, of the Draft EIR, an alternative which would reduce the building height was considered and rejected, in part because: as the Project would not result in a significant aesthetic impact, reducing building height would not eliminate or substantially reduce any significant environmental impacts of the Project; the Project's proposed building would be comparable in height with other surrounding buildings such as the Gardena Professional Medical Plaza and the Hustler Casino; and, Project's proposed building would not be overbearing to pedestrians or a disruptive structure in the public right-of way.

4. **Alternative to Restrict Operations to 12 Hours Per Day:** As stated on page V-5 in Section V, Alternatives, of the Draft EIR, an alternative to restrict operations to 12 hours per day to reduce noise impacts was considered and rejected in part because: the Project would not result in significant operational related noise impacts due to increased traffic (including truck trips), mechanical equipment, or loading dock

activity; and, the Project would incorporate several project design features to reduce operational noise impacts, including Project Design Features N-PDF-3 which prohibits us of back-up beepers for vehicles between the hours of 10:00 p.m. and 7:00 a.m., and N-PDF-4 which prohibits loading and unloading within 300 feet of any existing residential building between the hours of 10:00 p.m. and 7:00 a.m. As such, this alternative would not reduce any of the Project's significant impacts.

5. Alternatives to Eliminate Significant Air Quality Impacts: As stated on pages V-5 through V-6 in Section V, Alternatives, of the Draft EIR, this alternative was considered and rejected in part because the only way to reduce the Project's operational air quality impact to less than significant and allow for similar industrial warehouse uses, consistent with the City's zoning, would be to reduce the Project by approximately 60 percent to achieve air emissions below the SCAQMD's regional operation significance threshold for NOx emissions of 55 pounds per day. A 60-percent reduction of the Project would not support the Project's main objectives to the same degree as the Project, including the following: to provide for the development of warehouse uses that are responsive to and support local, regional, national, and international trade demands and commerce; and, to provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City and the Harbor Gateway.

E. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects of the Project.

As stated on page V-33 in Section V, Alternatives, of the Draft EIR, and summarized in Table V-1, *Summary of Comparison of Alternatives to the Project*, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, a comparative evaluation of the alternatives indicates that the Alternative A is the environmentally superior alternative as it would not involve any changes to the existing conditions and, therefore, not result in significant NOx emissions, although leaving the Project Site in its current condition would result in greater impacts related to aesthetics, hazards and hazardous materials, and hydrology and water quality compared to the Project and would not achieve any of the Project objectives. Among the remaining alternatives, Alternative C is the environmentally superior alternative in part because Alternative C represents a reduced density development that is in accordance with existing zoning and land use designations allowed within the Project Site. However, while Alternative C would reduce the Project's significant and unavoidable operational air quality impacts related to NOx emissions, it would not eliminate this significant impact. All other impacts would be less than or similar to those of the Project. In addition, Alternative C would only partially meet the Project's objectives to provide the entitlements and framework for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce and to provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.

IX. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project Site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Section VI of the Draft EIR, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

1. **Building Materials and Solid Waste:** As discussed on page VI-3 in Section VI, Other CEQA Considerations, of the Draft EIR, construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable such as lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics). As discussed on page VI-17 in Section VI.6, Effects Found Not to be Significant, of the Draft EIR: during construction of the Project, a minimum of 50 percent of construction and demolition debris would be diverted from landfills; Project solid waste generation would be within the Sunshine Canyon landfill's remaining permitted capacity; the Project would comply with local solid waste policies and objectives that further goals to divert waste from landfill disposal; and, the Project would comply with the California Integrated Waste Management Act of 1989, which was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible, all of which would reduce the consumption of non-renewable building materials. Therefore, Project impacts with respect to consumption of non-renewable building materials, generation of solid waste, and compliance with federal, State, and local solid waste regulations would be less than significant.

2. **Water:** As discussed on pages VI-3 through VI-4 in Section VI, Other CEQA Considerations, of the Draft EIR: the Project would generate the need for approximately 32,669 gallons per day (gpd) of water and the addition of approximately 340,298 square feet of warehouse/manufacturing/high-cube warehouse/distribution center use would be consistent with Citywide growth and buildout projections assumed in the 2015 Urban Water Management Plan (UWMP); and, the Project would be required to implement a water conservation strategy and demonstrate a minimum 20-percent reduction in indoor water usage when compared to baseline water demand. Therefore, impacts related to the availability of adequate water supplies to serve the Project from existing entitlements and reasonably foreseeable future development during normal, dry and multiple dry years would be less than significant. As such, while the Project would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

3. **Energy Consumption and Air Quality:** As discussed on pages VI-4 through VI-5 in Section VI, Other CEQA Considerations, of the Draft EIR, construction activities for the Project would not require the consumption of natural gas but would require the use of electricity and fossil fuels. However, the electricity demand would vary throughout the construction period based on the construction activities performed and would cease

upon completion of construction; electric equipment would be powered off when not in use; and the construction contractors would be required to minimize non-essential idling of construction equipment during construction, in accordance with applicable law. Therefore, Project-related construction activities would not result in wasteful or unnecessary energy demands. As further indicated therein, operation activities for the Project would result in an increase in electricity and natural gas demand from existing condition. However, the increased demand would be within the anticipated service capabilities of the LADWP and SoCal Gas. Moreover, as explained therein and on pages IV.D-14 through IV.D-28 in Section IV.D, Energy, of the Draft EIR, Project construction and operation would occur in accordance with applicable energy efficiency regulations such as the CALGreen Code and Title 24 (Building Energy Efficiency Standards) as well as include conservation measures beyond these requirements including incorporating Project Design Features AQ-PDF-3 (roof-top solar photovoltaic system), AQ-PDF-4 (LEED Silver certification), AQ-PDF-6 (solar reflectance roof). With compliance with the applicable codes and incorporation of project design features, Project use of electricity would not be wasteful or unnecessary. Similarly, because the Project would be built to meet the Building Energy Efficiency Standards, Project use of natural gas, would not result in wasteful or unnecessary natural gas demands. As further indicated therein, the Project's consumption of transportation fuel would not be wasteful or unnecessary because the Project would: provide opportunities for employment for residents of the City with nearby amenities and public transit options; comply with the CALGreen Code; include bicycle racks and storage for employee use, which would encourage employees to bicycle to work; include air quality Project Design Features AQ-PDF-1 (electric vehicle charging stations), AQ-PDF-2 (future support for electric vehicle supply equipment), and AQ-PDF-5 (electric-powered forklifts), all of which would reduce use of fossil fuels, as well as, implement TDM Program measures pursuant to Project Design Feature T-PDF-3 to decrease the number of vehicular trips generated by persons traveling to/from the Project Site by offering specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, walking, and bicycling) and ridesharing. Thus, these features of the Project would contribute toward minimizing VMT and transportation-related fuel use and reducing air quality emissions. Accordingly, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. In addition, Project operations would not conflict with adopted energy conservation plans.

4. **Environmental Hazards:** As discussed on pages VI-5 through VI-6 in Section VI, Other CEQA Considerations, of the Draft EIR, Project construction activities would include the routine use of materials, such as fuels, lubricants, and greases in construction equipment and coatings used in construction and, as discussed on page IV.G-26 in Section IV.G, Hazards and Hazardous Materials, of the Draft EIR, Project operation may involve the use of small amounts of hazardous materials, such as industrial cleansers, greases, and oils for cleaning and maintenance purposes, common to all urban developments, as well as the transport, use, and disposal of hazardous materials; however, the precise materials are not known, as the tenants of the proposed warehouses are not yet defined, but any such hazardous materials would only be stored and transported to and from the Project Site. As further indicated therein, the Project's transport, use, and disposal of hazardous materials during construction and operations would occur in accordance with the manufacturers' specifications for each material, as well as in conformance with applicable federal, State, and local regulations governing the use, storage, transport and disposal of hazardous materials; construction hazardous materials would not be in large quantities nor stored in such a manner as to pose a significant safety hazard and would be short term, ceasing upon completion of the construction phase; and, construction workers would be trained in safe handling and hazardous materials use. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials. Therefore, the

Project would not cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

X. Growth-Inducing Impacts

Section 15126.2(e) 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. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As discussed on pages VI-6 through VI-7 in Section IV, Other CEQA Considerations, of the Draft EIR, with regards to population growth, the Project proposes a new industrial center and does not propose any residential uses that could generate direct population growth as a result of housing opportunities. While the Project would create temporary construction-related jobs, construction workers would not be expected to relocate to the Project vicinity because the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. As further discussed therein, the area surrounding the Project Site is already developed with residential, commercial, light industrial, and institutional uses, the Project Site is located within an urban area that is currently served by existing utilities and infrastructure, and the Project would not result in removing an obstacle to population growth. Further, the Project would connect to existing infrastructure systems and would not require relocation or construction of new infrastructure facilities but would upgrade existing electric power systems to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen standards (Title 24, Part 11) and would provide rooftop solar or other renewable energy system to offset the office electrical consumption. Additionally, as discussed in Section VI.6, Effects Not Found to be Significant, of the Draft EIR, in Section VI, Other CEQA Considerations, of the Draft EIR, the Project is anticipated to result in an increase of approximately 250 jobs which is well within the employment projections for the cities of Los Angeles and Gardena and the Project would have no significant or a less than significant impact on public service facilities. Therefore, the Project would not result in a significant direct or indirect growth-inducing impact related to housing, employment, utilities and infrastructure, or removing obstacles to population growth which would tax existing community service facilities requiring construction of new facilities that could cause significant environmental effects. As such, the Project would not result in a significant growth-inducing impact.

XI. Energy Conservation

As discussed on page II-23 in Section II, Project Description, of the Draft EIR and in Section IV, Environmental Impact Analysis, and specifically in Sections IV.B, Air Quality, IV.D, Energy, and IV.F, Greenhouse Gas Emissions, of the Draft EIR, the Project would include the following energy conservation measures: those measures required by State and local regulations including CALGreen; and, design features and attributes promoting energy efficiency and sustainability including Project Design Features AQ-PDF-1 (requiring 20 electric charging stalls for electric passenger vehicles with an additional 38 stalls capable of

supporting future electric vehicle chargers), AQ-PDF-2 (requiring at least six tractor trailer parking stalls capable of supporting future electric vehicle supply equipment), AQ-PDF-3 (requiring a rooftop solar installation or other renewable energy power source sized to offset the expected electrical consumption of the tenant), AQ-PDF-4 (requiring that the building be designed and built to meet the standard for LEED Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program), AQ-PDF-5 (requiring the use of electric powered forklifts), and AQ-PDF-6 (requiring the installation of a solar reflectance roof).

XII. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the Project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in Section IV, Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to: air quality impacts related to regional emissions significance threshold for NOx during operation, conflicts with the AQMP due to exceedance of NOx emissions during Project operation, and cumulative impacts related to exceedance of NOx emissions during operation.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the Project discussed 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 each of the Project's benefits, as listed below, outweigh and override the significant unavoidable impacts relating to air quality impacts associated with exceedance of the threshold of significance for NOx emissions during Project operation.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide 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. Each of the listed Project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the Project despite the Project's identified significant and unavoidable environmental impacts. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies 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 Project's Freeway Adjacency Would Limit or Reduce Truck Trips in Residential or Other Sensitive Neighborhoods.** The Project includes development of an industrial building that could house a warehouse, a manufacturing use, a high-cube warehouse, or a distribution center on a site with direct access to an adjacent freeway one block to the east. As the site is located so closely to transportation infrastructure, trucks visiting the Project would be able to avoid residential neighborhoods and other sensitive uses located farther from the freeway. The Project Site location adjacent to transportation infrastructure, such as Interstate-110, or the Harbor Freeway, provides more efficient means to transport and store goods that are removed in and out of the region.

- **The Project Would Support City and Regional Land Use and Environmental Goals**. The Project would substantially improve the existing conditions on the Project Site as it would redevelop a vacant, underutilized property into a warehouse/ manufacturing/high-cube warehouse/distribution center that (i) is adjacent to nearby transportation infrastructure, such as Interstate 110 (Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles, which is consistent with the goals and objectives of the Harbor Gateway Community Plan, (ii) supports the objectives and policies of applicable larger-scale regional and local land uses plans, including SCAG's 2020-2045 RTP/SCS strategy of increasing employment within HQTAs as the Project Site is within an identified HQTA and is anticipated to provide up to 250 jobs; and (iii) provides goods to the regional economy. The Project would also provide improvements to the pedestrian network by installing new or upgraded paved sidewalks along the three roadways that front the Project Site. Furthermore, the Project would provide public transit improvements by installing a shelter and transit information, including route and system maps, schedules, estimated travel times, and real-time travel times. These proposed improvements could contribute to increasing bicycle and pedestrian trips and public transit use thereby supporting the State and City environmental goal of reducing automobile emissions. Moreover, the Project would not conflict with the zoning of the Project Site, which is zoned M2-1, which permits the Project's warehouse/manufacturing/high-cube warehouse/ distribution center uses.

- **The Project Would Provide Economic Development, Employment Opportunities, and Tax Revenue for the City.** The Project would provide the development of warehouse uses that are responsive to local, national, and international trade demands; create new employment opportunities within the City of Los Angeles and Harbor Gateway; and provide for economic growth by creating an estimated 250 jobs, and generating property and business license tax revenues, thereby supporting Objective 7.2 of the Framework Element's Economic Chapter.

- **The Project Would Represent Smart Growth.** The Project would develop a warehouse/manufacturing/high-cube warehouse/distribution center within a SCAG-designated HQTA and in close proximity to the Harbor Freeway and the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region. Furthermore, the Project would not require the extension of roads or utility infrastructure or result in urban sprawl. The Project would provide jobs in close proximity to existing housing, thereby contributing to jobs-housing balance. These characteristics are consistent with good planning practice, and would reduce VMT, fuel consumption, and associated GHG emissions.

- **The Project Would Represent Sustainable Development and Support the Transition to Sustainable Freight Transportation.** In addition to representing smart growth, as described above, the Project has been designed, and would be constructed, to incorporate environmentally sustainable building features and construction protocols required by the City's Green Building Code and CALGreen, while also incorporating additional energy conservation features and sustainability measures required to achieve LEED Silver certification pursuant to Project Design Feature AQ-PDF-4; implementing TDM Program measures pursuant to T-PDF-3; installing a minimum of 20 EV charging stations for electric passenger vehicles, with 38 stalls capable of supporting future EV chargers pursuant to AQ-PDF-1; and six tractor trailer parking stalls capable of supporting future EVSE pursuant to AQ-PDF-2; include a roof solar system pursuant to AQ-PDF-3; require electric powered forklifts pursuant to AQ-PDF-5; require installation of a solar reflectance roof pursuant to AQ-PDF-6; and would include bicycle parking. These Project features would reduce energy and water usage and waste generation and reduce associated GHG emissions and promote resource conservation.

- **The Project Would Enhance the Built Environment in the Project Site Vicinity.** The Project would provide new sidewalks along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue, upgraded with a full width sidewalk as well as curb and gutter. Additionally, the Project would provide new pavement with enough space to provide parking 194 automobiles. The design would replace a vacant lot surrounded by a chain link fence with three large concrete slab foundations and asphalt paving in poor condition, with a warehouse development that would: locate all loading and unloading within a fully-screened yard at the rear (north side) the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks; add landscaping to the northern end of both Vermont Avenue and Orchard Avenue and Vermont Avenue; improve unimproved sidewalk areas adjacent to the Project Site; provide dedications and improvements along all three street frontages, including reconstructing damaged sidewalks; and, provide 73,583 square feet of native landscaping, including approximately 166 on-site trees and installation of street trees within the newly constructed sidewalks along all street frontages abutting the Project Site.

XIII. General Findings

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 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, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, tribal cultural resources, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. 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. Textual refinements and errata were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated to describe refinements suggested as part of the public participation process.

5. 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.

6. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, 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 new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

    - 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.
    - 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.
    - 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 a feasible mitigation measure or alternative not included in the Final EIR.

- The mitigation measures identified for the Project were included in the Draft EIR and Final EIR. 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 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 Section 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of PRC Section 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 materials 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 regarding the project by the City and the other regulatory jurisdictions.

RECORD OF PROCEEDINGS

The record of proceedings for the decision includes the Record of Proceedings for the original CEQA Findings, including all items included in the case files, as well as all written and oral information submitted at the hearings on this matter. The documents and other materials that constitute the record of proceedings on which the City of Los Angeles' CEQA Findings are based are located at the Department of City Planning, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90021. This information is provided in

compliance with CEQA Section 21081.6(a)(2).

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at https://planning.lacity.org/project-review/environmental-review/published-documents (to locate the documents, select "Environmental Impact Reports (EIRs)" and search for the environmental case number) (ENV-2017-1015-EIR).

LOS ANGELES CITY PLANNING APPEAL FILING PROCEDURES

Entitlement and CEQA appeals may be filed using either the Online Application System (OAS) or in person Drop Off at DSC (Development Services Center).

Online Application System: The OAS (https://planning.lacity.org/oas) allows appeals to be submitted entirely electronically online; fee payment is by credit card or e-check.

Drop off at DSC: Appeals of this determination can be submitted in person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at http://planning.lacity.org/development-services/forms. Public offices are located at:

Metro DSC
(213) 482-7077
201 N. Figueroa Street
Los Angeles, CA 90012

Van Nuys DSC
(818) 374-5050
6262 Van Nuys Boulevard
Van Nuys, CA 91401

West Los Angeles DSC
(CURRENTLY CLOSED)
(310) 231-2901
1828 Sawtelle Boulevard
West Los Angeles, CA 90025

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable Los Angeles Municipal Code provisions.

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure that DSC staff members have adequate time to review and accept the documents, and to allow appellants time to submit payment.

QR Code to Online Appeal Filing

QR Code to Forms for In-Person Filing

Revised July 2023