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

Mitigated Negative Declaration

18618 West Oxnard Street Project

Case Number: ENV-2021-9032-MND

Project Location: 18618 Oxnard Street, Los Angeles, CA, 91356

Community Plan Area: Encino - Tarzana

Council District: 3—Blumenfield

Project Description: The Project Site is located on the south side of Oxnard Street, just east of Yolanda Avenue and west of Baird Avenue. The Site consists of one tax parcel containing a net area of 65,495 square feet (1.50 acres) and is located in the Encino - Tarzana Community Plan Area of the City of Los Angeles. The Site is currently designated for Limited Manufacturing land uses. The Project Site is currently zoned M1-1 and (Q)MR1-1 and is currently developed with a two-story building used for a trade school and a surface parking lot. The Project proposes to demolish a small portion of the existing building, and remodel the interior, as well as expand the building footprint by enclosing the courtyard on the east side of the Site and constructing a three-story addition on the south side of the Site. At completion, the Project would result in the development of a self-storage facility totaling approximately 97,846 net square-feet in size, with three stories and measuring a maximum of 44.4-feet in height. Twenty three vehicle parking spaces will be provided on-site along with 60 bicycle parking spaces. Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following:

1. **Vesting Zone Change:** A vesting zone change to remove the Qualified "Q" Condition on the southerly portion of the Project Site and change the (Q)MR1-1 zoning on the Site to M1.
2. **Conditional Use Permit:** A self-storage building proposed in the M1 Zone within 500 feet or less from an A or R Zone or residential use requires approval of a CUP. Properties to the east of the Project Site are zoned M1 and developed with residential uses.
3. **Conditional Use Permit:** For the proposed 44.4 foot-high addition on the south side of the Site to exceed the 37 foot height limit for a self-storage building. Pursuant to LAMC Section 12.24 F, in granting a CUP the decision may state that the height regulations required by other provisions of the Code shall not apply to projects requesting approval of a CUP.
4. **Conditional Use Permit:** A reduction to the number of parking spaces not to exceed 20-percent (LAMC Section 12.24-S). The 20-percent parking reduction would be calculated prior to the parking reduction for bicycle parking credits.
5. **Site Plan Review Approval:** A Site Plan Review approval is required since the Project proposes an overall increase of more than 50,000 gross square feet on non-residential floor area.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	CAJA Environmental Services, LLC 9410 Topanga Canyon Blvd., Suite 101 Chatsworth, CA 91311	PAL Oxnard, LLC 333 S. Hope Street, Suite 1600 Los Angeles, CA 90071

March 2022

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Appendices

1 INTRODUCTION

An application for the proposed 18618 West Oxnard Street Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (IS/MND) evaluates potential environmental effects resulting from construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this IS/MND, the City has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This Initial Study and Mitigated Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 Purpose of an Initial Study

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the Lead Agency may adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND).

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.).

1.2. Organization of the Initial Study

This Initial Study is organized into four sections as follows:

Section 1. Introduction: This Section provides introductory information such as the Project title, the Project Applicant, and identifies the lead agency for the Project.

Section 2. Executive Summary: This Section provides project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Project, including project characteristics, related project information and a list of requested discretionary actions.

Section 4. Evaluation of Environmental Impacts: This Section contains the completed CEQA Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3. CEQA Process

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

At the onset of the environmental review process, the City has prepared an IS/MND to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the proposed Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein. If this IS/MND and the Project are approved by the City, then within five days of the action, the City will file a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

2 EXECUTIVE SUMMARY

Project Title	**18618 West Oxnard Street**
Environmental Case No.	ENV-2021-9032-MND
Related Cases	CPC-2021-9031-VZC-CU-SPR

Project Location	**18618 West Oxnard Street, Los Angeles, CA 91316**
Community Plan Area	Encino-Tarzana Community Plan
General Plan Designation	Limited Manufacturing
Zoning	M1-1 and (Q)MR1-1
Council District	3 – Blumenfield

Lead City Agency	**City of Los Angeles Department of City Planning**
Staff Contact	More Song, City Planning Associate
Address	200 North Spring Street, Room 763, Los Angeles, CA 90012
Phone Number	(213) 978-1319
Email	more.song@lacity.org

Applicant	**PAL Oxnard, LLC**
Address	C/O 333 S. Hope Street, Los Angeles, CA 90071
Phone Number	213-576-1056

PROJECT DESCRIPTION

The Project proposes to demolish a small portion of the existing building, and remodel the interior, as well as expand the building footprint by enclosing the courtyard on the east side of the Site and constructing a three-story addition on the south side of the Site. At completion, the Project would result in the development of a self-storage facility totaling approximately roughly 97,846 net square-feet in size, with three stories and measuring a maximum of 44.4-feet in height. Twenty three vehicle parking spaces will be provided in on-site along with 60 bicycle parking spaces.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

ENVIRONMENTAL SETTING

The Project Site at 18618 Oxnard Street is located on the southern side of West Oxnard Street, just east of Yolanda Avenue and west of Baird Avenue, in the Encino - Tarzana Community Plan Area of the City of Los Angeles (City), in zip code 91356. The Site consists of one tax parcel containing a net area of 65,495 square feet (1.50 acres). The Site is currently developed with a two-story building used for a trade school and associated parking lot to the sides and rear of the Site.

The Site’s vicinity is urbanized with a mixture of housing, commercial, industrial, and institutional uses nearby. The adjacent property to the east is developed with a vacant lot and to the west, a branch of the Tarzana Treatment Centers, which has a similar split zoning with development of the southern portions of the lots restricted to parking only.

An apartment complex, within the R3-1 (Multiple Dwelling, Height District 1) Zone, is located south of the Site and to the north across Oxnard Avenue the property is zoned PF-1XL-RIO (Public Facilities, Height District Extremely Low, River Improvement District) and is developed with an animal feed store.

The north portion of the Site, from the property line south approximately 262 feet, is within the M1-1 Zone (Limited Industrial, Height District 1). However, the southern portion of the Site is zoned (Q)MR1-1 (Qualified Classification, Restricted Industrial, Height District 1) and uses are limited to those parking uses permitted in the MR1 Zone.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology / Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use / Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology / Soils	☐ Population / Housing	☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

HEATHER BLEEMERS	SENIOR CITY PLANNER
PRINTED NAME	**TITLE**
	MARCH 10, 2022
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes to demolish a small portion of the existing building, and remodel the interior, as well as expand the building footprint by enclosing the courtyard on the east side of the Site and constructing a three-story addition on the south side of the Site. At completion, the Project would result in the development of a self-storage warehouse facility totaling approximately 97,846 square-feet of floor area, with three stories and measuring a maximum of 44.4-feet in height. Twenty three vehicle parking spaces will be provided on-site along with 60 bicycle parking spaces.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site at 18618 Oxnard Street is located on the southern side of West Oxnard Street, just east of Yolanda Avenue and west of Baird Avenue, in the Encino - Tarzana Community Plan Area of the City of Los Angeles (City), in zip code 91356.

See **Figure 1, Regional Location Map**, for the location within the context of the City.

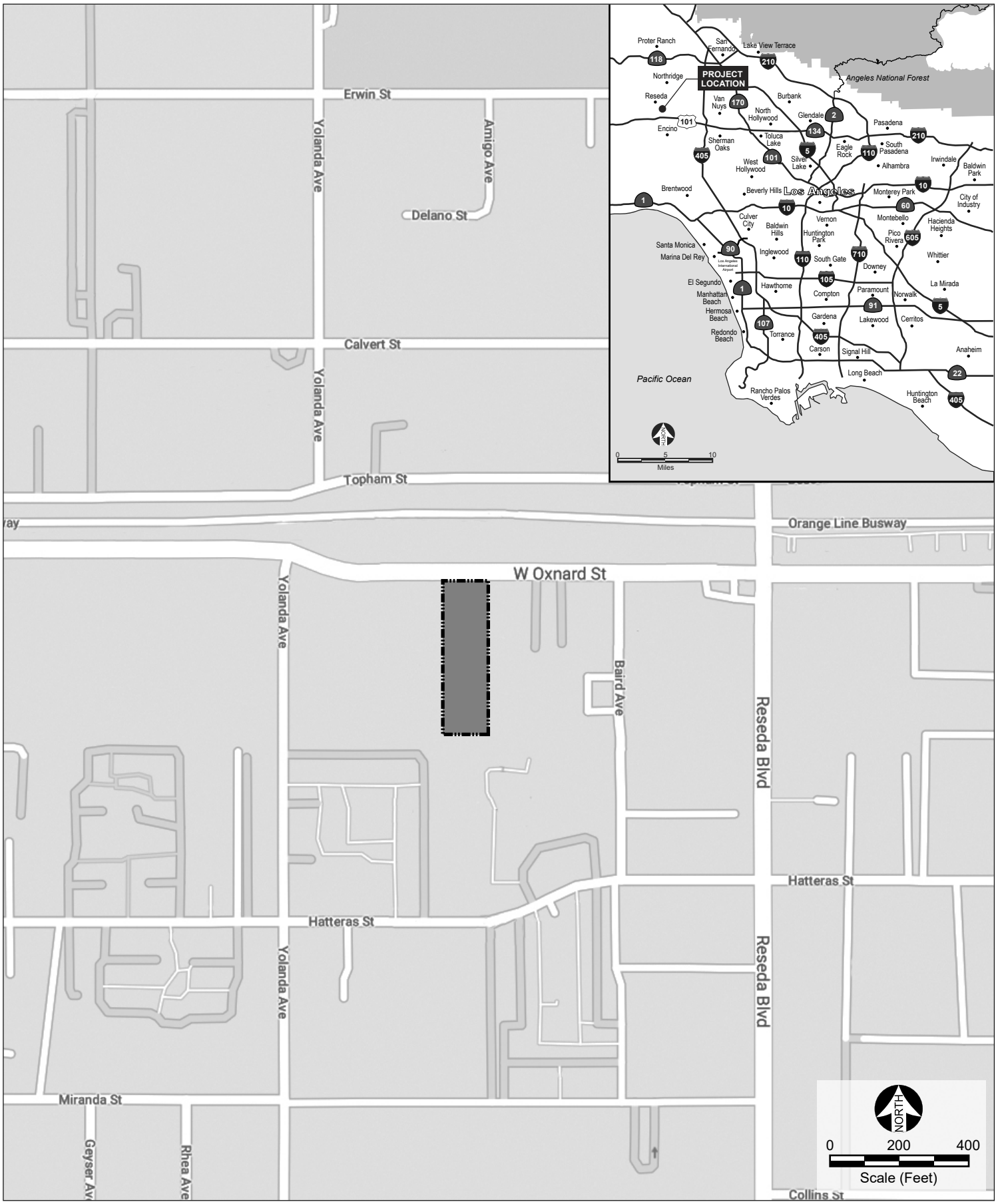
See **Figure 2, Aerial Map**, for an aerial of the Site and the immediate surrounding area.

3.2.2 Surrounding Land Uses

The Site's vicinity is urbanized with a mixture of housing, commercial, industrial, and institutional uses nearby.

The adjacent property to the east is a vacant lot and to the west, a branch of the Tarzana Treatment Centers, which has a similar split zoning with development of the southern portions of the lots restricted to parking only.

An apartment complex, within the R3-1 (Multiple Dwelling, Height District 1) Zone, is located south of the Site and to the north across Oxnard Avenue the property is zoned PF-1XL-RIO (Public Facilities, Height District Extremely Low, River Improvement District) and is developed with an animal feed store.



Legend

Project Site

Source: Google Maps 2022.

Figure 1
Regional Location Map

Legend

Project Site

Source: Google Maps 2022.

Figure 2
Aerial Map

3.2.3 Regional and Local Access

Regional access is provided by the Ventura Freeway (US-101) 1 mile south of the Project Site.

Local access is provided by:[1]

- Yolanda Avenue (Collector)
- Oxnard Street (Avenue II)
- Wilbur Avenue (Avenue II)
- Hatteras Street (Collector)
- Reseda Boulevard (Boulevard II).

3.2.4 Pedestrian Facilities

There are sidewalks along all the Project Site's boundaries. Crosswalks are provided at all legs of the nearest signalized intersections (Oxnard Street & Reseda Boulevard, east of the Site / Oxnard Street & Wilbur Avenue, west of the Site).

3.2.5 Public Transit

Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) provides the following services:

- Reseda Boulevard and Oxnard Street, east of the Site:
    - Metro G (Orange) Line Reseda Station
    - Metro Local Line 240

3.2.6 Planning and Zoning

The Site is located within the Encino - Tarzana Community Plan Area and has a General Plan Land Use designation of Limited Manufacturing. The Community Plan was adopted in December 1998 and the Department of City Planning ("DCP") is in the process of updating the plan. In December 2020, the proposed General Plan Land Use Designation Story Map was released, and Light Industrial is the proposed designation for the Site.

The north portion of the Site, from the property line south approximately 262 feet, is within the M1-1 Zone (Limited Industrial, Height District 1). However, the southern portion of the Site is zoned (Q)MR1-1 (Qualified Classification, Restricted Industrial, Height District 1) and uses shall be limited to those parking uses permitted in the MR1 Zone.

1 NavigateLA, Mobility Plan 2035 street designation.

The adjacent properties to the east, a vacant lot and to the west, a branch of the Tarzana Treatment Centers, have similar split zoning with development of the southern portions of the lots restricted to parking only.

See **Table 3-1** for details of the Project Site. The Site is also subject to the following zoning information (ZI):

- ZI-2498 Local Emergency Temporary Regulations - Time limits and Parking Relief – LAMC 16.02.1

- ZI-1117 MTA Right-of-Way (ROW) Project Area

Table 3-1
Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
18618 W. Oxnard Street	2156-006-018	(Q)MR1-1, M1-1	Limited Manufacturing	65,495
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, July 2021.				

3.2.7 Existing Conditions

The Site consists of one tax parcel containing a net area of 65,495 square feet (1.50 acres).

The Site is currently developed with a two-story building used for a trade school and associated parking lot to the sides and rear of the Site.

The existing building on-site would be reused, as proposed below.

There is one street tree (*Lagerstroemia Indica*) and 97 onsite trees.[2] There are no protected trees[3] or shrubs[4] on the Site.

The existing street tree will remain and will not be removed as part of the Project. The existing onsite trees will be removed. The tree removal will comply with the City's Urban Forestry Division removal requirements.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

2 Tree Inventory Report, Sheet 8 in the Plans, February 21, 2022.

3 LAMC Section 46.01: "PROTECTED TREE" means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: (a) Oak tree including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolía), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa). (b) Southern California Black Walnut (Juglans californica var. californica) (c) Western Sycamore (Platanus racemosa) (d) California Bay (Umbellularia californica) This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.

4 Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

The Project proposes to demolish a small portion of the existing building, and remodel the interior, as well as expand the building footprint by enclosing the courtyard on the east side of the Site and constructing a three-story addition on the south side of the Site. At completion, the Project would result in the development of a self-storage facility totaling approximately 97,846 net square-feet in size, with three stories and measuring a maximum of 44.4-feet in height.

The proposed use is permitted on the northern portion of the Project Site that is within the M1-1 (Limited Industrial, Height District 1) Zone. However, the southern portion of the Project Site is zoned (Q)MR1-1 (Qualified Classification, Restricted Industrial, Height District 1) parking is the only permitted use in this portion of the property.

The Project is requesting a vesting zone change ("VZC"), to remove the "Q" Qualified Classification on a portion of the property and change the MR1-1 designation on a portion of the property to M1-1. This request is necessary to permit the proposed self-storage use on the southern portion of the Site, and must be approved by the City Council.

3.3.2 Design and Architecture

See **Appendix A** of this MND for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated single structure with articulation and variation consistent with applicable City design guidance. The single-structure would be developed by using a portion of the existing structure coupled with renovation techniques consistent with LAMC requirements. Parking spaces would be on-grade and provided at the surface level with side entrance to the structure. Storage units within the building have been integrated into the overall architectural theme of the Project. With that, variation in building appearance is created with the use of various materials and massing of the existing structure with the new structure proposed for the Site. Additionally, the Project will be similar in size and scale to other commercial and limited-manufacturing multi-story structures in the vicinity of the Project Site.

3.3.3 Density & Floor Area

The Site is located in Height District No.1 and pursuant to LAMC Section 12.21.1-A.1, the maximum floor area ratio ("FAR") is 1.5:1. Therefore, the maximum building size permitted on the 65,495 square foot Site is 98,243 net square feet.

The Project consists of an existing 47,124 square foot structure to remain and will be remodeled for self-storage uses; an approximately 7,244 square-foot expansion of this existing building; the demolition of approximately 2,310 square feet of the existing building; and the construction of a new approximately 51,540 square-foot addition at the rear of the property.

Of this gross total, 5,752 square feet consists of deductible square footage (stair shafts, fire rooms, electrical rooms, elevator machine rooms, exterior walls, bicycle parking). With this deduction, the total proposed net floor area is 97,846 square feet (1.5:1 FAR). See **Table 3-2, Floor Area,** for the Project's total floor area and FAR.

Table 3-2
Floor Area

	Allowed	Provided (net)
Floor Area (sf)	98,243	97,846
FAR	1.5:1	1.5:1
Plans, KSP Architects, February 17, 2022.		

3.3.4 Setbacks

Table 3-3, Setbacks, provides the required and provided setbacks.

Table 3-3
Setbacks

Setbacks	Location	Required	Provided
Front	Oxnard Street	0’	5’
Side	West	0’	25’-2”
Side	East	0’	2’-1”
Rear	Multi-Family	0’	12’-7”
Plans, KSP Architects, February 17, 2022.			

3.3.5 Height

A maximum height limit does not apply to a property in the M1-1 Zone within Height District No. 1. However, for a self-storage use, the maximum building height is limited to 37 feet (LAMC Section 12.17.6 A.10). Roof structures for housing stairways, elevators, ventilation fans and mechanical equipment may exceed the maximum building height up to five feet (LAMC Section 12.21.1 A.3).

As proposed, the Project would be roughly 44.4 feet in total height, which is above the height limit for the Site. Accordingly, the Applicant is applying for a Conditional Use Permit to allow the proposed 44.4 foot-high building addition on the south side of the Site to exceed the 37-foot height limit for a self-storage building. Pursuant to LAMC Section 12.24 F, in granting a CUP, the decision may state that the height regulations required by other provisions of the Code shall not apply to projects requesting approval of a CUP.

3.3.6 Access and Circulation

Vehicle access (ingress/egress) would be provided via one driveway along Oxnard Street, providing access through the side of the building.

3.3.7 Vehicle and Bicycle Parking

Pursuant to LAMC Section 12.21 A.4(c)(1), the required number is parking spaces for a warehouse building (including a self-storage building), is one parking space for each 500 square feet of floor area for the first 10,000 square feet, and one parking space for each additional 5,000 square feet of floor area.

Pursuant to LAMC Section 12.21 A.4, automobile parking spaces for nonresidential projects or buildings located within 1,500 feet of a major transit stop, may replace up to 30 percent of the required automobile parking spaces with bicycle parking.

The Site is within 1,500 feet of the Metro G Line Reseda Station which allows 30% parking reduction with bicycle replacement.

Required parking spaces may be replaced by bicycle parking at a ratio of one standard or compact parking space for every four required or non-required bicycle parking spaces.

Also, the Project is requesting a 20-percent reduction of parking spaces per LAMC Section 12.24-S. The 20-percent parking reduction would be calculated prior to the parking reduction for bicycle parking credits. The Project would comply with the LAMC by providing 23 vehicle parking spaces and 60 bicycle parking spaces.

3.3.8 Lighting and Signage

Project signage would include building identification, wayfinding, and security markings. Signage would be similar to other signage in the Project's vicinity. No off-site signage is proposed.

Exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting would be integrated into the overall architecture and landscaping.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

3.3.9 Site Security

The Project would provide a security program to ensure the safety of its employees and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to interior areas; lighting of building entryways and areas; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems, and security lighting.

3.3.10 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC, effective January 1, 2020)[5] and the 2019 California Green Building Standards Code (CalGreen, effective

5 City of Los Angeles Department of Building and Safety, Green Building, available at http://ladbs.org/forms-publications/forms/green-building, accessed July 2021.

January 1, 2020).[6]

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for employees and visitors.

3.3.11 Anticipated Construction Schedule

The estimated construction schedule is shown in **Table 3-4, Construction Schedule**.

Table 3-4
Construction Schedule

Phase	Schedule	Duration (approx.)
Grading	1 month	Grading
Building Construction	10 months	Building Construction
Paving	1 month	Paving
Architectural Coatings	1 month [A]	Architectural Coatings

[A] The application of architectural coatings would overlap with paving activities.
Construction schedule, including start, end, and duration dates are estimates only.
Some overlap of phasing may occur.
The analysis assumes that construction would start in 2023. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

The estimated operational year is 2024.

The Project will demolish the existing vacant lot.

The number of materials imported will be approximately 600 cubic yards.[7] In addition, there will be demolition debris removal. Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within

6 California Building Codes: https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo, accessed July 2021.

7 Estimates provided by the Applicant, March 2922.

the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes.

3.4 REQUESTED PERMITS AND APPROVALS

In order to allow for development of the Project, the Project Applicant is requesting the following discretionary approvals from the City:

1. **Vesting Zone Change:** A vesting zone change to remove the Qualified "Q" Condition on the southerly portion of the Project Site and change the (Q)MR1-1 zoning on the Site to M1.

2. **Conditional Use Permit:** A self-storage building proposed in the M1 Zone within 500 feet or less from an A or R Zone or residential use requires approval of a CUP. Properties to the east of the Project Site are zoned M1 and developed with residential uses.

3. **Conditional Use Permit:** For the proposed 44.4 foot-high addition on the south side of the Site to exceed the 37 foot height limit for a self-storage building. Pursuant to LAMC Section 12.24 F, in granting a CUP the decision may state that the height regulations required by other provisions of the Code shall not apply to projects requesting approval of a CUP.

4. **Conditional Use Permit:** A reduction to the number of parking spaces not to exceed 20-percent (LAMC Section 12.24-S). The 20-percent parking reduction would be calculated prior to the parking reduction for bicycle parking credits.

5. **Site Plan Review Approval:** A Site Plan Review approval is required since the Project proposes an overall increase of more than 50,000 gross square feet on non-residential floor area.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Project Site is in a relatively flat area of the Tarzana area. Other streets are densely populated with commercial and industrial buildings. The existing visual character of the surrounding locale is highly urban, and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that

will affect particular persons.[1] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, no impact would occur.

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

No Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway.

There is no historic structure on the Site. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway.

The Project is not located along or within the scenic vistas or viewsheds of this highway. The Project would not damage and/or remove any scenic resources within a State or City designated scenic highway. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project was to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

The Project Site is located within the Encino - Tarzana Community Plan area, which is characterized by commercial and industrial districts and residential neighborhoods with a mix of older historic structures and newer architecture. Overall, the Project Site is located in an urbanized setting and is surrounded by commercial uses, institutional uses, and surface parking lots.

[1] Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

The building heights and massing from the implementation of the Project would create a change in the visual character of the Project Site from what currently exists. However, it would be similar in height and massing compared to the commercial structures surrounding the Project Site and is consistent with the evolving visual character of the area and the Limited Manufacturing land use designation for the area. The Project will be similar in size and scale to multi-story structures in the vicinity.

The buildings surrounding the Project Site vary in age and architectural style, from more contemporary structures that were constructed from the 1920s through the 1940s. The Project's design is a contemporary style that is more compatible with the more contemporary designs incorporated in buildings constructed in the area over the last 15 years.

During construction, construction walls and barriers would be erected to protect the Site from vandalism and, which have the potential to attract unauthorized bills and postings. The Project will comply with LAMC Section 14.4.17, which regulates temporary signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed building, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding industrial and commercial uses. Vehicle headlights from traffic around the Site contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Site currently contains three low-rise buildings with window illumination.

The Project would construct a 3-story building and interior lighting through windows would increase as compared to the existing setting. Also, the commercial nature of the Project would create additional lighting into the night hours. The Project will provide illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient "glow" presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses.

Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized location that is already illuminated at night, and the Project's lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Site. This would ensure that lighting would be installed to minimize light trespass to off-site uses. Therefore, a less-than-significant impact would occur.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project includes an increase in window and building surfaces in comparison to the existing use. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have facades that are broken up by the various articulation. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. This would ensure that the building will not create substantial glare. Therefore, a less-than-significant impact would occur.

Cumulative Impacts

The geographic context for the analysis of cumulative impacts related to visual character of the surrounding area and its aesthetic image would include related projects located within view of the Project Site. Projects located in such a position that they would not be visible from the Project Site or to which the Project would not be visible would not normally have a potential to combine with the Project to create a cumulative aesthetics impact.

Most related projects would not be visible from the Project Site area, due to distance and intervening structures. No scenic vistas are available from the Project Site area and as such, development of related projects in the vicinity of the Project Site would not result in any cumulative impacts related to scenic vistas. The degree to which each of the related project sites contain scenic resources that could be affected by the related projects would be considered by the City on a case-by-case basis. The Project Site does not contain any scenic resources that are shared by or common to any of the related project sites. Related projects within the Project Site area would be required to undergo review and approval by the Department of City Planning to ensure compliance with applicable design guidelines, which would ensure continuity of these projects with the City's visual character/quality standards.

Further, development of the Project in combination with the related projects could result in an intensification of land uses in an already urbanized area of the City, which currently maintains an elevated level of ambient light and glare, typical of a densely developed city. As such, the Project and related projects could contribute to increased ambient light levels within the surrounding area. However, the Project Site area is highly urbanized, and the presence of additional nighttime illumination resulting from the Proposed and related projects would not represent a significant, adverse alteration to the existing nighttime visual environment. Additionally, the potential increase in nighttime light resulting from the Project would not be bright enough to substantially affect nearby sensitive uses. For these reasons, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned M1-1 and (Q)MR1-1and the General Plan land use designation for the Site is Limited Manufacturing. The Site is developed with one building and associated parking lot. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[2] Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[3] The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact. The Project Site is completely surrounded by urban uses and infrastructure and is not forest land. Therefore, no impact would occur.

2 State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018, Map, website: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed February 23, 2022.

3 State of California Department of Conservation, Williamson Act Program, website: https://www.conservation.ca.gov/dlrp/wa, accessed February 23, 2022.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. Therefore, no impact would occur.

Cumulative Impacts

Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

The analysis in this section is based primarily on the following (refer to **Appendix B**):

- Air Quality and Greenhouse Gas Emissions Technical Data, Noah Tanski Environmental Consulting, September 2021.

ENVIRONMENTAL SETTING

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the California Clean Air Act (CCAA) is administered by the California Air Resources

Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown on **Table III-1**. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and P_b.

State

California Clean Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Table III-1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	8-hour	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment

Source: CARB, Area Designations Maps/State and National. (www.arb.ca.gov/desig/adm/adm.htm). Accessed September 14, 2020.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health.

Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses. The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project is located within the 6,745-square-mile Basin, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- Rule 401 Visible Emissions – This rule prohibits an air discharge that results in a plume that is as dark or darker than what is designated as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance – This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

- Rule 403 Fugitive Dust – This rule requires that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2016 Air Quality Management Plan

The 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

The 2020-2045 RTP/SCS (Connect SoCal), SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network.

At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[4] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

4 SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

Local

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City's General Plan identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals.

The Air Quality Element includes the following six key goals:

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

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

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

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

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

EXISTING CONDITIONS

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria" air pollutants include CO, ground-level O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb. The descriptions below of each criteria air pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[5]

[5] USEPA, Criteria Air Pollutants. (www.epa.gov/criteria-air-pollutants). SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

Carbon Monoxide (CO). CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated CO concentrations reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone (O_3). O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and is therefore emitted by automobile, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2). Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into itself. However, small particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these small particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most

sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

Lead (Pb). Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[6]

One key TAC is diesel particulate matter (diesel PM or DPM), which is emitted in diesel engine exhaust. Released in May 2015 by the SCAQMD, the Multiple Air Toxics Exposure Study in the South Coast Air Basin Final Report (Mates IV) determined that about 90 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM represents the majority of the potential cancer risk from vehicle traffic.[7] Overall, diesel PM was found to account for, on average, about 68 percent of the air toxics risk in the Basin.[8]

In addition to its carcinogenic potential, diesel PM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[9]

Volatile Organic Compounds

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air

6 CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

7 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

8 SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV), May 2015.

9 CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

with other pollutants (e.g., NO_X, CO, SO_2, etc.) and contribute to the formation of photochemical smog.

Project Site Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. **Table III-1**, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project is located in SCAQMD's SRA No. 6, "West San Fernando Valley." **Table III-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in SRA No. 6 from 2017 through 2019. The one-hour State standard for O_3 was exceeded 41 times during this three-year period, and the federal standard was exceeded 119 times. CO, NO_2, and $PM_{2.5}$ levels did not exceed their respective CAAQS or NAAQS during this period. Data for PM_{10}, SO_2, and lead is not available for the most recent years.

Existing Health Risk in the Surrounding Area

Based on the MATES IV model, the calculated cancer risk from air toxics in the Project area is approximately 681 per one million, which is slightly lower than the Basin's average risk of 897 per one million and comparable to other communities in West San Fernando Valley.[10,11] The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to the Draft CalEnviroScreen 4.0, the Project's census tract is ranked 81st percentile. The tract's pollution-

10 SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV), MATES IV Interactive Carcinogenicity Map. https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f. Accessed July 27, 2021.

11 The latest MATES V draft results were inaccessible at the time of this report. It is likely that the air toxics cancer risk in the Project area, as determined by the latest MATES V study, is lower than what was determined by the previous MATES IV study (and referenced in this report). This is because the Basin-wide carcinogenic risk from air toxics as estimated by MATES V is approximately 38% lower than the level estimated by MATES IV.

specific burden, irrespective of other factors, is ranked 90th percentile, indicating that it is among the most pollution-burdened tracts in the State.[12]

Table III-2
Ambient Air Quality Data – SRA No. 6 "West San Fernando Valley"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2017	2018	2019
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.140	0.120	0.101
Days > 0.09 ppm (State 1-hour standard)	26	14	1
Days > 0.070 ppm (Federal 8-hour standard)	64	49	6
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	3.0	3.4	2.6
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	2.5	2.1	2.2
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0625	0.0572	0.0644
Days > 0.18 ppm (State 1-hour standard)	0.0625	0.0572	0.0644
PM_{10}			
Maximum 24-hour Concentration (µg/m^3)	N/A	N/A	N/A
Days > 50 µg/m^3 (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	35.20	31.00	30.00
Days > 35 µg/m^3 (Federal 24-hour standard)	0	0	0
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Lead (Pb)			
Maximum Monthly Average Concentration (µg/m^3)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m^3)	N/A	N/A	N/A

ppm = parts per million of air, by volume
µg/m^3 = micrograms per cubic meter.
N/A = data not available at this monitoring station.
Source: SCAQMD Historical Data by Year (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed September 2020.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or

[12] Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. https://experience.arcgis.com/experience/4af93cf9888a424481d2868391af2d82/page/home/?data_id=dataSource_2-1754d6afdb4-layer-9%3A4973. Accessed July 19, 2021.

sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities.

For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[13] Sensitive receptors in the vicinity of the Project include, but are not limited to, the following:

- Residential Land Uses: Residential uses in the vicinity of the Project are located along Baird Avenue, Yolanda Avenue, Hatteras Street, and other nearby roadways. The closest residential receptor is a multifamily residential complex located directly south of the Project Site at 18601 Hatteras Street ("Tarzana Terrace").

- Tarzana Treatment Center, Inc.: This healthcare facility is located at 18646 Oxnard Street, approximately 20 feet west of the Project Site. It is assumed that this facility may contain live-in treatment patients and associated staff.

Other nearby receptors where workers or other users may be present for one to eight or more hours include a multitude of commercial and other land uses surrounding the Project Site. However, no other receptors, "sensitive" or otherwise, are located nearer to the Project than those that are identified above. Receptors that are located at greater distances from the Project would experience lesser impacts.

Existing Project Site Emissions

The Project Site contains an existing 47,124 square-foot building that houses a film and graphic design college. The rest of the Project Site consists mostly of surface parking associated with this land use. As discussed previously, the existing building would be adaptively re-used as part of the Project. A majority of the surface parking area would be demolished in order to make way for a new 51,540 square foot building. **Table III-3** provides an estimate of daily pollutant emissions

13 SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.

associated with the Project's Site's existing uses and features, inclusive of related vehicle trips and mobile source emissions.

Table III-3
Current Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.1	<0.1	<0.1	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.3	0.3	<0.1	<0.1	<0.1
Mobile Sources	1.9	2.2	19.3	<0.1	3.8	1.0
Net Regional Total	**3.0**	**2.6**	**19.5**	**<0.1**	**3.8**	**1.1**
Source: NTEC 2021, based on CalEEMod 2020.4.0 model runs.						

PROJECT IMPACTS

Methodology

The analysis below focuses on the potential change in air quality conditions that could result from the Project's construction- and operations-related air pollutant emissions. Specific methodologies used to evaluate these emissions are discussed below.

Construction

Construction of the Project could affect local and regional air quality due to the use of gasoline and diesel-powered construction equipment, as well as the generation of construction vehicle trips. Demolition, grading, and any site preparation activities would also result in fugitive dust emissions. It is important to consider that construction emissions can vary substantially from day to day depending on levels of construction activity, the specific types of construction activities taking place, and the types of vehicles/equipment in use. For dust, the prevailing weather conditions can influence emissions.

Based on the criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if its regional emissions from both direct and indirect construction sources would exceed the threshold levels shown in **Table III-4**.

SCAQMD localized significance thresholds (LSTs) are also included below in **Table III-4**. LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. They are developed based on the ambient concentrations of a given pollutant for a source receptor and distances to the nearest sensitive receptor.

The SCAQMD provides LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD does not provide an LST for SO_2 because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant.

Additionally, because VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. However, due to the role that VOCs play in O_3 formation and their classification as a precursor pollutant, a regional emissions threshold has been established. LSTs for the Project were obtained via the SCAQMD's mass rate look-up tables, which are used to determine whether or not a project may generate significant adverse localized air quality impacts.

The Project's construction-related emissions were estimated using SCAQMD's CalEEMod 2020.4.0 model. Modeling results are included in **Appendix B** to this MND. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 for fugitive dust, as is mandatory for all construction projects in the Basin.

Table III-4
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized[A]
Volatile Organic Compounds – VOCs	75	-
Nitrogen Oxides - NO_X	100	103
Carbon Monoxide – CO	550	426
Sulfur Oxides - SO_X	150	-
Respirable Particulates – PM_{10}	150	4
Fine Particulates – $PM_{2.5}$	55	3

[A] Localized significance thresholds assumed the following:

- 1-acre maximum daily disturbed acreage, consistent with the Project's maximum grading activities, which would be less than 1 acre per day. This is the smallest project size used for analysis in the LST guidance document and is consistent with the SCAQMD's "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" document.
- 25-meter (82-foot) receptor distance, which is the shortest distance used for analysis in the LST guidance document.
- The Project is located in SRA No. 6, "West San Fernando Valley."

Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

Operations

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Regional thresholds and LSTs for Project operations are shown below in **Table III-5**. Operational emissions for the Project were also calculated using CalEEMod 2020.4.0.

Table III-5
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Operational Emissions (lbs per day)	
	Regional	Localized[A]
Volatile Organic Compounds - VOCs	55	-
Nitrogen Oxides - NO_X	55	103
Carbon Monoxide – CO	550	426
Sulfur Oxides - SO_X	150	-
Respirable Particulates – PM_{10}	150	1
Fine Particulates – $PM_{2.5}$	55	1

[A] Localized significance thresholds assumed the following:

- 1-acre project size, which is smaller than the Project's 1.5-acre size and the shortest project size used for analysis in the LST guidance document.
- 25-meter (82-foot) receptor distance, which is the shortest distance used for analysis in the LST guidance document.
- The Project is located in SRA No. 6, "West San Fernando Valley."

Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

Toxic Air Contaminants Impacts (Construction and Operations)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

Thresholds of Significance

SCAQMD Thresholds

Construction

The criteria below are set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project construction impacts. Under these following thresholds, a significant impact would occur when:[14]

- Regional emissions from both direct and indirect sources exceed the thresholds shown on **Table III-4**.
- Maximum on-site daily localized emissions exceed the LSTs also shown on **Table III-4.**

[14] SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015.

Operation

The SCAQMD thresholds listed below serve as quantitative air quality standards to be used to evaluate project impacts. Under these following thresholds, a significant impact would occur when:

- Operational emissions from both on- and off-site sources exceed the regional thresholds shown on **Table III-5**.
- Maximum on-site daily localized emissions exceed the LSTs also shown on **Table III-5**.
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

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

No Impact. As discussed below, the Project would be consistent with SCAQMD's 2016 AQMP.

SCAQMD CEQA Air Quality Handbook Policy Analysis and SCAG 2016-2040 RTP/SCS Consistency

The following analysis assesses the Project's consistency with the SCAQMD's 2016 AQMP and SCAG's latest 2020-2045 RTP/SCS. As discussed earlier, the 2016 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the previous 2016-2040 RTP/SCS, which are themselves largely based on growth forecasts from local governments like the City of Los Angeles; therefore a project is consistent with the 2016 AQMP, in part, if it is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2016-2040 RTP/SCS (or the latest 2020-2045 RTP/SCS, for that matter). The Project site is partially zoned "MR1-1" and "M1-1," which permits the site's proposed land use. As such, the RTP/SCS's assumptions about population and employment growth in the City accommodate and account for the Project's land use on this site. However, it is important to note that the Project proposes a land use that is not associated with dense employment, and it is unlikely that the Project's employment would exceed that of the site's previous use. As a result, the Project would not contribute to substantial job growth, and it would not exceed job growth assumptions utilized by the RTP/SCS.

The Project's proposed self-storage facility use also would not generate a substantial number of vehicle trips – no more than 18 new trips per hour. Overall, the Project would result in a substantial net reduction of vehicle trips as compared to the site's previous use. Though the RTP/SCS generally aims to reduce vehicle trips and vehicle miles traveled (VMT) by locating dense housing, employment, and commercial growth within HQTAs to facilitate the use of alternative transportation modes, the Project does not propose such dense housing, employment, or commercial uses. As such, this smart growth policy is not applicable to the Project, especially considering that the presence of such alternative transportation modes would be unlikely to offset

a substantial number of vehicle trips in the case of the Project. The proposed self-storage use generates relatively few trips to begin with, and the nature of the use is somewhat reliant on vehicle transportation. Nevertheless, the Project is located in a HQTA and across the street from the Reseda Orange Line Station, which would provide the opportunity for Project employees and other users to utilize the high quality bus transit options that service the area. Given these considerations, the Project is appropriately located and does not conflict with the intent of the RTP/SCS or smart growth policies to efficiently coordinate land usage and transportation.

City of Los Angeles Policies

The City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below on **Table III-6**, the Project would be consistent with the applicable policies of the Air Quality Element.

Table III-6
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	**Consistent –** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent –** The Project would not include the development of any unpaved roads or parking lots.
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 VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent –** Future employers could implement these transportation demand management strategies that help reduce traffic congestion, VMT, and subsequently air pollution. The Project's proximity to high quality transit options would encourage the reduction of vehicle trips and VMT. Also, the Project proposes 60 bicycle parking spaces.
Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors in order to reduce work trips.	**Consistent** – Future employers could implement these telecommunications strategies that help reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Consistent –** Future property managers could implement these strategies that help reduce traffic congestion, VMT, and subsequently air pollution. The Project would provide unbundled parking to incentivize alternative modes of transportation by future employees and visitors.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent –** Future property managers could implement parking management programs that reduce employee vehicle travel.

Table III-6
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	**Not Applicable –** The Project would not include any facilities for the types of special events referenced by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	**Consistent –** The Project would result in a substantial decrease in site-related vehicle trips and therefore would not contribute to traffic congestion.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent –** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	**Consistent –** The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent –** The Project would include 60 bicycle parking spaces. Additionally: • The Project would conform to all design element requirements of the City's Complete Streets Design Guide so that Project features do not hinder sight distance, mobility, or accessibility. • Nearby Reseda Boulevard is designated a "Moderate Plus Transit Enhanced Street" by the City's Mobility Plan 2035. • Reseda Boulevard is also striped to include Class II bicycle lanes, and the Orange Line Busway Bike Path can be accessed across the street from the Project. • The neighborhood surrounding the intersection of Reseda Boulevard and Oxnard Street is designated a "Pedestrian Enhanced District" by the City's Mobility Plan 2035. • As noted earlier, the Project is located in a HQTA directly across the street from the Reseda Orange Line Station. The Project would include three EV charging stalls.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent –** The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent –** For the reasons discussed above and elsewhere in this report, the Project would be consistent with this policy.

Table III-6
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent –** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Source: NTEC, 2021.	

Summary

To summarize the analysis in response to Threshold (a): (1) Project-related growth would be consistent with 2016 AQMP projections that are themselves based on 2016-2040 RTP/SCS projections; (2) the Project would not generate a substantial number of vehicle trips, therefore current smart growth policies to locate dense housing, employment, or commercial uses in HQTAs or other areas with the potential to reduce VMT and associated air emissions would not apply, despite the fact that the Project is located within a HQTA; (3) to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions.

As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans. Therefore, no impact would occur.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as discussed in the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction

Construction of the Project is anticipated to last approximately 15 months. During this time, a variety of diesel-powered vehicles and equipment would be operated on-site. Demolition and grading for the Project would require vehicles such as an excavator, a bulldozer, and other heavy equipment. The building construction phase would require equipment such as forklifts and welding tools. **Table III-7**, below, summarizes the estimated construction schedule that was used to model the Project's air quality impacts.

Table III-7
Potential Construction Schedule

Phase	Duration
Demolition	1.5 months
Grading	1 month
Building Construction	11 months
Architectural Coatings	3 weeks
Paving	2 weeks
Construction schedule, including start, end and duration dates, are estimates only. Source: CAJA, 2021.	

The Project's unmitigated maximum daily regional and local emissions from construction, as estimated using SCAQMD's CalEEMod 2020.4.0 model, are shown in **Table III-8**, below. Regional thresholds and LSTs for each air pollutant are also shown for comparison. As shown, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions also would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

Table III-8
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
2023	1.0	13.2	9.0	<0.1	3.3	1.9
2024	64.9	7.2	9.3	<0.1	0.5	0.3
Maximum Regional Emissions	64.9	13.2	9.3	<0.1	3.3	1.9
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
2023	1.0	10.0	8.3	<0.1	3.2	1.9
2024	64.9	6.3	8.8	<0.1	0.3	0.3
Maximum Localized Emissions	64.9	10.0	8.8	<0.1	3.2	1.9
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**
Source: NTEC, 2021.						

Operation

Emissions associated with the Project's operations were also calculated using CalEEMod 2020.4.0. As shown below in **Table III-9**, development of the Project would not introduce any new major sources of air pollution; maximum daily emissions would not exceed SCAQMD's regional

significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's operations-related emissions impacts on regional and localized air quality would be less than significant.

Table III-9
Maximum Regional and Localized Operational Emissions (Unmitigated)

Emissions Source	Emissions in lbs per day					
	VOC	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	2.3	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	0.8	0.9	8.8	<0.1	2.1	0.6
Project Regional Emissions [A]	3.1	0.9	8.8	<0.1	2.2	0.6
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	2.3	<0.1	<0.1	<0.1	<0.1	<0.1
Localized Significance Thresholds	-	103	426	-	1	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[A] Some figures may not add up properly due to rounding.
Source: NTEC, 2021.

Overall, the Project's construction and operations emissions would not exceed applicable regional thresholds and LSTs. As discussed, SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither the Project's construction nor operations emissions would be expected to cause or measurably contribute to adverse health impacts, and the Project's construction and operations emissions impacts on regional and localized air quality would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed below, Project impacts related to sensitive receptors would be less than significant.

Construction

As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located 25 meters or further from the Project would not be exposed to substantial pollutant concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 15 months, and daily diesel PM emissions would vary considerably day by day, and by phase. After the initial demolition and grading activities, which would be minimal (approximately 2.5 months), daily diesel PM emissions would reduce considerably. Additionally, as shown earlier, the Project's PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. As a result, TAC emissions from the Project's construction equipment are expected to result in less than significant health risk impacts.

Operation

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

Additionally, the Project does not propose typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As a result, the Project's operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. As shown earlier in **Table III-2**, CO levels in the Project area are well-below federal and state standards, as are CO levels in the Basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. As discussed earlier, the Project would result in a substantial reduction of site-related traffic generation. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project will introduce a storage

use to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. Therefore, no impact would occur.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above (i.e., the applicable regional and localized significance thresholds) also be considered cumulatively considerable.[15] Conversely, individual projects that do not generate emissions in excess of SCAQMD's significance thresholds would not be considered to contribute substantially to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

15 SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The section is partially based in part on the following item, included as **Appendix C** of this MND:

- Tree Inventory Report, KSP Studio, February 21, 2022.

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

Less Than Significant Impact. The Project Site is located in an urbanized and developed area of the City and is developed with institutional buildings and surface parking. However, there are 97 trees located on the Project Site. These trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that that Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, Project impacts related to nesting birds would be less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City and is occupied by an institutional building and surface parking. No riparian or other sensitive natural communities are located on or adjacent to the Project Site. Thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities. Therefore, no impacts related to this issue would occur as a result of the Project.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area of the City and is occupied by an institutional building and surface parking. No wetlands are located on or adjacent to the Project Site. Thus, implementation of the Project would not result in any adverse effect on wetlands. Therefore, no impacts related to this issue would occur as a result of the Project.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Project Site is located in an urbanized area of the City and is occupied by an institutional building and a surface parking. The Site is part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Site that are used by

migratory fish, and there are no wildlife nursery sites in the area. Also, as discussed previously, the Project would be required to comply with the MBTA, to reduce potential impacts to migratory bird species that could potentially nest in trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, no impact would occur.

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

No Impact. In accordance with the LAMC Section 17.02 protected trees are defined as follows:

Any of the following Southern California native tree or shrub species:

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

There are 97 trees on the Project Site and one right-of-way tree (refer to **Appendix C** of this MND):

- 2 Smoke Tree (to be removed)
- 4 Italian Cypress (to be removed)
- 13 Lemon-Scented Gum (to be removed)
- 12 Red Ironbark (to be removed)
- 49 Brush Cherry (to be removed)
- 5 Crape Myrtle (to be removed)
- 7 Canary Island pine (to be removed)
- 5 African Sumac (to be removed)

- 1 ROW (street tree) Crape Myrtle (to be preserved)

Of these trees, none are protected species as defined by the City's Projected Tree Ordinance No. 177,404. For removal of the non-protected trees, the Project Applicant would be required to comply with the existing tree replacement requirements of the City's Division of Urban Forestry. Therefore, no impact would occur.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located in an urbanized area of the City. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Site, and the site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[16] There are no adopted conservation plans in the City. Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

As discussed, 97 trees are located on the Project Site; no other significant biological resources are located on the Project Site. However, the Project Applicant would be required to plant replacement trees at and adjacent to the Project Site in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. All of the related projects would be located in highly urban areas and likely do not contain significant biological resources, such as special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

[16] City of Los Angeles General Plan Conservation Element, Exhibit B2.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The section is partially based in part on the following item, included as **Appendix D** of this MND:

- Archaeology Response Letter, South Central Coastal Information Center, February 16, 2022.

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

No Significant. A significant impact would occur if the proposed project would substantially alter the environmental context of or remove identified historical resources. State CEQA Guidelines Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

The Project Site is developed with an institutional use with associated parking area. The building is not old enough to be considered a historic resource nor is the structure being demolished as part of the Project. According to ZIMAS, the Project Site does not require historic preservation review.[17]

17 HistoricPlacesLA: http://www.historicplacesla.org/map, accessed July 2021.

The Project would not introduce incompatible visual elements and would not affect views of any of the historic resources. The Project would not cause any substantial change in the immediate surroundings such that the significance of the historical resources would be materially impaired. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Sate CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. There is a possibility of encountering a resource.

According to the South Central Coastal Information Center, there are no archaeological resources recorded in the Project area.

If archaeological resources are discovered during excavation, grading, or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is developed with commercial buildings and surface parking. Although the Project Site has been subject to grading and development in the past and no human remains are known to exist at the site, the Project would require excavations at a depth of approximately 30 feet below ground surface, and it is possible that unknown human remains could exist at the site. In accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law

concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code (PRC). The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Through compliance with the regulatory standards described above, the Project would not disturb any human remains, including those interred outside of dedicated cemeteries. Therefore, Project impacts to human remains would be less than significant.

Cumulative Impacts

It is possible that some of the related projects could result in significant impacts on historical resources. However, as discussed above, the Project would not result in direct or indirect impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and any related project) that involves ground-disturbing activities is required to implement the City's Standard Condition of Approval related to Inadvertent Discovery of Archaeological Resources, and existing state and City regulations related to human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

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

Less Than Significant. This analysis addresses the criteria outlined in Appendix F of the CEQA Guidelines.

Criterion 1: *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

Construction

Project construction is expected to be completed in 2024. The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity. Also, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure would be consumed during Project construction activities. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site overhead and underground along Oxnard Street.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Demolition activities are projected to take approximately three months. Heavy-duty construction equipment needed to complete these activities would include diesel-fueled haul trucks, concrete/industrial saw, generator sets, and a rubber tired dozer. The use of haul trucks with

double trailers could be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris.

Heavy-duty construction equipment needed during construction of the Project would include a cranes, aerial lift, cement and mortar mixer, concrete/industrial saw, generator sets, other material handling equipment, pump, forklift, tractor/loader/backhoe, and welders the majority of which would be diesel fueled. Construction equipment fuels would be provided by local or regional suppliers and vendors.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2019 was 23.68 miles per gallon (mpg) for gasoline and 9.43 mpg for diesel.[18] In 2018, California consumed a total of 3.4 billion barrels of gasoline for transportation, which is equivalent to a total annual consumption of 143 billion gallons by the transportation sector.[19]

Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[20]

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available

18 CARB, https://arb.ca.gov/emfac/emissions-inventory.

19 EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, August 2021. One barrel of oil has 42 gallons of oil.

20 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

Electricity Demand

Currently, LADWP is able to supply over 7,880 megawatts (MW) of generation capacity with the highest recorded peak being 6,502 MW.[21] Peak demand is expected to grow to 5,976 MW in 2023-2024 (approximate Project buildout timeframe).[22] Despite these growth projections, demand would still not exceed the existing capacity of 7,880 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that a net decrease of approximately 65,301 kWh/year of electricity would be used per year at the Project Site (refer to **Table VI-1**). The decrease is due to the greatly reduced electricity usage rates assumed for storage/warehouse uses as compared to college uses.[23]

Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines adjacent to the site.

Table VI-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
Existing Uses (to be removed)		
Trade School	47,124 sf	456,632
Parking Lot	41,920 sf	14,672
	Existing Total	**471,304**
Proposed Uses		
Storage	97,846 sf	396,780
Parking Lot	26,350 sf	9,223
	Proposed Total	**406,003**
	Less Existing	**-471,304**
	Net Total	**-65,301**

21 LADWP, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afrLoop=86275907941327.

22 2017 Power Strategic Long-Term Resource Plan, LADWP, December 2017.

23 CalEEMod, User Guide, Appendix D Default Data Tables, Table 8.1 (Energy Use by Climate Zone and Land Use Type).

Table VI-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year		
[1] Calculated via CalEEMod. Refer to Appendix B to this MND.		
Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.		

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP and what exists currently at the Project Site for the existing uses. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also be in compliance with the City's Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[24] For the reasons discussed here, the Project's operational impacts related to electricity would be less than significant.

Natural Gas Demand

As shown on **Table VI-2**, the Project would consume a net decrease of approximately 1,174,776 kBTU per year or 1,151,280 cubic feet of natural gas per year.[25] The decrease is due to the greatly reduced natural gas usage rates assumed for storage/warehouse uses as compared to college uses.[26]

Table VI-2
Estimated Project Natural Gas Demand

Land Use	Size	Total (kBTU/yr)[1]
Existing Uses (to be removed)		
Trade School	47,124 sf	1,263,870
Parking Lot	41,920 sf	0
	Existing Total	**1,263,870**
Proposed Uses		
Storage	97,846 sf	89,094
Parking Lot	26,350 sf	0
	Proposed Total	**89,094**
	Less Existing	**-1,263,870**
	Net Total	**-1,174,776**

24 LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.

25 One kBTU = 0.98 cubic foot.

26 CalEEMod, User Guide, Appendix D Default Data Tables, Table 8.1 (Energy Use by Climate Zone and Land Use Type).

Table VI-2
Estimated Project Natural Gas Demand

Land Use	Size	Total (kBTU/yr)[1]
du = dwelling unit sf =square feet kBTU = 1,000 British Thermal Units yr = year		
[1] Calculated via CalEEMod. Refer to Appendix B.		
Note: SCG does not provide or comment on generation rates to provide an estimate of demand.		

Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas). Natural gas distribution lines in the vicinity of the Project Site include an a 4-inch line and a 6-inch line along Oxnard Street.[27]

Natural gas service is provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The availability of natural gas is based on current conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

Gas supply available to SoCalGas from California sources averaged 323 million cubic feet per day (cf/day) in 2017.[28] SoCalGas projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas's projection for natural gas also decreases. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cubic feet/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas's estimated physical capacity of upstream pipelines. SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet, of that, 112.5 billion cubic feet is allocated to residential, small industrial, and commercial customers.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts.

Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas

27 Navigate LA, https://navigatela.lacity.org/navigatela/, accessed September 2021.

28 2018 California Gas Report, California Gas and Electric Utilities, 2018.

would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Code, which requires building energy efficiency measures. Therefore, the Project's operational impacts related to natural gas supply would be less than significant.

Transportation Energy Demand

The Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site, including Metro Orange Line Main Reseda Station and Metro Orange G-Line 240. As such, the Project Site would provide access for employees and patrons of the Project Site. These transit services, in addition to long-term bicycle parking spaces and short-term bicycle parking spaces, would provide alternatives to driving individual vehicles both to the Project Site from the surrounding areas as well as for employees and patrons at the Project Site to travel to surrounding areas. The change in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand.

The National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations, such as Corporate Average Fuel Economy (CAFE) Standards and the Advanced Clean Cars Program, to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption.

Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Criterion 2: *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

Electricity

The availability of electricity is dependent on adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Project would be part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) incorporates the estimated power

requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2023-2024 fiscal year (the Project's buildout year) would be 23,286 gigawatt-hours (GWh) of electricity.[29] As discussed previously, the Project would consume approximately 1,483,624 kWh of electricity annually, representing a small fraction of one percent of LADWP's projected sales for the 2023-2024 fiscal year. As future projected electricity supplies from LADWP are adequate to serve the Project, Project impacts on local and regional electricity supplies would be less than significant.

Natural Gas

As stated above, SoCalGas has a combined theoretical storage working inventory capacity of 112.5 billion cf allocated to residential, small industrial, and commercial customers.[30] Since the Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Project. However, the Project would require Project-specific infrastructure improvements to connect to the existing infrastructure serving the Project Site area.

As discussed previously, the Project's net natural gas demands are estimated to be approximately 11,289,147 cubic feet per year and would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity. Thus, the Project's estimated natural gas consumption would be within the SoCalGas's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Therefore, Project's impacts on local and regional natural gas supplies would be less than significant.

Criterion 3: *The effects of the project on peak and base period demands for electricity and other forms of energy.*

As discussed above, the Project's demand for electricity and natural gas supply would be well within the available regional supplies of LADWP and SoCalGas, respectively. The Project's energy demand and consumption would be relatively negligible compared to available supplies. The electricity and natural gas supplies would be sufficient to serve the Project's peak energy consumptions, and impacts would be less than significant.

Criterion 4: *The degree to which the project complies with existing energy standards.*

The Project would be required to comply with Title 24 requirements, CalGreen requirements, and the City's Green Building Code. Thus, the Project would comply with energy standards, and impacts would be less than significant.

29 2017 Power Strategic Long-Term Resources Plan, LADWP, December 2017.

30 2018 California Gas Report, California Gas and Electric Utilities, 2018.

Criterion 5: *The effects of the project on energy resources.*

Electricity

LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2023-2024 fiscal year (the Project's buildout year) would be 23,286 GWh of electricity. As such, the Project's estimated net annual usage demand of 1,483,624 kWh would be a small fraction of one percent of LADWP's projected sales for the 2023-2024 fiscal year.

In accordance with Senate Bill 350 (SB 350) (Clean Energy and Pollution Reduction Act), which establishes clean energy, clean air, and GHG emissions reduction goals, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. According to the 2017 SLTRP, LADWP has increased renewable energy percentage from 3 percent to 29 percent from 2003 to 2016. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead. The Project would adhere to the required building code standards, such as Title 24 standards and the City's Green Building Code, to ensure energy efficiency within the Project building. Compliance with energy standards is expected to result in more efficient use of electricity in future years. As such, the Project would not impact electricity resources, and impacts would be less than significant.

Natural Gas

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. As stated in the 2018 California Gas Report, SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf; of that, 112.5 billion cf is allocated to residential, small industrial, and commercial customers. The Project's demand for natural gas supply is estimated to be approximately 1,289,147 cubic feet per year, which would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and thus, would be well within the SoCalGas's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Compliance with energy standards are expected to result in more efficient use of natural gas in future years. Therefore, the Project would not impact natural gas resources, and impacts would be less than significant.

Criterion 6: *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

Approximately 616,121 thousand barrels of crude oil (approximately 25.9 billion gallons) were supplied to California refineries in 2019.[31] Assuming the same supply of crude oil is provided to

[31] California Energy Commission, Oil Supply Sources to California Refineries, https://ww2.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html, accessed April 27, 2020.

California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves.

Additionally, the Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site, including Metro Orange Line Main Reseda Station and Metro Orange G-Line 240.

As such, the Project Site would provide access for employees and patrons of the Project Site. These transit services, in addition to long-term bicycle parking spaces and short-term bicycle parking spaces, would provide alternatives to driving individual vehicles both to the Project Site from the surrounding areas as well as for employees and patrons at the Project Site to travel to surrounding areas. The changes in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies, and impacts on energy resources would be less than significant.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Additionally, the Project would not conflict with or obstruct a state or local plan for renewable energy efficiency. Therefore, impacts related to energy would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen building code, and the City's Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As discussed in more detail in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency) and Checklist Question XI(b) (Land Use and Planning – Plan/Policy/Regulation Consistency), the Project would also be consistent with the LA Green Plan/Climate LA and SCAG's 2020-2045 RTP/SCS.

In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation,

thereby meeting the goals of the LA Green Plan/ClimateLA. With respect to the Sustainable City pLAn, in more detail in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency), although the pLAn is not directly applicable to private development projects, the Project would generally be consistent with the City's targets related to decrease of VMT per capita by 5 percent by 2025 and to increase trips made by walking, biking, or transit by at least 35 percent by 2025. The Project would generally comply with these targets as the Project is an infill development consisting of n storage facility on the Project Site, which is located near regional and local transit services. The Project would be well-served by transit. Furthermore, the Project would comply with the LA Green Building Code, which requires a 20 percent reduction in water use and a requirement to exceed Title 24 energy efficiency standards.

For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur.

Cumulative Impacts

Electricity

The Project, in conjunction with the related projects, could result in a net increased demand for electricity supplies. LADWP's 2017 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands, Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives.

LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands.

Additionally, as discussed above, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

The Project, in conjunction with the related projects, could result in a net increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, all of the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

In 2015, the California Supreme Court in the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [Case No. S213478]) (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users in the Encino-Tarzana Community Plan Area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The section is based in part on the following items, included as **Appendix E** of this MND:

- Geotechnical Site Evaluation, Gorian & Associates, June 10, 2021.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered “inactive” or “potentially active.” Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered “active faults.” Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

The Site is not located within an Alquist-Priolo Earthquake Fault Zone.[32]

32 ZIMAS search: http://zimas.lacity.org/.

The Site is not located within a City of Los Angeles Preliminary Fault Study Area.

There are no known active faults crossing or projecting through the Site. Therefore, ground rupture due to faulting is considered unlikely at this Site.[33]

Therefore, no impact would occur.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

The Site is not within an earthquake fault zone or seismic hazards zone.[34]

The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an

33 Geotechnical Site Investigation, Gorian & Associates, June 10, 2021.

34 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Site is not within a liquefaction zone.[35]

According to the Geotechnical Site Investigation, historic groundwater for the area is roughly 15-feet. The potential for liquefaction was evaluated in the Geotechnical Site Investigation. Based on the results of the analysis, the potential for seismic settlement based on the borings resulted in negligible to minor seismic settlement. Thus, the estimated settlement is relatively uniform across the Project Site, differential settlement is anticipated to be minor to negligible (1/2 inch or less in 30 feet).[36]

Also, the Project will comply with design criteria provided in the Geotechnical Site Investigation including the Uniform Building Code Section 1804.5 (Liquefaction Potential and Soil Strength Loss). Therefore, impacts would be less than significant.

iv. Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The Site is not within a landslide zone.[37]

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[38]

The General Plan Safety Element does not identify any area around the Project Site as a bedrock or probable bedrock landslide area.[39]

Therefore, no impacts would occur.

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

Less Than Significant Impact. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. During the Project's construction phase, activities such as excavation to depths of up to approximately 30 feet below ground surface (bgs),

35 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

36 Geotechnical Site Investigation, Gorian & Associates, June 10, 2021.

37 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

38 ZIMAS search: http://zimas.lacity.org/.

39 Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, March 24, 2020.

grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities.

The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.).

The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed previously, liquefaction potential at the Project Site is considered low. Seismically-induced settlement or compaction of dry or moist, cohesionless soils can also be a secondary effect of earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Some seismically-induced settlement of the proposed structures should be expected as a result of strong ground shaking. However, due to the relatively dense and uniform nature of the soils at the Project Site, excessive differential settlements are not anticipated. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Site

vicinity. Thus, the potential for subsidence due to withdrawal of fluids or gases to adversely impact the site is considered low.[40]

The Project Applicant would be required by the LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the LABC and recommendations included in the Final Geotechnical Reports, impacts related to geologic and soil instability would be less than significant.

d. Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Based on the Geotechnical Engineering Investigation prepared for the Project Site (refer to Appendix E), soils at the Project Site are considered to be low in expansion potential. Therefore, no impacts related to this issue would occur as a result of the Project.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site and surrounding area are flat and are currently developed. No unique geologic features are located on or near the Project Site.

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological

40 Ibid.

remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

Although the Project Site have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 15 feet below ground surface. As such, there is a possibility for unknown paleontological resources to be encountered within the underlying alluvium during grading and excavation activities associated with development of the Project. Nonetheless, the Project Applicant would be required to implement the City's Standard Condition of Approval related to Inadvertent Discovery of Paleontological Resources, as follows:

- Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Site. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

Through compliance with the City's Standard Condition of Approval, Project impacts related to paleontological resources would be less than significant.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, Project cumulative geotechnical impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The analysis in this section is based primarily on the following (refer to Appendix B):

- Air Quality and Greenhouse Gas Emissions Technical Data, Noah Tanski Environmental Consulting, September 2021.

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

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

Less Than Significant Impact. The analysis for Checklist Questions VIII(a) and (b) are considered together. As discussed below, impacts related to GHG emissions would be less than significant.

ENVIRONMENTAL SETTING

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit.

However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.[41]

GHG Emissions Background

GHG emissions include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[42] Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHG emissions are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

REGULATORY FRAMEWORK

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. The following plans, policies, and regulations are fundamental to the Project's determination of significance with respect to its GHG emissions and consistency with these documents.

State

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce to 2000 emission levels[43]
- By 2020, reduce to 1990 emission levels

CARB was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further requires CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by

41 Intergovernmental Panel on Climate Change, 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)].

42 As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

43 The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A.," Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?," July 3, 2013.

Governor Schwarzenegger and Executive Order B-30-15 issued by Governor Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Climate Change Scoping Plan

In 2008, CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e. emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

However, shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED to the Climate Change Scoping Plan (Supplemental FED), approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e. as influenced by the economic downturn) and GHG emissions reduction measures already in place.[44] Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent from BAU conditions, down from the previous 28.5 percent figure.

CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) in 2014. The First Update found that California is on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target if it realizes the expected benefits of its existing policy goals.[45] CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands.

In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update and identifies new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG emissions reduction targets in a way that promotes and rewards innovation,

44 E.g. the million-solar-roofs program, AB 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016. Pavley I could potentially result in a 27.7 million metric tons CO_2e reduction of GHG emissions by 2020. Pavley II covers model years 2017 to 2025 and could result in additional reductions of 4.1 million metric tons CO_2e.

45 The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.

continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources, such as use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.

Senate Bill 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

However, the Guidelines Amendments provide not thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a Project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[46]

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."[47]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any Environmental Impact Report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA.

46 14 Cal. Code Regs. § 15064.4(b).

47 Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008, Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger Vehicle Miles Traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS (Connect SoCal), serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[48]

HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful

48 SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

Local

City of Los Angeles Green LA Action Plan/Sustainability pLAn

The City of Los Angeles (City) began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHG emissions from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Code, as discussed below. In 2008, the City released an implementation program for the LA Green Plan referred to as ClimateLA, which provides detailed information about each action item discussed in the LA Green Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models, and reducing water consumptions.

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic area, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include the construction of new housing units within 1,500 feet of transit, reducing VMT per capita by five percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAn is to be updated every four years.

In 2019, the first four-year update to the 2015 Sustainability pLAn was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals. L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. The City's commitments related to renewable energy usage, water conservation, waste reduction, and other initiatives would all benefit the Project.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. However, Senate Bill 1953 preempts local jurisdictions from the enforcement of all building standards published in the Title 24, California Building Standards Code relating to the regulation of hospital buildings.

EXISTING CONDITIONS

Existing Statewide GHG Emissions

As reported by the California Energy Commission (CEC), California contributes approximately one percent of global and 6.4 percent of national GHG emissions.[49] California contains approximately 12 percent of the national population. CARB reports that in 2019, emissions from GHG emissions statewide were 418 million MT of CO_2e, 7 million MT of CO_2e lower than 2018 levels and nearly 13 million MT of CO_2e below the State's 2020 GHG limit of 431 million MT of CO_2e. 48 percent of the State's total electricity generation (in-state generation plus imported electricity) came from zero-GHG generation sources (e.g. solar, wind, hydropower, nuclear, etc.). Per capita GHG emissions have dropped from a 2001 peak of 14.0 MT per person to 10.5 MT per person in 2019, a 25 percent decrease. The transportation sector remains the largest source of GHG emissions, accounting for almost 40 percent of the State's GHG inventory (though when emissions from extracting, refining, and moving transportation fuels are included, this figure increases to over 50 percent of statewide emissions for 2019.[50]

Existing Project Site Emissions

The Project is currently improved with an existing 47,124 square-foot building that houses a film and graphic design college. The rest of the Project Site consists mostly of surface parking associated with this land use. As noted earlier, the existing building would be adaptively re-used as part of the Project, and a majority of the site's surface parking area would be demolished in order to make way for a new 51,540 square foot building. Emissions associated with the Project Site's existing land usage were estimated for informational purposes, and it was determined that the site's existing operations may generate about 830 MT of CO_2e annually.

IMPACT ANALYSIS

Methodology

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance thresholds; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

However, Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public

49 California Energy Commission. Tracking Progress, Greenhouse Gas Emission Reductions. www.energy.ca.gov/renewables/tracking_progress/documents/Greenhouse_Gas_Emissions_Reductions.pdf. Last updated December 2018.

50 CARB, California Greenhouse Gas Emissions for 2000 to 2017. 2019.

agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory schemes to reduce GHG emissions.

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 2008 Scoping Plan and its subsequent updates, as well as the City's Sustainable pLAn/Green New Deal.

Construction

The Project's construction emissions were calculated using CalEEMod Version 2020.4.0. Details of the modeling assumptions and emission factors are provided in **Appendix B** of the IS/MND. GHG emissions from construction activities were modeled using a reasonable estimate of the Project's construction schedule and phasing. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the

overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[51] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operation

Similar to construction, the SCAQMD-recommended CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project site. The Project would result in direct and indirect GHG emissions generated by related vehicle trips and operations associated with the proposed building.

Thresholds of Significance

The following thresholds are adopted to aid in the determination of the Project's impacts:

State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to air quality if the Project would:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment;

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

For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change, no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emission is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. As discussed earlier, for this Project, the most directly applicable adopted plans and policies to reduce GHG emissions are the AB 32 Scoping Plan and subsequent updates, SCAG's 2020-2045 RTP/SCS, and the City's Sustainability pLAn/Green New Deal. Thus, the Project would not have a significant effect on the environment if it were found to be consistent with these applicable plans and policies to reduce GHG emissions.

51 SCAQMD Governing Board Agenda Item 31, December 5, 2008.

Analysis of Project Impacts

Consistency with Applicable Plans and Policies

As described above, compliance with applicable GHG emissions reduction plans would result in a less than significant Project-level and cumulative impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations outlined in the Scoping Plan and its subsequent updates, the 2020-2045 RTP/SCS, and the Sustainable pLAn/Green New Deal. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

Statewide: Climate Change Scoping Plan

The Climate Change Scoping Plan sets forth a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions. **Table VIII-1** contains an evaluation of applicable reduction actions/strategies by emissions source category outlined in the Climate Change Scoping Plan that through implementation would serve to indirectly reduce Project GHG emissions. Further evaluation of project design features and specific applicable policies and measures in the Climate Change Scoping Plan is provided in **Table VIII-2**. As shown therein, the Project would not conflict with the policies included in the Climate Change Scoping Plan. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Energy
RPS Program and SB 2X: The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further required 50 percent renewables by 2030.[A] LADWP reports that, as of 2018, it has achieved 32% renewables and is on track to exceed the next state-legislated milestone of 33 percent by 2020.[B] However, under the recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. Additionally, the City's latest Green New Deal (an update of the Sustainable City pLAn) sets a target for LADWP to supply 55 percent renewable energy by 2025 and 80 percent by 2036. For 2045, the Green New Deal and SB 100 share the same 100 percent renewables requirement. The Project complies with these percentage renewables requirements inasmuch as the Project is served by LADWP, which is tasked with and committed to achieving the noted goals and requirements. The Project's electricity GHG emissions provided in **Table VII-4** do not account for these rapidly changing, and escalating, renewables requirements. By the Project buildout year of 2024, it is reasonable to assume that LADWP may supply approximately 50 percent renewable energy, in line with the Green New Deal's 55% target for 2025. **SB 350:** As required under SB 350, a doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, the California Energy Code (CEC), and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Energy Independence and Security Act of 2007 (EISA): EISA requires the phasing out of incandescent light bulbs sold in the United States, resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting. **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electricity service provides and not directly to land use development. That being said, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year would indirectly be covered by the Cap-and-Trade Program, though this is not quantified in the analysis. Furthermore, the program also covers GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.
Mobile

Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Advanced Clean Cars Program: CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by Project users. Mobile source GHG emissions estimated for the Project conservatively do not include this additional 34 percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation. The Scoping Plan recommends additional mobile source strategies through the extension of the Advanced Clean Cars Program which are expected to increase GHG stringency on light duty autos and continue adding zero emissions and plug in vehicles through 2030. CARB is also developing the Innovated Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.[C,D] Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Modified Project would also indirectly benefit from these measures once adopted. Low Carbon Fuel Standard (LCFS): The previous LCFS, adopted in 2007, required a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030.[E] This additional 10-percent reduction in CI would indirectly reduce mobile source emissions from Project users.
Solid Waste
California Integrated Waste Management Act of 1989: This regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.[F] AB 341 in 2011 amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[G] The Project complies with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent. Project-related GHG emissions would achieve at least a 50-percent reduction in solid waste generation source emissions, consistent with the minimum diversion rate required for the City of Los Angeles. It should be noted that the CalEEMod default diversion rate is zero percent, and this has not been adjusted to reflect AB 341. The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
A SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.
B LADWP. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-renewableenergypolicy?_adf.ctrl-state=1m681gocp_4&_ad)))))))&_afrLoop=296319701441951&_afrWindowMode=0&_afrWindowId=null#%40%3F_ad%2529%2529%2529%2529%2529%2529%2529%3D%26_afrWindowId%3Dnull%26_afrLoop%3D296319701441951%26_afrWindowMode%3D0%26_adf.ctrl-state%3Duquq0l6w9_17. Accessed August 1, 2021.
C CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.
D CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks. Accessed November 19, 2020.
E CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.
F California Integrated Waste Management Act of 1989 and AB 341.
G AB 341, 2011.
Source: NTEC, 2021.

Table VIII-2
Consistency Analysis – Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.	SCAQMD	**No conflict.** The Project would not include wood burning devices or stoves.
California Code of Regulations (CCR), Title 20: The 2016 Appliance Efficiency Regulations, adopted by the CEC, include standards for new applicants (e.g., refrigerators) and lighting, if they are sold or offered for sale in California	State and CEC	**No conflict.** The Project would be outfitted with appliances and lighting that comply with the CEC's standards, which are included in default CalEEMod parameters and thus reflected in Project-related estimated GHG emissions.

Table VIII-2
Consistency Analysis – Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
CCR, Title 24, Building Standards Code: The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State and CEC	**No conflict.** Consistent with regulatory requirements, the Project must comply with applicable provisions of the Los Angeles Green Code that in turn require compliance with Title 24 and the California Green Building Standards.[A] Nonresidential buildings built to the latest standards will use about 30 percent less energy than those built to the previous 2016 standards.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[B]	State/Manufacturers	**No conflict.** The Project would not conflict with the requirements under AB 1109 because it complies with local and state green building programs.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB, Regional, SCAG	**No conflict.** In 2018, CARB adopted a target reduction for the SCAG region of 19 percent for 2035 from passenger vehicle use. The Project would not conflict with requirements under SB 375 as the Project is an infill development located within a HQTA. Though the Project is not necessarily the type of dense, compact land use that is the primary focus of SCAG's RTP/SCS, the Project would nevertheless concentrate new development in an infill location well-served by transit and is therefore consistent with the RTP/SCS's

Table VIII-2
Consistency Analysis – Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		latest planning strategies to reduce VMT related GHG emissions.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emissions vehicle zones, parking pricing, transit discounts, etc.).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**No conflict.** The Project would not conflict with this policy, which would not be implemented at the Project level.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	**No conflict.** The Project would comply with applicable provisions of the 2020 Los Angeles Green Building Code, which in turn requires compliance with mandatory standards included in the California Green Building Standards.
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state has been required to make incremental progress toward this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary, and associated emissions, to convene, treat, and distribute water. It also reduces emissions from wastewater treatment.	CARB	**No conflict.** As discussed earlier, the Project would comply with applicable provisions of the 2020 Los Angeles Green Building Code, and in turn California Green Building Standards, that require a 20-percent water use reduction.
CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards	CARB	**No conflict.** The Applicant would use construction contractors that would comply with this regulation.

Table VIII-2
Consistency Analysis – Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
pursuant to an established compliance schedule.		
CARB In-Use On-Road Regulation: CARB's in-use on-road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.[C]	CARB	**No conflict:** The Applicant would use construction contractors that would comply with this regulation.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No conflict.** Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[D] The Project would comply with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.

[A] The 2019 Title 24 standards had an effective date of January 1, 2020.
[B] Assembly Bill 1109 (2007-2008 Reg. Session) Stats. 2007, Ch. 534.
[C] CARB, Truck and Bus Regulation – On-Road Heavy Duty Diesel Vehicles (In-Use) Regulation, www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.
[D] CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.
Source: NTEC, 2021.

Regional: 2020-2045 RTP/SCS

As discussed earlier, the 2020-2045 RTP/SCS is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions 8 percent by 2020 and by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance.

Generally, projects are considered consistent with the provisions and policies of applicable City and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS (as well as its previous iteration) involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. However, the Project does not propose such dense housing, employment, or commercial uses. As a result, this smart growth strategy is less relevant to the Project, especially considering that the availability of alternative transportation options would be unlikely to offset a substantial number of vehicle trips in the case of the Project. The Project's proposed self-storage use generates relatively few vehicle trips to begin with, and the nature of the use is somewhat reliant on vehicle transportation.

Nevertheless, the Project is located in a HQTA and across the street from the Reseda Orange Line Station, which would provide the opportunity for Project employees and other users to utilize the high quality bus transit options that service the area. Additionally, the Project would result in a substantial net reduction of vehicle trips as compared to the site's previous use. According to the Project's VMT report, development of the Project would result in a net reduction of 368 daily vehicle trips and 2,978 daily VMT as compared to the site's existing use. Given these considerations, the Project is appropriately located and does not conflict with the intent of the RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in an effort to reduce VMT and related GHG emissions.

Local: Sustainable City pLAn/Green New Deal

As discussed earlier, the Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Though the Sustainable City pLAn and its update, the City's Green New Deal, are not plans that have been adopted solely to reduce GHG emissions, L.A.'s Green New Deal includes climate mitigation as one of eight explicit benefits that help define its strategies and goals.

Generally, these plans provide information as to how the City will manage buildings and infrastructure in its control. They also provide specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s Green New Deal. This latest document establishes targets such as achieving 100 percent renewable energy by 2045,

diverting 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAn and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City's commitment to the goals and aspirations outlined in these documents.

Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Project Emissions

As described above, compliance with a GHG emissions reduction plan renders a Project less than significant. In support of the consistency analysis above, quantitative calculations of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- Construction: emissions associated with excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with the on-site use of powered equipment;
- Energy sources (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Mobile sources: emissions associated with the Project's related vehicle travel; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction

Project construction is anticipated to last approximately 15 months. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in **Appendix B**. The GHG emissions associated with the construction of the Project were calculated by year and totaled. A summary of GHG emissions for each year of construction is presented in **Table VIII-3**.

As shown in **Table VIII-3**, construction of the Project is estimated to generate approximately 321 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the

Project's annual operational emissions) in order to determine the Project's annual GHG emissions inventory.[52] This results in annual Project construction emissions of approximately 10.7 $MTCO_2e$.

Table VIII-3
Combined Construction-Related Emissions

Year	$MTCO_2e$[a]
2023	187.9
2024	132.9
Total	320.8
Amortized over 30 years	10.7

a CO_2e was calculated using CalEEMod and the results are provided in Appendix B.
Source: NTEC, 2021.

Operation

As shown in **Table VIII-4**, the Project is estimated to generate approximately 658.7 $MTCO_2e$ per year, including the addition of its annualized construction-related GHG emissions. This is approximately 171 less $MTCO_2e$ per year than is estimated to be generated by the Project Site's existing land use and operations. Therefore, development of the Project would result in substantial site-related reductions in GHG emissions.

Table VIII-4
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2e$[a]
Area	<1
Energy	132.6
Mobile	335.6
Solid Waste	49.0
Water/Wastewater	130.8
Construction	10.7
Total Emissions	658.7

Source: NTEC, 2021.

Cumulative Impacts

As explained earlier, the analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and its

52 SCAQMD Governing Board Agenda Item 31. December 5, 2008.

effect on global climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

This section is based on the following items, included as **Appendix F** of this MND:

- Phase I Environmental Site Assessment, Roux Associates, Inc., June 15, 2021.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of commercial storage unit. This typical urban use does not involve the routine use of hazardous materials**.** For example, the proposed use would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's commercial and associated office uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal number of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and

state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, impacts would be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Phase I

Roux's review indicates that the Site was historically developed with the Columbia College Hollywood production film school. Before that, the Site was initially vacant land prior to the initial development of rural residential structures which were first observed in 1928. The Site appears to have been occupied by residential structures into the 1960s but is observed to be vacant by 1967. The present-day commercial building was reportedly constructed in 1972 and is visible in the 1977 aerial photograph. Historical tenants at the Site include Panavision Inc. (1975 to 1995), which was reportedly a manufacturing operation of movie cameras. Between 1995 to present-day, the tenants have been the film school under the name Columbia College Television or Columbia College Hollywood

Roux revised a Phase I ESA, prepared by Certified Environmental Consultants (CEC) and dated March 23, 2017. This report was prepared for Columbia College Hollywood. In this report, CEC stated that they had previously prepared a Phase I ESA report for the Site in 2010, which followed two earlier Phase I ESAs prepared by others in 2004 and 2007.

In this 2017 report, CEC acknowledge that the Site is undergoing active depressurization/remediation as a result from subsurface contamination originating on the adjacent-east property. CEC noted that the "reviewed monitoring data indicated the depressurization/remediation system's contaminant-recovery values had significantly declined since initial operation of the system, which began in 2012, and near asymptotic declines were reported for the more-recent data" (CEC, 2017). CEC did not specifically identify any RECs or significant data gaps and concluded that the Site was "satisfactorily screened for potential environmental concerns" and "no additional site assessment or remediation activities presently are deemed necessary or recommended" (CEC, 2017).

Overall, there are no Recognized Environmental Conditions (RECs) in connection with the property. Roux also did not identify known or suspected Historical RECs in connection with the current and historical operations at the Site or adjacent properties.

The Phase I identified the following potential business environmental risks:

- The building is designed for the current use, if future plans include changing use the SSDS system may need to be modified. Additional usage of the undeveloped portion of the property would need to evaluate and potentially install a SSDS.

Oil and Gas Wells

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.[53]

Methane

The Project Site is not within a Methane Buffer Zone.[54]

Operational Health Hazards

The Project shall be maintained in a neat, attractive, and safe condition at all times. On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times. Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers shall be emptied a minimum of once per week. Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris. Operational impacts would be less than significant.

Compliance with existing applicable laws would ensure that impacts during construction and operation would be less than significant.

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

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

The Discovery School (18719 Topham Street) is located 600 feet northwest of the Site.

As discussed previously, the types of hazardous materials that would be found on the Project Site during the Project's operational phase would be typically associated with commercial land uses – paints, cleaning supplies, small amounts of petroleum products. The Project would not require routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment.

53 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#close/, accessed July 2021.

54 ZIMAS search: http://zimas.lacity.org/.

To the extent there would be any such transport, use, or disposal, compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Additionally, no RECs were identified on the Project Site. Any potential ACMs and/or mold found would be remediated in accordance with existing regulations. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, Project impacts related to this issue would be less than significant.

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

In 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[55]

As discussed in detail above in response to Checklist Question VIII(b), the construction and operation of the Project would not create a significant hazard to the public or the environment, as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on this, development of the Project would not cause or exacerbate a significant hazard to the public or the environment. Therefore, no impacts related to this issue would occur as a result of the Project.

55 Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60001142, April 25, 2019.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within two miles of a public airport. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The City's General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, that identifies emergency evacuation routes, along with the location of selected emergency facilities.

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by the City would ensure that Project impacts related to emergency response would be less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City and is completely developed. The Project Site is not subject to potential wildland fires. Thus, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the Project Site boundaries. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water

discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[56] The Project is subject to the requirements of the SUSMP, which are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. Accordingly, the Project is subject to LID.

A project must comply with the LID Best Management Practices (LID BMPSs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include 1. Infiltration Systems, 2. Stormwater Capture and Use, 3. High Efficiency Biofiltration/Bioretention Systems, and 4. Combination of Any of the Above.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which,

56 Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.

when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts and the City's Low Impact Development (LID) Ordinance. The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists.

As a result, the Project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing condition of the Project Site and its surroundings. Therefore, impacts would be less than significant.

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

No Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is the Los Angeles River, approximately 1-mile north from the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site.

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water

District (MWD) and groundwater.[57] The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, no impact would occur.

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

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City. There are no natural watercourses on the Project Site or in the vicinity of the site. As discussed above, the Project Site is completely developed and is considered 100 percent impervious. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site also would be considered 100 percent impervious, and drainage patterns would be much the same as under the existing condition. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would control the amount of surface water runoff leaving the Project Site during a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

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

Less Than Significant Impact. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the

57 LADWP, Water, Sources of Water: https://www.ladwp.com/, accessed March 24, 2020.

amount of surface water runoff leaving the Project Site as compared to the current conditions. Therefore, impacts would related to this issue would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system along Oxnard Street.[58]

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 10(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Additional discussion of the construction and operation impacts is provided below.

Construction

The Project would require excavation for utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively reduce the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these “good-housekeeping” practices would reduce dust

58 Navigate LA, Storm Drains Layer: http://navigatela.lacity.org/navigatela/.

and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the LID Best Management Practices, which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project design plans. Compliance with existing regulations would ensure the potential for construction water quality impacts are less than significant.

Operation

Activities associated with operation of the Project will not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing parking lot and developing a storage project, the type of urban runoff would likely improve in quality. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure operational water quality impacts are less than significant.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[59] Also, the Project Site is not located near any bodies of water. Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[60]

The Project is located approximately 1-mile from the Los Angeles River. However, the Project is not located within an area potentially impacted by a tsunami.[61]

59 FEMA, https://msc.fema.gov/portal/search?AddressQuery=350%20Hill%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor, effective on 9-26-2008; and City of Los Angeles General Plan Safety Element, Exhibit F.

60 Page II-16, Los Angeles General Plan Safety Element, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 24, 2020.

61 ZIMAS search: http://zimas.lacity.org/.

There are no major water-retaining structures located immediately upgradient from the Project Site. Therefore, flooding from a seismically-induced seiche is considered unlikely.

The Project Site is not located within an area designated as a 100-year flood hazard area.[62] In addition to the low risk of flooding, the Project includes LID requirements for capture and use and/or biofiltration system and a stormwater conveyance system, which would be improve upon the existing site, which is devoid of treatment and on-site detention. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Therefore, no tsunami or seiches would be expected to impact the Project Site that would risk release of pollutants due to Project inundation. No impact would occur.

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

No Significant Impact. Refer to responses to Checklist Questions X(a) (Hydrology and Water Quality – Water Quality) and X(b) (Hydrology and Water Quality – Groundwater). As discussed there, the Project would not result in any significant impacts related to water quality or groundwater.

Cumulative Impacts

The sites of the Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

62 NavigateLA, FEMA Flood Hazard layer: http://navigatela.lacity.org/navigatela/, March 24, 2020.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a. Physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site and is contiguous and bounded by streets. In addition, the Site is not large enough to encompass an established community. The Project's uses are compatible with the residential and commercial uses in the area. Throughout the City and near the Project Site, there are similar uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. Therefore, no impact would occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, no impact would occur.

REGULATORY FRAMEWORK

SCAG's 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically, and SCAG has created a 2020-2045 updated RTP/SCS called Connect SoCal. On May 7, 2020,

SCAG's Regional Council adopted Connect SoCal for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020.

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Consistency Discussion

As discussed on **Table XI-1**, the Project would be substantially consistent with the goals of the 2020-2045 RTP/SCS.

Table XI-1
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable/Consistent.** This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct a storage facility near other commercial uses in an urbanized area, supporting the regional economic prosperity and global competitiveness of Southern California.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in a highly urbanized area in the City. The Project includes development of a storage facility within an HQTA and a Living Corridor, as defined by SCAG, and also in close proximity to existing residential and commercial uses. Also, the Project would ensure safe travel at and near the Project Site by improving the public

Table XI-1
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
	sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. Furthermore, the Project would be subject to the site plan review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project includes development of a storage facility near other residential and commercial uses. The Project would include 60 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing VMT.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project includes development of a storage facility near other commercial uses. The Project would include 60 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project would construct a storage facility near residential and commercial uses. Given the urban nature of the Project Site area, Project employees would be able to walk and bike to/from work. addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project includes development of storage facility on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes pedestrian improvements and 60 bicycle parking spaces. The Project Site's proximity to

Table XI-1
Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
	transit and the Project's inclusion of bicycle parking and pedestrian amenities help to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS, adopted May 2020.	

South Coast Air Quality Management District Air Quality Management Plan

The Project Site is located within the South Coast Air Basin (Basin) and within the jurisdiction of SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP. and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and vehicle miles traveled (VMT). Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.[63]

Consistency Discussion

As discussed in detail in response to Checklist III(a) (Air Quality – Consistency with the AQMP), the Project would be consistent with the AQMP.

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in

[63] 2016 Air Quality Management Plan, Executive Summary; South Coast Air Quality Management District; https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/executive-summary.pdf?sfvrsn=4.

the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the Encino-Tarzana Community Plan (Community Plan) Area, discussed below.

Consistency Analysis

As discussed on **Table XI-2**, the Project would be substantially consistent with the Framework Element.

Table XI-2
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	**Consistent.** The Project includes development of storage facility building to serve the needs of the community.
3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. The Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. The Project includes development of a storage facility building to serve the

Table XI-2
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	needs of the community. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
Source: City of Los Angeles General Plan.	

Health and Wellness Element

The Health and Wellness Element (also known as Plan for a Healthy Los Angeles) lays the foundation to create healthier communities for all Angelenos. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

With a focus on public health and safety, the Health and Wellness Element provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive.

The Health and Wellness Element accomplishes two policy objectives: it elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Health and Wellness Element acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City.[64]

The Health and Wellness Element is underpinned by seven goals and identifies new policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. Each goal includes supporting objectives to track improvements to community health.

1. Los Angeles, a Leader in Health and Equity

64 Implementation of the Health and Wellness Element is addressed through programs, ordinances, and Community Plans, among other planning policy documents, which allow for the flexibility needed to address the specific needs of the City's diverse communities. References to neighborhoods usually reflect the Community Plan Area boundaries used by the Department of City Planning, but the City recognizes the fluidity and diversity of the City's neighborhoods.

2. A City Built for Health
3. Bountiful Parks and Open Spaces
4. Food that Nourishes the Body, Soul, and Environment
5. An Environment Where Life Thrives
6. Lifelong Opportunities for Learning and Prosperity
7. Safe and Just Neighborhoods

Consistency Discussion

As discussed on **Table XI-3**, the Project would be substantially consistent with the Health and Wellness Element.

Table XI-3
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
1.3 Promote healthy communities by focusing on prevention, interventions, and by addressing the root causes of health disparities and inequities in Los Angeles.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking.
1.5 Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site.
2.1 Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
2.2 Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street

Table XI-3
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
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.	corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use. These positive environmental effects of the Project are in alignment with the Health and Wellness Element.
2.3 Strive to eliminate barriers for individuals with permanent and temporary disabilities to access health care and health resources.	**Consistent.** Design of the Project would comply with all existing federal, state, and local regulations including the Americans with Disabilities Act.
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.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
3.8 Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across ages and level of abilities.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.	**Consistent.** The Project is an infill develop on a site that already served by existing roadways and nearby transit facilities. The Project Site is located along the Oxnard Street corridor, which is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes improvements to the pedestrian access facilities adjacent to the Project Site, including new sidewalks and landscaping, which would

Table XI-3
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	encourage walking. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.
5.3 Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.	**Consistent.** The Project would reduce exposure to second-hand smoke in accordance with applicable law.
5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.	**Consistent.** As discussed in response to Checklist Question III(c) (Air Quality – Sensitive Receptors), the Project would not expose sensitive receptors to pollutant emissions in excess of SCAQMD's significance thresholds. Also, the Project's commercial uses would not include hazardous materials, such as a dry cleaner. As discussed in response to Checklist Question III(d) (Air Quality – Odors), the Project would not result in any impacts related to odors.
5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	**Consistent.** As discussed in response to Checklist Question VIII(a) (Greenhouse Gas Emissions), the mixed-use nature of the Project, its proximity to transit, and compliance with the City's Green Building Code would reduce the Project's GHG emissions profile and the Project would be consistent with applicable GHG reduction plans and strategies. As discussed in in detail there, Project impacts related to GHG emissions would be less than significant.
7.2 Continue to promote the development and implementation of comprehensive strategies that foster safe passages in neighborhoods with high crime and gang activity to ensure that all Angelenos can travel with confidence and without fear.	**Consistent.** The Project would include adequate lighting provided (in accordance with LAMC requirements, including LAMC Section 91.8607) to ensure safe lighting for pedestrian paths. Numerous windows would be located on the streets surrounding the Project Sites, as well as along the Project's internal circulation, placing "eyes on the street." Additionally, prior to issuance of a building permit, the Project Applicant would be required to coordinate with the Los Angeles Police Department (LAPD) and incorporate all safety features into the design of the Project to maximize safety at the Project Sites.
Source: City of Los Angeles, Health and Wellness Element of the General Plan, March 2015.	

Encino-Tarzana Community Plan

The Community Plan is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the General Plan. The Community Plan is intended to promote an arrangement of land uses, streets and services, which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

Consistency Discussion

As discussed on **Table XI-4**, the Project would be substantially consistent with the Community Plan.

Table XI-4
Project Consistency with Applicable Policies/Objectives
of the Encino-Tarzana Community Plan

Policy/Objective	Project Consistency
Objective 2-1: To conserve and strengthen viable commercial development.	**Consistent.** The Project would replace outdated institutional/commercial buildings with a new attractively designed storage building, which would be easily accessible to nearby employees and visitors, who may travel to the building by foot, transit, or bicycle. The building would enhance the existing commercial environment along Oxnard Street by encouraging additional pedestrian traffic to the Project Site.
Objective 2-4: To enhance the appearance of commercial districts.	**Consistent.** The Project would replace outdated institutional/commercial buildings with a new attractively designed storage building, which would be easily accessible to nearby employees and visitors, who may travel to the building by foot, transit, or bicycle. The building would enhance the existing commercial environment along Oxnard Street by encouraging additional pedestrian traffic to the Project Site.
Policy 13-2.1: No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.	**Consistent.** The Project would replace outdated institutional/commercial buildings with a new attractively designed storage building, which would be easily accessible to nearby employees and visitors, who may travel to the building by foot, transit, or bicycle. The building would enhance the existing commercial environment along Oxnard Street by encouraging additional pedestrian traffic to the Project Site.
Source: Encino-Tarzana Community Plan.	

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[65] MRZ-2 sites are identified in two community plan elements of the City's General Plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[66]

Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas.[67] The California Geologic Energy Management Division (CalGEM) online

65 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed February 24, 2022.

66 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed February 24, 2022.

67 City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed February 24, 2022.

mapping of wells shows there is no oil and gas well on the Site.[68] Therefore, no impact would occur.

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

No Impact. A significant impact would occur if a project were located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 12(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impact would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

68 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#close/, accessed February 24, 2022.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The information in this section is based primarily on the following (refer to Appendix G):

- Noise and Vibration Technical Data, Noah Tanski Environmental Consulting, September 2021.

ENVIRONMENTAL SETTING

Fundamentals of Noise and Vibration

Introduction to Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. **Table XIII-1** provides examples of A-weighted noise levels from common sources. Although the terms “sound” and “noise” are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected,

or undesired.[69] Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Table XIII-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis, but are provided for the reader to gain a rudimentary concept of various noise levels.	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (Leq)

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (Lmax)

L_{max} represents the highest instantaneous noise level of a specified time period.

69 California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Minimum Noise Level (Lmin)

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq}.

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded *X* percent of a specified time period. For example, L_{90} represents the noise level that is exceeded 90 percent of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.[70]

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.[71] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[72]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.[73]

70 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

71 National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.

72 World Health Organization, Guidelines for Community Noise, 1999.

73 Ibid.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.[74] Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.[75] However, few people are highly annoyed by daytime noise levels below 55 dBA.[76]

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has determined that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100 percent intelligibility of speech sounds.[77] Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration such as reading. The EPA has surmised that, given the preservation of an indoor noise level associated with 100 percent speech intelligibility, the average community reaction is not evident and "7 dBA below levels associated with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distance from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at the rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources such as highways attenuates at the rate of 3 dBA for each doubling of distance.[78]

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as soft dirt or grass may contribute to increased attenuation rates of up to an additional 8 to 10 dBA per doubling of distance.[79]

74 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

75 Ibid.

76 World Health Organization, Guidelines for Community Noise, 1999.

77 EPA, Information on Levels of Environmental Noise Requisite to Project Public Health and Welfare with an Adequate Margin of Safety, 1974.

78 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

79 Ibid.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Barriers can reduce source noise levels by up to 20 dBA, though it is generally infeasible for temporary barriers to reduce source noise levels by more than 15 dBA.[80] In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.[81]

Introduction to Vibration

Characteristics of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.[82] Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.[83] The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.[84]

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV).

Peak Particle Velocity (PPV)

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).[85]

80 Ibid.
81 Ibid.
82 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.
83 Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.]
84 Ibid.
85 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

Regulatory Framework

Noise

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or otherwise evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but recommendations intended to aid communities in determining their noise-acceptability standards.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect workers and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown on **Table XIII-2**. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter…" "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks." The Noise Element further instructs that the table is designed "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations.

Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.*
>
> (a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

Table XIII-2
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

A = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
C = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.
N = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
U = Clearly Unacceptable - New construction or development should generally not be undertaken.
Source: Noise Element of the Los Angeles City General Plan – Exhibit I

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would likely be used for the Project's construction. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line, as the Project is located within 500 feet of residential zones.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a) would prevent Project heating, ventilation, and air conditioning (HVAC) systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Vibration

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, and City standards specific to temporary construction activities.

Federal

Federal Transit Administration (FTA)

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as potential building and structural damages are the generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table XIII-3** summarizes the FTA's vibration guidelines for building and structural damage.

Table XIII-3
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

State

There are no state standards that directly regulate groundborne vibration related to the construction or operation of the Project.

City of Los Angeles

There are no City standards that directly regulate groundborne vibration related to the construction or operation of the Project.

EXISTING CONDITIONS

Noise-Sensitive Receptors

The Project is located in a mixed-use neighborhood and surrounded by a variety of land uses including healthcare facilities, manufacturing warehouses, maintenance/truck yards, retail establishments, and residences. The closest noise-sensitive receptors to the Project are as follows:

- Tarzana Terrace: This multifamily residential complex is located at 18601 Hatteras Street, directly south of the Project.

- Tarzana Treatment Center, Inc.: This healthcare facility is located at 18646 Oxnard Street, approximately 20 feet west of the Project Site. It is assumed that this facility may contain live-in treatment patients and associated staff.

Other receptors are located at greater distances from the Project and would experience lesser impacts. Additionally, there are no schools, hospitals, or other non-residential noise-sensitive receptors located within 500 feet of the Project that may be exposed to substantial noise levels from the Project's construction or operations. Discovery School (18719 Topham Street) is located nearly 700 feet northwest of the Project, for example. As such, the following analysis focuses on Tarzana Terraces residences and Tarzana Treatment Center, Inc., in order to assess the significance of the Project's potential noise impacts.

A map showing the location of the Project and nearby sensitive receptors is included in **Appendix G**.

Existing Ambient Noise Levels

On July 30, 2021, noise measurements were obtained at two locations along Oxford Street and Baird Avenue to aid in the characterization of daytime ambient noise conditions surrounding the Project and its nearest sensitive receptors. At both locations the primary source of noise levels was vehicular traffic. The measured noise levels are shown in **Table XIII-4**, below.

Table XIII-4
Existing Noise Levels

Noise Measurement Location	Sound Levels (dBA, Leq)
1. Oxnard Street, near Project	63.7
2. Baird Avenue, near cul-de-sac	52.4
Source: NTEC, 2021.	

For the analysis contained in this report, the 63.7 dBA L_{eq} noise level measurement has been applied to Tarzana Treatment Center, Inc., as this noise level was measured near the receptor along Oxnard Street. For Tarzana Terrace, it was not possible to obtain a noise measurement from the area where the Project abuts this receptor (it is private property). This area is

approximately 470 feet south of Oxnard Street, which is the primary source of noise in the vicinity of the Project. As an alternative approach, a noise measurement was taken near the Baird Avenue cul-de-sac. As this location is also approximately 470 feet south of Oxnard St, and because Baird Avenue has little traffic itself, the 52.4 dBA L_{eq} noise level measured at this location is likely similar to noise levels present at the area where the Project abuts Tarzana Terrace. Therefore, the 52.4 dBA L_{eq} noise level measurement has been applied to Tarzana Terrace.

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. As discussed below, the Project's construction-related noise levels could exceed the City's significance thresholds. However, with mitigation, the Project's construction-related noise impacts would be less than significant. With regard to operational noise, the Project's operational noise levels would not exceed the City's significance thresholds, and the Project operational noise impacts would be less than significant.

Methodology

On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the noise levels of construction equipment with the greatest potential to disrupt nearby sensitive receptors and assessing the noise increases that could result from their operations. Reference equipment noise levels were derived from the Federal Highway Administration's Roadway Construction Noise Model, version 2.0 (FHWA RCNM 2.0).

Off-Site Construction Activities

The Project's off-site construction noise impact from haul trucks was assessed by estimating the Project's number of haul trips and comparing this figure with surrounding traffic levels to determine significance.

On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was assessed by identifying likely on-site noise sources and considering the impacts they could produce given the nature of the source (i.e., loudness and/or whether noise would be generated during daytime or more-sensitive nighttime hours), distances to nearby noise-sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC.

Off-Site Operational Noise Sources

The Project's off-site operational noise impact from its related traffic generation was assessed by modeling the noise impacts of the Project's traffic generation via the FHWA's Traffic Noise Model, version 2.5 (TNM 2.5), and comparing the results to existing ambient noise conditions.

Construction Vibration Sources

The Project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at nearby buildings, all based on the principles and guidelines recommended by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories (**Table XIII-3**).

Operational Vibration Sources

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. The Project proposes to construct a self-storage facility, and no such operations would take place.

Thresholds of Significance

The following thresholds are adopted to aid in the determination of the Project's noise impacts:

State CEQA Guidelines: Appendix G

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to noise if the Project would result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b) Generation of excessive groundborne vibration or groundborne noise levels?

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

On-Site Construction Noise Threshold

Based on guidelines from the City of Los Angeles Department of Planning, the Project's construction noise impact would normally be considered significant if the following would occur:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA L_{eq} or more at a noise-sensitive land use;

- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq} or more at a noise-sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

The averaging period shall be equivalent to the duration of a single workday, from start to finish of that day's construction activities.

Operational Noise Thresholds

In addition to applicable City standards and guidelines that would regulate or otherwise manage the Project's operational noise impacts, the following criteria are adopted to assess the impacts of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise and land use compatibility categories, as defined by the City's General Plan Noise Element (see **Table XIII-2**).

- Project operations would cause any 5 dBA or greater noise increase.[86]

Groundborne Vibration Threshold

As discussed earlier, there are no federal, state, county, or City standards that would regulate the Project's vibration impacts from temporary construction activities, nor are there quantitative thresholds. As a result, based on guidance from the City of Los Angeles Department of Planning, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual (see **Table XIII-3**) are used where applicable and relevant to assist in analyzing the Project's groundborne vibration impacts as they pertain to Appendix G checklist question (b).

PROJECT IMPACTS

On-Site Construction Activities

The proposed construction would generate noise during the estimated 15 months of demolition, grading, building construction, architectural coatings, and other related construction activities.

86 As a 3 dBA increase represents a barely noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. For instances when the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase would still be considered significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

During all construction phases, noise-generating activities would be permitted to occur at the Project site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M, but the Project is anticipated to utilize a five-day work week and an eight-hour workday.

Noise from demolition and grading activities is typically the foremost concern when evaluating a project's construction noise impact, as these activities often require extensive use of heavy-duty, diesel-powered earthmoving equipment. The following analysis assesses noise impacts that may result from the Project's demolition and grading phases. Noise impacts that may result from other construction phases would not exceed those that would occur during the Project's demolition and grading phases.

Demolition would primarily involve the removal of the site's southern parking lot in order to grade for and construct the new self-storage building. The bulk of demolition activity would be characterized by skid steer loaders removing the parking lot's asphalt and sub-base layers, then dumping debris either directly into haul trucks or into large dumpsters that would be trucked off-site. As the FHWA's RCNM 2.0 equipment database does not reference noise data for skid steer loaders, RCNM 2.0 data for front-end loaders was utilized for the following analysis. Front-end loaders can produce maximum noise levels of 72.4 dBA L_{eq} at 50 feet when performing work cycles.

However, it should be noted that the RCNM 2.0's front-end loader data is based on noise measurements of front-end loaders that are between 188 and 192 horsepower; skid steer loaders utilized by the Project are likely to be less than 100 horsepower and less noisy as a result.

Table XIII-5 shows the noise impact from the Project's parking lot demolition that has been estimated by calculating the average noise levels in L_{eq} that could result from skid steer loaders removing asphalt and other parking lot debris over the course of a workday. Other demolition activities related to the adaptive re-use of the site's existing building would occur mostly within the interior of that structure and result in lesser noise increases at sensitive receptors.

Table XIII-5
Estimated Exterior Construction Noise Levels at Sensitive Receptors - Unmitigated

Sensitive Land Uses[a]	Noise Level from Construction (dBA L_{eq})	Existing Monitored Ambient Noise Level (dBA L_{eq})	Combined Noise Level (dBA L_{eq})	Increase (dBA)
Tarzana Terrace	67.1	52.4	67.3	14.9
Tarzana Treatment Center, Inc.	65.1	63.7	67.5	3.8
Source: NTEC, 2021.				

As shown, noise increases due to skid steer loader usage for parking lot demolition would exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities at Tarzana Terrace.

Therefore, before mitigation, the Project's construction noise impact from demolition would be considered significant.

The proposed new building would contain no subgrade levels requiring basement excavation, but the site would require grading by a bulldozer. A bulldozer can produce a maximum noise level of 80.0 dBA L_{eq} at a reference distance of 50 feet when performing work cycles. **Table XIII-6** shows the noise impact from grading that has been estimated by calculating the average noise levels in L_{eq} that could result from a bulldozer grading the site of the proposed new building over the course of a workday. Other grading activities, such as trenching or soil compaction, would generate noise on a more intermittent basis and result in lesser noise increases at sensitive receptors when measured over the course of a single workday, as per the threshold of significance.

As shown, though, noise increases due to bulldozer operations for grading would exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities at Tarzana Terrace and Tarzana Treatment Center, Inc. Therefore, before mitigation, the Project's construction noise impact from grading would be considered significant.

Table XIII-6
Construction Noise Levels – Grading (Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Equipment: Bulldozer				
Tarzana Terrace	71.7	52.4	71.8	19.4
Tarzana Treatment Center, Inc.	69.7	63.7	70.7	7.0
Source: NTEC, 2021.				

Mitigation Measures

To ensure that the Project's construction-related noise increases at Tarzana Terrace and Tarzana Treatment Center, Inc., do not exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities, the following mitigation measures are required:

MM-NOISE-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project Site's western, southern, and eastern boundaries that face Tarzana Terrace and Tarzana Treatment Center, Inc., and that generally bound the Project's driveway and parking lot areas. The prescribed sound barriers shall be installed for the duration of the Project's construction activities.

MM-NOISE-2 Bulldozers and other construction vehicles utilized to grade for the Project shall limit their daily usage to no more than four hours per workday.

Impacts after Mitigation

As shown in **Table XIII-7** and **Table XIII-8**, implementation of **Mitigation Measures MM-NOISE -1 and MM-NOISE -2** would reduce the Project's demolition and grading-related noise impacts at Tarzana Terrace and Tarzana Treatment Center, Inc., to below the 5 dBA L_{eq} threshold of significance. As noise levels due to other construction phases and activities would not exceed the noise levels analyzed in this report, implementation of **Mitigation Measures MM-NOISE-1** and **MM-NOISE -2** would also ensure that all other construction noise impacts to Tarzana Terrance and Tarzana Treatment Center, Inc., are less than significant.

Thus, the Project's construction noise impact from onsite noise sources after implementation of **Mitigation Measures MM-NOISE -1** and **MM-NOISE -2** would be less than significant with mitigation. It should also be noted that **Mitigation Measure MM-NOISE -1** would further ensure that the Project's construction equipment noise levels do not exceed the 75 dBA L_{eq} at 50 feet noise limit set forth by LAMC Section 112.05.

Table XIII-7
Construction Noise Levels – Demolition (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Equipment: Skid steer loaders				
Tarzana Terrace	52.1	52.4	55.3	2.9
Tarzana Treatment Center, Inc.	50.1	63.7	63.9	0.2
Source: NTEC, 2021.				

Table XIII-8
Construction Noise Levels – Grading (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Equipment: Skid steer loaders				
Tarzana Terrace	53.7	52.4	56.1	3.7
Tarzana Treatment Center, Inc.	51.7	63.7	64.0	0.3
Source: NTEC, 2021.				

Off-Site Construction Activities

Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles. However, the operations of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. During the Project's grading phase, an estimated 43 haul trips (86 one-way trips) would be required to import an estimated 600 cubic yards of soils to a regional provider (assuming a 14 cubic yard haul truck capacity). Over the course of the Project's one-month

grading phase, this is unlikely to generate more than a maximum 20 haul trips (40 one-way trips) per workday. And over the course of an eight-hour workday, this would correspond with an average of five one-way trips per hour. This addition of an average five one-way haul trips per hour (one haul trip every 12 minutes) to Oxnard Street, Reseda Boulevard, and any other roadway(s) that haul trucks might utilize would not have a discernible effect on roadside ambient noise levels, much less a 5 dBA L_{eq} increase over the course of a workday. Therefore, the Project's noise impact from off-site construction sources would be less than significant.

On-Site Operational Noise Sources

The Project's potential on-site operational noise sources are identified and discussed below. As discussed, noise impacts of the Project's sources of on-site operational noise would be less than significant.

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noises from mechanical sources such as heating, air conditioning, and ventilation systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation and the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. HVAC systems associated with the Project's proposed medical office building would be placed near the location of the Project's existing commercial uses that also contain rooftop-mounted HVAC units.

As a result, the medical office building's HVAC systems are unlikely to result in a substantial change to the environment, especially considering that the Project would install new HVAC units with more modern, and therefore presumably quieter and more efficient, systems. Rooftop-mounted HVAC systems associated with the Project's proposed storage facility would be located at an elevation of approximately 60 feet and screened behind parapets or other architectural features that would block their line of sight to nearby residential uses. Furthermore, it should be noted that many land uses in the vicinity of the Project Site also contain rooftop-mounted HVAC equipment, including commercial uses along Ventura Boulevard and the 4949 Genesta Avenue multi-family residential building. Given these considerations, it stands to reason that the Project's HVAC equipment would not substantially alter surrounding ambient noise conditions.

Auto-Related Activities

Parking spaces would be located on a small surface lot. Any auto-related noises (e.g. doors slamming, engines starting) would be substantially attenuated and likely inaudible at off-site receptor locations. The Project's proposed surface lot would consist of car/van spaces located to the west of the building. Considering that the Project's existing use, it is likely that the Project's net reduction of unenclosed surface parking spaces could result in a reduction of on-site auto-related noises.

Overall, the Project is located in a neighborhood with a mix of residential, commercial, retail, and industrial uses. A similar self-storage land use is located approximately 600 feet west of the Project, also along Oxnard Street (18716 Oxnard Street). The Project is therefore consistent with nearby land uses and would not alter the noise environment of its surroundings by a substantial degree or the minimum 3 dBA CNEL increase that would represent a significant impact. As a result, the impact of the Project's on-site operational noise sources would be less than significant.

Off-Site Operational Noise Sources

On a typical weekday, the Project is estimated to result in a net reduction of 368 daily trips, including a net reduction of 55 A.M. peak hour trips and a net reduction of 47 P.M. peak hour trips. As a result, the Project's off-site operational noise impact from its related traffic generation would be less than significant.

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

Less Than Significant Impact.

Building Damage Vibration Impact

Grading and parking lot paving activities would require the use of vibratory compacting equipment, including a vibratory roller. Vibratory rollers can produce vibration levels of 0.210 inches per second PPV at a reference distance of 25 feet according to the FTA.[87]

As shown in **Table XIII-9** below, the Project's use of a vibratory roller would not generate groundborne vibration in excess of FTA building damage thresholds at Tarzana Treatment Center, Inc., and Tarzana Terrace, the two structures nearest to the Project Site. Other structures are located in excess of 100 feet from the Project Site and would experience reduced groundborne vibration levels. As a result, the Project's construction-related vibration impact would be less than significant.

Table XIII-9
Building Damage Vibration Levels at Off-Site Structures – Unmitigated

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
Equipment: Vibratory Roller					
Tarzana Treatment Center	20	I. Reinforced concrete, steel, or timber	0.5	0.268	No
Tarzana Terrace	25	I. Reinforced concrete, steel, or timber	0.5	0.210	No
Source: NTEC, 2021. Reference vibration levels obtained from the FTA's 2018 Transit Noise and Vibration Impact Assessment manual.					

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

Operational Vibrations Impact

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. As a result, the Project's potential to generate excessive ground-borne vibration levels due to its operations would be less than significant.

c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located in the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport. The closest airport is the Van Nuys Airport located approximately 4.9 miles northwest of the site. Thus, implementation of the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Construction Noise

As discussed previously, the Project's construction activities would temporarily increase ambient noise levels at nearby noise-sensitive land uses. Without mitigation, impacts to Tarzana Terrace and Tarzana Treatment Center, Inc., would be considered significant. After the implementation of **Mitigation Measures MM-NOISE-1** and **MM-NOISE-2**, impacts to these receptors would be less than significant, meaning that the Project's construction activities would not increase ambient noise levels at these receptors by more than 5 dBA L_{eq}. Any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at these receptors and result in cumulatively considerable impacts, meaning that the combined influence of construction noise from the Project and other nearby related projects could potentially result in ambient noise level increases in excess of 5 dBA L_{eq} at surrounding sensitive receptors. However, no other related project has been identified within 500 feet of the Project or Tarzana Terrace and Tarzana Treatment Center, Inc., at the time of this report. As such, the potential for the Project's construction activities to result in cumulatively considerable noise impacts at these and other surrounding receptors would be less than significant.

Concerning vibration, the Project would generate construction-related groundborne vibrations at nearby structures that are below thresholds associated with building damage. There are no related projects identified within 500 feet of the Project and its vibration receptors. Accordingly, there is no potential for cumulatively considerable vibration impacts at shared receptors and impacts would be less than significant.

Operational Noise

As discussed earlier, the Project's on-site operational noise sources, such as roof-mounted HVAC equipment, would have a minimal effect on surrounding ambient noise levels. Additionally, the Project would result in a net reduction of site-related vehicle trip generation. Given these considerations, the effect of the Project's operations on surrounding ambient noise conditions would be nominal and therefore would not contribute meaningfully to any cumulatively considerable noise increases. Less than significant.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project includes demolition and removal of the institutional buildings and surface parking areas from the Project Site and redevelopment of the Project Site.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so 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. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, the Project's indirect unplanned population growth impacts associated with construction activities would be less than significant.

Operation

The existing institutional building and associated employment would be removed from Site and replaced with a 97,846-square-foot storage building, which would also provide employment. These storage facility types of jobs could be filled via the existing workforce from within the Project Site area or the Los Angeles region. The storage facility component of the Project would not create the types of employment opportunities that would compel numerous people to move to the City from areas outside regions. Thus, employment associated with the Project Site development would not induce substantial unplanned population growth in the City. Therefore, impacts related to unplanned population growth associated with employment would be less than significant.

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

No Impact. The Project Site is currently developed with institutional, and parking uses. No housing is on the Project Site, and no people live at the site. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Some of the related projects would result in a net increase in the number of housing units and associated population and the amount of employment in the Project Site area and would contribute to growth in the City. However, as discussed previously, the Project includes development that would accommodate existing employees and visitors and the existing workforce in the City. The Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth. Therefore, cumulative impacts related to unplanned growth would be less than significant.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.[88]

Regulations

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. The Fire Prevention and Protection Chapter (Chapter V, Article 7) of the LAMC, known as the Los Angeles Fire Code, sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires and life safety hazards, the elimination of fire and life safety hazards in any building or structure (including buildings under construction), the maintenance of fire protection equipment and systems, and the storage, use, and handling of hazardous materials.[89]

88 http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

89 Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed under permit of the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project will comply with these requirements of the Fire Code, as applicable.

All ingress/egress associated with the Project (e.g., via Oxnard Street) would be designed, verified in the building permit process by LADBS and LAFD, and constructed in conformance with all applicable City Building and Safety Department and LAFD standards and requirements for design and construction.[90] Therefore, the Project would comply with emergency access requirements of the City.

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and LAFD's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Fire-flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required gallons per minute flowing. Based on a required fire-flow of 6,000 to 9,000 gpm the first-due Engine Company should be within 1 mile, the first-due Truck Company within 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.

According to LAMC Section 57.512.1,[91] response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3 (recreated below).[92] For a manufacturing related land use, the maximum response distance is 1.0 mile for an engine company and 1.5 miles for a truck company. The maximum response distances for both fire suppression companies (engine and truck) must be satisfied.

90 LAMC, Article 7 of Chapter V.

91 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.

92 LAMC Table 57,507.3.3, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_TABLE57.507.3.3

Table XIV-1
Response Distances That If Exceeded Require the Installation Of An Automatic Fire Sprinklers System

* Land Use	Required Fire-Flow	Maximum Response Distance **	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
High Density Residential and Commercial Neighborhood	4,000 gpm from four adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four hydrants flowing simultaneously	1 mile	1-1/2 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required)	3/4 mile	1 mile

gpm – gallons per minute
*Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles.
**The maximum response distances for both L.A.F.D. fire suppression companies (engine and truck) must be satisfied.
LAMC Table 57.507.3.3.

According to LAMC Section 57.512.2[93], where a response distance is greater than that shown in Table 57.507.3.3 (table recreated above), all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief.

As shown in **Table XIV-2**, below, the Project Site is located 1.3 miles from Fire Station No. 93, which has a task force (composed of a truck company and engine company).[94] Therefore, the Project Site is located within the distance identified by LAMC Section 57.512.1[95] (i.e., within 1.5 mile for an engine and 2 miles for a truck).

Construction Impacts

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel

93 LAMC Section 57,512.2, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.2.

94 LAFD: http://www.lafd.org/about/about-lafd/apparatus.

95 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.

or driving in the lanes of opposing traffic. As construction activities are temporary in nature and emergency vehicles have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel and/or driving in opposing traffic lanes, construction of the Project would not impact LAFD services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives during construction of the Project.

Table XIV-2
Fire Station(s)

No.	Address	Distance	Equipment	Operational Response Time
93	19059 Ventura Blvd.	1.3 miles	Task Force Paramedic Ambulance Rescue Ambulance	EMS: 6:52 min Non-EMS: 6:29 min
Operational Response Time: Average time (turnout time + travel time) in the station area. Non-EMS is fire emergency. EMS is emergency medical service. Light Force: Truck company and single engine. Task Force: Truck company and two fire engines. Table: CAJA Environmental Services, July 2021.				

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts would be less than significant.

The Project would be constructed with automatic fire sprinkler systems and any additional fire protection as required by the LAFD Chief or the LAMC. Final fire flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project by LAFD during the plan check process. If the Project is determined to require one or more new hydrants during plan check in accordance with city standards, the Project would have to provide them.

For all the foregoing reasons, the Project would be adequately served by the LAFD.

Cumulative Impacts

Implementation of the related projects could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck

Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Valley Bureau, which oversees LAPD operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley areas.[96] The West Valley Community Police Station, located at 19020 Vanowen Street, is approximately 1.6 miles driving distance from the Project Site. The Valley Bureau service area is 226 square miles in size has approximately 1.8 million residents.[97]

There are no immediate plans to increase LAPD staffing or resources in those areas, which would serve the Project. The Project would not add any permanent residents to the area.

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open around its boundaries. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts would be less than significant.

Operational Impacts

96 LAPD, Valley Bureau: http://www.lapdonline.org/valley_bureau

97 LAPD: http://www.lapdonline.org/west_valley_community_police_station

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors. The potential for crime can be reduced with site-specific designs and features. The Project will include standard security measures such as adequate security lighting and secure key access to that offers a visual deterrent and human surveillance feature.

The LAPD will require that the commanding officer of the Community Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. The potential for crime can be reduced with site-specific designs and features. The Project would include standard security measures such as adequate security lighting, secure access to non-public areas and storage use access points. The LAPD will require that the commanding officer of the Station be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

Emergency access to the Project Site would be provided by the existing street system. The Project's direct minimal population increase and associated demand for police services, along with the provision of on-site security features, coordination with LAFD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Therefore, with mitigation, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

Implementation of the related projects could result in a net increase in the number of residents and employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

c. Schools?

Less Than Significant Impact. The Project includes development of the Project Site with storage facility building. The Project would not include development of any land uses that would generate school-aged children. Thus, the Project would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant

would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Cumulative Impacts

The related projects could result in an increase in the number students in the Project Site area. However, similar to the applicant of the proposed Project, the applicants of all the related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d. Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons).

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A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The Project includes demolition and removal of an existing surface parking area from the Project Site and development of the Site with a self-storage building and surface parking. The Project does not include any residential uses, and although it would generate a number of jobs, the increase in demand for park services will be negligible.

Cumulative Impacts

The related projects listed could result in an increase demand for parks and recreational services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of the related projects that consist of residential dwelling units would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any

significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

e. Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[98]

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area.

For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.

Cumulative Impacts

Implementation of the related projects could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

98 LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed in response to Checklist Question XV(d) (Public Services – Parks), Project impacts related to parks and recreational facilities would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, and such construction would have a significant adverse effect on the environment. While the increased employees and visitors may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees, if applicable, will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question XV(d) (Public Services – Parks). As discussed there, cumulative impacts related to parks and recreational facilities would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

This section is based on the following items, included as **Appendix H-1 and H-2** of this MND:

- LADOT Referral Form
- VMT Screening Evaluation, Gibson Transportation Consulting, July 27, 2021.

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

No Impact.

The following apply to the Project: Mobility Plan policies 2.3 through 2.7 and 2.10; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs PL.1 and PK.10; Transit Oriented Community Guidelines;

Vision Zero; and Citywide Design Guideline 2.[99] The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

Mobility Plan 2035

Policy 2.3 Pedestrian Infrastructure – 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.

While this is a citywide policy, the Project would support its implementation. Specifically, one of the primary objectives of the Project is to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include street trees around the Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network – Provide a slow speed network of locally serving streets.

This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

While this is a citywide policy, the Project would not conflict with its implementation. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. Therefore, the Project would not conflict with Mobility Plan Policy 2.5.

Policy 2.6 Bicycle Networks – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

While this is a citywide policy, the Project would support its implementation. Bicycle parking requirements per LAMC Section 12.21-A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Policy 2.7 Vehicle Network – Provide vehicular access to the regional freeway system.

99 Table 2.1-2 of the Transportation Assessment Guidelines specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.

This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, vehicular access to the Project Site would be provided by a two-way ingress and egress driveway on Oxnard Street. The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

Mobility Plan Programs PL.1 and PK.10

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be provided. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. While this is a citywide program, the Project would not conflict with its implementation. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

Citywide Design Guideline 2

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points, and a single driveway for vehicular access which would be located on Oxnard Street. Therefore, the Project would not conflict with Citywide Design Guideline 2.

Conclusion

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, no impact would occur.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

No Impact. This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. While Appendix G was revised to incorporate Section 15064.3, Section 15064.3 does not become applicable statewide until July 1, 2020. Until that time, pursuant to Section 15064.3(c), agencies are not required to use VMT as the basis for evaluation of traffic impacts and also may elect to use Section 15064.3 immediately.

The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (TAG) in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the Transportation Assessment Guidelines states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located.

Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it's located. Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT.

Per the TAG, a Transportation Assessment (TA) is required when a project is likely to add 250 or more daily vehicle trips to the local street system. This trip generation assessment has been conducted to determine if the Project would generate 250 or more net daily vehicle trips and would, thereby, require the preparation of a TA.

The City has updated the TAG to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. To assist in determining which development projects would conflict with CEQA Guidelines Section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate the requirement of further analysis of a land use project's impact based on VMT. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.

2. The project would generate a net increase in daily VMT.

Net Project Trip Generation Assessment.

Screening Analysis

Application of City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) showed that the Project is expected to generate a total of 221 net daily trips. As this is fewer than 368 net daily vehicle trips, a transportation assessment is not required. Further, the Project would not result in any significant VMT transportation impacts and no mitigation measures are required.

The VMT Calculator screening results are provided in **Appendix H-2** to this CE.

Peak Hour Generation

While the Project will not result in a significant transportation impact according to the VMT screening analysis, peak hour trip generation volumes are provided in Table 1 of **Appendix H-2** for informational purposes. As identified, after trip reduction credits for existing uses, the Project will generate a net reduction of 55 trips (45 inbound, 10 outbound) in the morning peak hour and a net reduction of 47 trips (13 inbound, 34 outbound) during the afternoon peak hour.

Project Transportation Impacts

Based on the analysis detailed above, the Project would not generate enough daily traffic to warrant a transportation assessment, would not result in VMT impacts, and would not generate enough peak hour traffic to create any operational impacts at the nearby intersections. For all the foregoing reasons, the Project would not have a significant traffic impact and satisfies the traffic requirement in CCR Section 15332(d) related to traffic.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). No impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction Impact

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. In coordination with LADOT, the Project will implement the following:

- Maintain access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Driveways

One new curb cut will be provided on Oxnard Street.

Driveway location and design will be subject to LADOT review, which will ensure that City standards regarding sight lines and turning movements are in compliance. Therefore, no impact would occur.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project will coordinate with LADOT on construction and best management practices, including but not limited to: install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety. Sidewalks will be closed adjacent to the Project Site and pedestrians will be directed across the streets at crosswalks prior to the Project Site. Sidewalk will be reopened as soon as reasonably feasible taking construction and construction staging into account. Therefore, impacts would be less than significant.

Pedestrian access to the Project would be provided at entrances along Oxnard Street for the ground floor main lobby entrance to the storage facility and related offices. The Project would not mix pedestrian and automobile traffic. Therefore, no impact would occur.

Other Hazards

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact would occur.

d. Result in inadequate emergency access?

Less Than Significant Impact. Prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Through compliance with existing City regulations, the Project would not result in any significant impacts related to emergency access.

Cumulative Impacts

Threshold T-1

Pursuant to the TAG, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects should be reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework. No cumulative impact has been identified with the Project that would preclude the City's implementation of any transportation related policies, programs, or standards. Therefore, cumulative impacts related to Threshold T-1 would be less than significant.

Threshold T-2

Cumulative VMT impacts are evaluated through a consistency check with SCAG's RTP/SCS, which is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. Per the City's TAG, projects that are consistent with the RTP/SCS in terms of development location and density are part of the regional solution for meeting air pollution and GHG emissions reduction goals. Projects that have less-than-significant VMT impact are deemed to be consistent with the SCAG's RTP/SCS and would have a less-than-significant cumulative impact on VMT. As discussed above, the Project's VMT would not exceed the City's South Valley APC VMT impact thresholds and as such, the Project's contribution to the cumulative VMT impact is adequate to demonstrate cumulative VMT impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

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

in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American tribes to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a request in writing to be notified of proposed projects. The tribe must respond in writing within 30 days of the City's AB 52 notice. The NAHC provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. An informational letter was mailed to a total of 10 tribes known to have resources in the Project Site area, on January 12, 2022, describing the Project and requesting any information regarding resources that may exist on or near the Project Site.

If a tribe does not request consultation in writing within 30 days of the date of the City's AB 52 Project Notice, then the City has met its requirements under AB 52, and no AB 52 consultation is required.

Two tribes, the Fernandeño Tataviam Band of Mission Indians, and the Gabrieleno Band of Mission Indians – Kizh Nation, responded stating that the Project Site is located within their ancestral affiliated homelands and requesting more information about the Project, including whether or not a California Historical Resources Information System / South Central Coastal Information Center (CHRIS/SCCIC) search was conducted.

A CHRIS/SCCIC search was conducted for the Project Site on February 16, 2022 and showed negative results; accordingly, the Fernandeño Tataviam Tribe requested that standard mitigation measures regarding the discovery and handling of any resources be implemented. Upon further examination of the Project, the Kizh Nation stated that as no subterranean construction is proposed, no further consultation would be necessary.

Based on the documentation/file search conducted and in the record and discussions with the relevant native tribes, there is a possibility that tribal cultural resources may be encountered during development of the project. Therefore, to mitigate any potential impacts, the following **Mitigation Measure MM-TRIBAL-1** for discovery and handling of any potential resources shall be implemented:

Requirements for consultation under CEQA have been satisfied.

Mitigation Measure

MM-TRIBAL-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall

cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project, and (2) Department of City Planning, Office of Historic Resources (OHR).

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken

to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. 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 and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Implementation of this mitigation measure will ensure that any potential tribal cultural resources encountered during development of the project are handled appropriately, which will minimize any potential impacts. Therefore, such impacts will be less than significant with mitigation incorporated.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. In addition, all other projects would be subject to separate environmental review as applicable, and other mitigation measures regarding discovery and handling of tribal resources would be implemented as necessary to mitigate any potential impacts. As such, the Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

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

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. As proposed, the existing building on the Project Site would be reused and expanded, however, the institutional use will not remain.

As shown on **Table XIX-1**, the Project would consume a net increase of approximately 4,058 gallons of water per day (or 0.004 mgd). It should be noted that this amount does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown on **Table XIX-1**.

Table XIX-1
Estimated Wastewater Generation and Water Consumption[1]

Land Use	Size	Water Consumption Rate[2]	Total (gallons/day)
Existing Uses to be Removed			
Commercial	47,124 sf	80 gpd/1,000 sf	3,770
		Total Existing	**3,770**
Proposed Uses			
Commercial	97,846 sf	80 gpd/1,000 sf	7,828
		Total Project	**7,828**
		Less Existing	3,770
		Net Total	**4,058**

sf = square feet gpd = gallons per day
1 Conservatively assumes that all water converts to wastewater.
2 Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the LADWP Water Service Organization to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project's demand for water. If a deficiency or service problem is discovered during the permitting process, the Project Applicant would be required to fund any necessary upgrades to adequately serve the Project. Water main and related infrastructure upgrades would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within public and private rights-of-way; and (3) the existing infrastructure would be replaced with new infrastructure in areas that have already been significantly disturbed.

For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects could result in an increased cumulative on water conveyance infrastructure. It should be noted that any amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption (and wastewater generation).

As with the Project, the applicants of the related projects would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirement for fire flow and other fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater Treatment

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd. Thus, there is approximately 175 mgd available capacity.

As identified on **Table XIX-1**, the Project would generate approximately 4,058 gallons of wastewater per day (or 0.004 mgd). With a remaining daily capacity of 175 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant. Pursuant to City policy, the Bureau of Sanitation would check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. A final approval for sewer capacity and connection permit would be made at the time of construction. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the related projects could increase the need for wastewater treatment. It should be noted that any amount does not take into account the net decrease in wastewater generation (and water consumption) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption

and wastewater generation. With a remaining treatment capacity of approximately 175 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage Facilities

As discussed in response to Checklist Question X(c)(iii), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electric Power Facilities

As discussed in response to Checklist Question VI(a), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Natural Gas Facilities

As discussed in response to Checklist Question VI(a), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Telecommunications Facilities

In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

All of the related projects would be located in a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing

infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

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

Less Than Significant Impact. The City receives water from five major sources: 1) the Eastern Sierra Nevada watershed, via the Los Angeles Aqueduct (LAA); 2) the Colorado River, via the Colorado River Aqueduct; 3) the Sacramento-San Joaquin Delta, via the State Water Project (SWP) and the California Aqueduct; 4) local groundwater; and 5) recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand.

As shown on **Table XIX-1**, the Project would consume a net increase of approximately 4,058 gallons of water per day. According to LADWP, any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.[100] As discussed previously, the Project is consistent with the City's General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180822 and in the City's Green Building Code to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

Cumulative Impacts

LADWP (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2040. In terms of the City's overall water supply condition, any related project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands. Similar to the Project, each related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA review process. The CEQA analysis would compare the existing to the proposed uses and the ability of LADWP supplies and infrastructure to provide a sufficient level of water service. Future development

[100] Los Angeles Department of Water and Power, Amir Tabakh, correspondence, February 11, 2015.

projects within the service area of the LADWP would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed in response to comment XIX(a), Project impacts related to wastewater treatment would be less than significant.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. As discussed below, Project impacts related to this issue would be less than significant.

Construction

Demolition and construction waste would be generated during the Project's construction phase. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. The Project's demolition and construction debris would primarily be classified as inert waste and would be recycled in accordance with the Citywide [Construction and Demolition] C&D Waste Recycling Ordinance, which requires all mixed C&D waste generated within City limits to be taken to a City-certified C&D waste processor for recycling, and with LAMC Section 66.32, which requires 70 percent of solid waste (including C&D debris) generated in the City to be recycled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that would guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor would utilize solid waste haulers, contractors, and recyclers who have obtained an AB 939 Compliance Permit (i.e., Waste Hauler Permit) from LASAN.

Furthermore, recycling facilities in the Los Angeles region (such as American Waste Transfer Station, Compton Recycling and Transfer Station, Carson Transfer Station and Materials Recovery Facility, Waste Resources Recovery, Falcon Refuse Center Inc., and the Southeast Resource Recovery Facility) would receive recyclable construction waste. Additional recycling facilities and inert waste landfills (which are able to accept fill dirt, concrete, glass, etc.) are listed in the City's Department of Sanitation's Construction and Demolition Recycling Guide and would be utilized as needed. For these reasons, the Project's construction and demolition activities would not require new or expanded landfill capacity. Therefore, the Project's construction-related impacts on solid waste would be less than significant.

Operation

The primary landfills that serve the City include Sunshine Canyon, Chiquita Canyon, Antelope Valley, Lancaster, and Calabasas. Permitted capacity and average daily disposal amounts for these landfills are shown on **Table XIX-2**. As shown, the combined remaining available daily intake at the landfills serving the City is approximately 21,798 tons.

Table XIX-2
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	19	65.3	12,100	7,012	5,088
Chiquita Canyon	29	59.8	12,000	2,307	9,693
Antelope Valley	22	12.0	3,600	1,677	1,923
Lancaster	23	10.2	3,000	376	2,624
Calabasas	11	4.9	3,500	1,030	2,470
				Total	**21,798**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019.

As shown on **Table XIX-3**, the Project would generate a net increase of approximately 0.127 tons of solid waste per day. With a remaining daily capacity of 21,798 tpd, the existing landfill capacity would be adequate to accommodate the Project's solid waste generation. For these reasons, Project operation would not require new or expanded landfill capacity. Therefore, Project impacts related to solid waste would be less than significant.

Table XIX-3
Estimated Solid Waste Generation

Land Use	Size	Generation Rate[1]	Total (tons/day)
Existing Uses to be Removed			
Commercial	47,124 sf	0.005 lbs/day/sf	0.117
		Total Existing	0.117
Proposed Uses			
Commercial	97,846 sf	0.005 lbs/day/sf	0.244
		Total Project	**0.244**
		Less Existing	0.117
		Net Total	**0.127**

lbs = pounds sf = square feet du = dwelling unit
[1] Source: CalRecyclewebsite: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm.
Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

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

No Impact. State regulation AB 939 required every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

The Project would be required to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance, the Curbside Recycling Program, and Zero Waste Plan, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

As with the Project, all of the related projects would be required by the City to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance, the Curbside Recycling Program, and Zero Waste Plan, and no impacts related to this issue would occur as a result of cumulative development.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur.

Cumulative Impacts

None of the related projects is located near lands that are classified as very high fire hazard severity zones. Therefore, no impacts related to this issue would occur as a result of cumulative development.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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

Less Than Significant with Mitigation Incorporated. As discussed under Checklist Topics IV (Biological Resources) the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal and V (Cultural Resources), or eliminate important examples of the major periods of California history or prehistory. As discussed under Checklist Topic XVIII (Tribal Cultural

Resources), with mitigation, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources.

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

Less Than Significant Impact. As discussed throughout this IS/MND, the Project's contribution to cumulative impacts would not be considerable.

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

Less Than Significant Impact. As discussed throughout this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings.