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

Mitigated Negative Declaration

21101 VENTURA BOULEVARD WOODLAND HILLS SELF-STORAGE PROJECT

Case Number: ENV-2022-8611-MND

Project Location: 21101 Ventura Boulevard, City of Los Angele, California 91364

Community Plan Area: Canoga Park – Winnetka – Woodland Hills – West Hills

Council District: 3, Council Member, Bob Blumenfield

Project Description: The Project includes the subdivision of one (1) lot into two (2) lots, minor improvements to an existing hotel on the site, which would include the reconfiguration of hotel parking areas, demolition of the existing hotel swimming pool, and construction, use, maintenance of a new pool and ancillary structures to the eastern portion of the hotel project site and a 112,204-square-foot self-storage building, 111,400 square feet of self-storage for household goods with an 804-square foot associated office and support space, and associated parking lot. The building would be six (6) stories tall (a maximum building height of 80 feet 4 inches). The Project would include 99 vehicle parking spaces for the hotel site and 29 parking spaces for the self-storage building site to be provided in surface parking lots located on the Project Site. Additionally, the Project would include 16 short-term bicycle parking spaces and 16 long-term bicycle parking spaces. A loading area in the self-storage building site would be located under the building. The 17 non-protected trees on the project site and one (1) street tree would be impacted/removed and replaced in accordance with the City's tree replacement requirements. The Project would require the grading of 1,600 cubic yards of soil and material during the grading phase (1,000 cubic yards cut and 600 cubic yards fill, net export of 400 cubic yards). The Applicant is seeking the following discretionary approvals from the City: 1) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C4-1LD to C4-2 and from P-1LD to C2-2; Pursuant to LAMC Section 11.5.7.F, Specific Plan Exceptions from the Ventura Cahuenga Boulevard Corridor Specific Plan for the self-storage site: a) an increase in height from 45 feet to 80 feet 4 inches; b) an increase in floor area ratio (FAR) from 1.25:1 to 3.54:1 (3.69:1 with dedication); and c) a reduction of the landscape buffer from 10 feet to five (5) feet pre dedication (zero feet with dedication); and for the hotel site: a) a reduction of landscape buffer from 10 feet to 3 feet pre dedication or zero feet with dedication, and b) reduction in required parking space from 134 to 99; 3) Pursuant to LAMC Section 11.5.7.C, a Specific Plan Project Compliance Review; 4) Pursuant to LAMC Section 12.24.W.50, a Conditional Use to allow for the development of a storage building for household goods within 500 feet of a residential use; 5) Pursuant to LAMC Section 12.24.S, a Conditional Use to allow up to 20 percent parking reduction otherwise required by the Code; and 6) Pursuant to LAMC Section 16.05, Site Plan Review for the development of a project resulting in a net increase of 50,000 square feet of nonresidential floor area.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	DUDEK 605 Third Street Encinitas, California 92024	Johnson Development Associates 101 N. Pacific Coast Hwy, Suite 308 El Segundo, CA 90245

MARCH 2024

Initial Study/Mitigated Negative Declaration

Woodland Hills Self-Storage 21101 Ventura Boulevard, City of Los Angeles, California

MARCH 2024

Prepared for:

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
6262 Van Nuys Boulevard Room 430
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
bgs	below ground surface
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of Los Angeles
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
COA	conditions of approval
CRHR	California Register of Historical Resources
dBA	A-weighted decibels
DR	demand response
DTSC	Department of the Toxic Substances Control
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
FAR	floor area ratio
FHWA	Federal Highway Administration
GHG	greenhouse gas
GWP	global warming potential
HAZNET	Hazardous Waste Manifest database
HQTA	High Quality Transit Area
HVAC	heating, ventilation, and air conditioning
HWRP	Hyperion Water Reclamation Plant
HWTS	Hazardous Waste Tracking System database
IS	Initial Study
ISO	International Organization for Standardization
ITE	Institute of Transportation Engineers

Acronym/Abbreviation	Definition
LADWP	Los Angeles Department of Water & Power
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LASAN	Los Angeles Bureau of Sanitation and Environment
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LID	low impact development
LOS	level of service
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MT	metric tons
MW	megawatts
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PDF	project design feature
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
project	JDA Woodland Hills Project
project applicant	Johnson Development Associates
RCNM	Roadway Construction Noise Model
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
Service	United States Fish and Wildlife Service
SLF	Sacred Lands File
SO_x	sulfur oxides
Specific Plan	Ventura-Cahuenga Boulevard Corridor Specific Plan
SRA	State Responsibility Area
SWPPP	stormwater pollution prevention plan

Acronym/Abbreviation	Definition
TAC	toxic air contaminant
TCR	tribal cultural resource
UWMP	Urban Water Management Plan
VCBCSP	Ventura Cahuenga Boulevard Corridor Specific Plan
VMT	vehicle miles traveled
VNY	Van Nuys Airport
VOC	volatile organic compound
WEAP	Workers Environmental Awareness Program

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1 Introduction

1.1 Project Overview

The City of Los Angeles (City) received an application from Johnson Development Associates (project applicant) requesting the following approvals for development of the JDA Woodland Hills Project (project) located at the southwest corner of Clarendon Street and Alhama Drive (21101 Ventura Boulevard) in Woodland Hills, California:

- Land Use - CPC-2022-8609-ZC-HD-SPE-SPP-CU-SPR
- Parcel Map - AA-2022-8610-PMLA
- CEQA - ENV-2022-8611-EAF

The project proposes the construction and operation of a self-storage facility on an approximately 2.51-acre property (77,022 square feet existing gross area, 74,757 square feet (2.42 acres) after 3-foot dedication on Alhama Drive and 5-foot dedication on Clarendon Street), located in the northern portion of the City. The project is sited on Assessor's Parcel Number [APN] 2167-001-010. The northern portion of the project site contains parking and the hotel's swimming pool (self-storage site), and the southern portion of the project site contains an existing hotel building and associated developments (hotel site). No changes to the hotel building itself are proposed as part of this project; changes are only proposed to be made to the parking and pool areas of the hotel site. The "project site" collectively refers to the "self-storage site" and the "hotel site" for purposes of the analysis within the IS/MND.

The Project proposes minor improvements to an existing hotel site, which would include the configuration of hotel parking areas, demolition of the existing hotel swimming pool, and construction, use, maintenance of a new pool and ancillary structures to the eastern portion of the hotel project site. The Project would construct a six-story, 112,204-square foot self-storage facility with loading areas, and surface parking. The above grade self-storage building would include a total of approximately 111,400 square feet of self-storage for household goods with an 804-square foot associated office and support space. The Project would include 99 vehicle parking spaces for the hotel site and 29 parking spaces for the self-storage building site to be provided in surface parking lots located in the Project Site. Additionally, the Project would include 16 short-term bicycle parking spaces and 16 long-term bicycle parking spaces. A loading area in the self-storage building site would be located under of the building. The 17 non-protected trees on the project site and one (1) street tree would be impacted/removed and replaced in accordance with the City's tree replacement requirements. The Project would require the grading of 1,600 cubic yards of soil and material during the grading phase (1,000 cubic yards cut and 600 cubic yards fill, net export of 400 cubic yards). Vehicular access to the entire project site would be provided by two (2) new driveways, one on Clarendon Street for access to the self-storage site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. Two existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site. The self-storage and hotel sites will share emergency access internally through secure gated access.

1.2 California Environmental Quality Act Compliance

The City is the lead California Environmental Quality Act (CEQA) agency responsible for the review and approval of the proposed project. Based on the findings of the Initial Study (IS), the City has made the determination that a Mitigated

Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA (California Public Resources Code, Section 21000 et seq.). As stated in CEQA Section 21064, an MND may be prepared for a project subject to CEQA when an IS has identified no potentially significant effects on the environment.

This draft IS/MND has been prepared by the City as lead agency and is in conformance with Section 15070(a) of the CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the MND and the IS Checklist is to determine any potentially significant impacts associated with the proposed project and to incorporate mitigation measures into the project design, as necessary, to reduce or eliminate the significant or potentially significant effects of the project.

1.3 Project Planning Setting

In accordance with CEQA, a good faith effort has been made during the preparation of this IS/MND to contact affected agencies, organizations, and persons who may have an interest in this project.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. The Draft IS/MND and related documents are available for review on City's website (https://planning.lacity.org/development-services/environmental-review/published-documents).

Comments on the IS/MND may be made in writing before the end of the public review period. Following the close of the public comment period, the City will consider this IS/MND and comments thereto in determining whether to approve the proposed project.

Written comments on the IS/MND should be sent to the following address by April 22, 2024.

City of Los Angeles
Planning Department
6262 Van Nuys Boulevard Room 430
Los Angeles, California 91401
Contact: Adrineh Melkonian
Email: Adrineh.melkonia@lacity.org

1.4 Public Review Process

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 4.1 through 4.21 include an explanation and discussion of each significance determination make in the checklist for the project.

For this IS/MND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact

4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

1.5. IS/MND Organization

This IS/MND is organized into six sections as follows:

Introduction

This Section provides and overview of the proposed Project, an overview of the CEQA process, description of the Project Setting, and an overview of the Public Review Process.

Executive Summary

This Section provides Project information, identifies environmental issues addressed in the Initial Study, and includes a determination whether the Project may have a significant effect on the environment.

Project Description

Provides a description of the location and environmental setting of the Project, details on Project characteristics, a list of discretionary actions, and description of related projects.

Initial Study Checklist

This section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project for each resource area.

References and Prepares

This Section provides a list of references used during the preparation of the IS/MND, and identifies the Lead Agency, the Project Applicant, and consultants/persons associated with preparation of the Initial Study

Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) describes the enforcement and monitoring agencies responsible for the implementation of the mitigation measures that have been incorporated into the Project. The mitigation measures that have been incorporated into the Project are listed by environmental topic.

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2 Executive Summary

Project Title	Woodland Hills Self-Storage Project
Environmental Case No.	CEQA - ENV-2022-8611-MND
Related Cases	Land Use - CPC-2022-8609-ZC-HD-SPE-SPP-CU-SPR Parcel Map - AA-2022-8610-PMLA

Project Location	21101 West Ventura Boulevard, Woodland Hills, California 91364
Community Plan Area	Canoga Park – Winnetka – Woodland Hills – West Hills
General Plan Designation	General Commercial
Specific Plan Land Use Designation	Community Commercial
Zoning	Commercial Use (C4-1LD) and Parking (P-1LD)
Council District	CD 3, Council Member, Bob Blumefield

Lead Agency	City of Los Angeles
Staff Contact	Adrineh Melkonian
Address	6262 Van Nuys Boulevard, Room 430 Van Nuys, California 91401
Phone Number	(213) 978-1301
Email	adrineh.melkonian@lacity.org

Applicant	Johnson Development Associates
Address	101 N. Pacific Coast Hwy, Suite 308 El Segundo, California 90245
Phone Number	(310) 204-3500 ext. 312

Project Summary

The project would include the construction of an approximately 112,204-square-feet (gross area, inclusive of self-storage, office space, and building support space), six-story self-storage building on an approximately 2.51-acre site (77,022 square feet existing gross area, 74,757 square feet (2.42 acres) after 3-foot dedication on Alhama Drive and 5-foot dedication on Clarendon Street), and the removal of the existing hotel pool and the construction of a new pool with ancillary facilities. The above grade self-storage building would include a total of approximately 111,400 square feet of self-storage of household goods space and 804 square feet of ground floor office and building support space. At the start of project construction, a new hotel pool area with ancillary buildings will be

constructed to the east of the existing hotel, along Alhama Drive. Once the new pool is operational, the existing hotel pool will be demolished and filled.

Vehicular access to the project site would be provided by two (2) new driveways, one on Clarendon Street for access to the self-storage site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. The two (2) existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site. The self-storage project site and hotel sites will share emergency access internally through secure gated access.

(For additional detail, see "Section 3 Project Description," below).

Environmental Setting

The project site is located at a 2.5-acre (gross) property located at the southwest corner of Clarendon Street and Alhama Drive, south of Clarendon Street, west of Alhama Drive, and north of Ventura Boulevard. The project's site consists of one parcel Assessor's Parcel Number [APN] 2167-001-010. The Project Site currently contains a hotel located in the southern half of the Project Site. The project site is located within a developed part of the City and is surrounded by a mix of commercial and residential land uses. Specific land uses in the immediate project area include the following:

- **North:** US-101 Freeway
- **East:** Commercial Uses
- **South:** Commercial and Residential uses
- **West:** Commercial Uses

(For additional detail, see "Section 3 Project Description," below).

Other Public Agencies Whose Approval is Required

No outside public agency approvals are required.

Mitigation Measures Identified for this Project

Cultural Resources

To ensure that the project would not result in any significant impacts related to cultural resource, the following mitigation measures would be implemented:

CUL-1: Workers Environmental Awareness Program Training. All construction personnel and monitors who are not trained archaeologists should be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet should be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker should also learn the proper procedures to follow in the event that cultural resources

or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor. To ensure consistency of the training with the City's standard conditions, a cultural resource inadvertent discovery clause should be included on all construction plans, and a copy kept on the Project site throughout the duration of all construction tasks.

CUL-2: Retention of a Qualified Archaeologist. A qualified archaeologist should be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities.

CUL-3: Inadvertent Discovery Clause. If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

Project development activities may resume once copies of the archaeological survey, study or report are submitted to the following:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, California 92834

Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Geology and Soils

To ensure that the project would not result in any significant impacts related to paleontological resources, the following mitigation measure would be implemented:

GEO-1 Discovery of Paleontological Resources. In the event that paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame,

and the extent to which any monitoring of earthmoving activities shall be required. 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.

Tribal Cultural Resources

To ensure that the project would not result in any significant impacts related to tribal cultural resource, the following mitigation measures would be implemented:

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the

Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-4: If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-footbuffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards, retained by the Project Applicant, 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 about 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, to provide Tribal input with regards to significance and treatment.

A. Should the find be deemed significant, as defined by CEQA (as amended, 2015), 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.

TCR-5: 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.

TCR-6: The City and/or Project Applicant shall, in good faith, consult with the Consulting Tribes on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities. The Consulting Tribes may retain all discovered TCRs in the form and/or manner the Consulting Tribes deems appropriate, at the Consulting Tribe' s sole discretion,

and for any purpose the Consulting Tribes deem appropriate, including for educational, cultural and/or historic purposes.

TCR-7: Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, and the County Coroner shall be contacted. If the human remains are determined to be Native American in origin by the County Coroner, the Project Applicant shall immediately notify the city and the NAHC in consultation with the consulting Tribes.

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

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3 Project Description

3.1 Project Location

The project site is located in the West San Fernando Valley within the City of Los Angeles. The project site is bound by the southwest corner of Clarendon Street and Alhama Drive, south of Clarendon Street, west of Alhama Drive, north of Ventura Boulevard, and east of Canoga Avenue. (Figure 1, Project Location Map).

The entire project site is comprised of Assessor's Parcel Number [APN] 2167-001-010. Regional access to the project area is provided by US-101 Freeway to the north and Topanga Canyon Boulevard to the west. The site is bounded to the north by US-101 Freeway, a car dealership to the west, commercial and residential uses to the south, and commercial uses to the east. The northern portion of the project site contains parking and the hotel's swimming pool (self-storage site) and the southern portion of the project site contains an existing hotel building and associated developments (hotel site). No changes to the hotel building itself are proposed as part of this project; changes are only proposed to be made to the parking and pool areas of the hotel site.

Vehicular access to the entire project site would be provided by two (2) new driveways, one on Clarendon Street for access to the self-storage site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. The two existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site. The self-storage project site and hotel sites will share emergency access internally through secure gated access.

3.2 Environmental Setting

Woodland Hills

Woodland Hills is a region of Los Angeles, California (City) within the southwestern region of San Fernando Valley with approximately 70,000 residents and approximately 15 square miles of territory. Within the City, the pattern of land use transitions from predominantly single, multi-family residential, suburban, and commercial zones near the US 101 Freeway to predominately single-family residential, commercial, service, and civic center uses to the north. The western areas of the Woodland Hills are mostly made up of planned development areas with various residential types, some agriculture, parks, and open space (Canoga Park – Winnetka – Woodland Hills – West Hills, Community Plan 1999)

Project Site

The approximately 2.5-acre rectangular-shaped project site is located on the southwest corner of Clarendon Street and Alhama Drive. The project site currently consists of a swimming pool and parking areas that would be repurposed during construction (Figure 2, Project Site)

The project site is relatively flat with an approximate elevation of approximately 902 feet above mean sea level. Soils on site consist of both fill soils and native soils. Fill soils are approximately five feet deep and are underlain by alluvium that ranges in depth from 10 to 53 feet below ground surface (bgs). The alluvium is underlain by claystone and siltstone bedrock.

The City's General Plan Land Use Map designates the site as General Commercial. The project site is within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan area as well as within the Ventura-Cahuenga Boulevard Corridor Specific Plan and has a land use of Community Commercial. The project site is zoned as P-1LD ((Automobile Parking Zone, Height District 1L, Development Limitations) and C4-1LD (Commercial Zone, Height District 1L, Development Limitations) [Figure 3 – Existing Land Use and Figure 4 – Existing Zoning].

Surrounding Land Uses

The project site is located within a developed part of the City and is surrounded by a mix of urbanized land uses. Specific land uses in the immediate project area are depicted in Table 1, Surrounding Land Uses.

Table 1. Surrounding Land Uses

Direction	Existing Use	General Plan	Zoning Designation
North	US-101 Freeway	Public Facilities	Public Facilities (PF-1XL)
East	Trader Joe's and a surface parking lot	General Commercial	Commercial ((T)(Q)C4-1LD) and Parking (P-1)
South	Commercial and Low-Density Residential Uses Residential Uses	General Commercial and Limited Commercial	Commercial (C4-1VLD) (CR-1VLD) and Two-Family (R2-1VL)
West	Car Dealership	General Commercial	Commercial (C4-1LD) and Parking (P-1LD)

The area to the west and east of the project site are commercial and parking uses; the area to the north of the project site includes Clarendon Street and the US-101 Freeway; and the area to the south includes Ventura Boulevard as well as commercial uses and low-density housing.

3.3 Project Characteristics

The project would include the subdivision of a lot into two (2) lots, construction of an approximately 112,204-square-feet (gross area, inclusive of self-storage, office space, and building support space), six-story self-storage building on an approximately 2.51-acre site (gross area) and the removal of the existing hotel pool and the construction of a new pool with ancillary facilities. The self-storage building would be composed of approximately 111,400 square feet of self-storage space with an 804 square foot ground floor office and building support space (Figure 5, Site Plan and Appendix H for specific details and drawings). The self-storage building would have an approximate height of 80 feet 4 inches when measured from grade to the top of the roof structure. Given that the City's Municipal Code allows for a maximum height of 45 feet in the C4-1LD and P-1LD Zone, however, a Zone Change and Height District Change to C2-2 is being requested for the entire project site to accommodate the project's use to include the self-storage of household goods (Figure 6, Proposed Zoning). Additionally, the project is located within the Ventura/Cahuenga Boulevard Corridor Specific Plan, which allows a maximum building height of 45 feet, a maximum floor area ratio (FAR) of 1.25:1, and requires a 10-foot landscape buffer where surface parking meets the street. The project would have a FAR of 3.54:1 (3.69:1 with dedication), a five (5) feet landscape buffer pre dedication (zero feet with dedication) along Clarendon Street, and a maximum height of 80 feet 4 inches from grade to the top of the roof structure. As such, the Project would require Specific Plan Exceptions pursuant to Section 11.5.7 F of the Los Angeles Municipal Code (LAMC) for this portion of the project.

At the start of project construction, a new hotel pool area with ancillary buildings will be constructed to the east of the existing hotel, along Alhama Drive. The new enclosed pool area will include a 17-foot by 32-foot pool, restrooms, a shower area, and pool equipment storage area. Once the new pool is operational, the existing hotel pool will be demolished and filled. In order to accommodate the new hotel pool area, the Project would provide three (3) feet landscaped buffer between the surface parking lot and the street before the dedication (zero feet after the dedication), in lieu of the required 10'-0" buffer area and 99 hotel parking stalls, pursuant to LAMC requirements, in lieu of the required 134 hotel parking spaces. As such, the Project would require Specific Plan Exceptions pursuant to Section 11.5.7 F of the LAMC for this portion of the project.

The project would require the subdivision of a lot into two (2) lots, issuance of a Conditional Use Permit (CUP), pursuant to LAMC Section 12.24 W.50 for a storage building for household goods in the C2 Zone within 500 feet of a R Zone. Additionally, in conjunction with the CUP, the Project would require approval of a 20 percent decrease in the amount of required parking pursuant to LAMC Section 12.24 S. Because the Project includes development of more than 50,000 gross square feet of non-residential floor area, a Site Plan Review would be required pursuant to LAMC Section 16.05.

Operational Characteristics

The project would support a variety of activities associated with the self-storage building, including the ingressing and egressing of passenger vehicles and trucks, the loading and unloading of trucks with designated truck courts/loading areas. In addition, the office space would support general internal office activities related to the self-storage uses.

The proposed Self-Storage Project's ground floor office space is intended to provide for the general office functions for the self-storage business, including leasing/rental transactions, property tours, move-in/out assistance, and other related services focused on self-storage customers, and include a restroom and break room for the self-storage employees. Additionally, the ground floor office space will include a retail component, consisting of merchandising displays containing packing supplies, cardboard boxes, and other storage/ moving related materials IE. Packing tape, cutting implements (box-cutters and scissors), bubble wrap, moving supplies, and other related items. These retail items will be offered for sale to the general public and be visible from the adjacent street to further activate the ground floor appearance from Alhama Drive.

On- and Off-Site Improvements

The project would also include improvements along the project's street frontage including landscaping. A variety of trees, shrubs, and groundcovers would be planted within the project frontage's landscape setback area, within the landscape areas found around the self-storage building. The Project would also include the development of a pool and associated improvements on a portion of the existing adjacent hotel's eastern parking lot to replace the pool that would be removed during project construction.

Site Access and Parking

Access to the self-storage facility is proposed from an existing driveway at the northwest corner of the site on Clarendon Street. An existing driveway at the northeast corner of the site on Clarendon Street is proposed to be removed.

The project would include a total of 29 parking spaces for the self-storage facility, including 20 standard parking stalls, nine (9) compact stalls, in addition to the two (2) required accessible stalls and 99 parking spaces for the hotel, including 61 standard parking stall, 38 compact stall, in addition to the five (5) accessible stalls. The self-

storage facility will include a total of 16 long-term and 16 short-term bicycle parking spaces. A summary of passenger vehicle parking required and provided by the project is provided in Table 2.

Table 2. Summary of Parking Stalls

	Number of Stalls
Self-Storage Facility	
Parking Required	
1st 10K 1/500 SF	20
10K Over 1/5,000 SF	20
Subtotal	*40*
20% CUP Reduction	-8
20% Bicycle Swap Reduction	-6
Total Parking Required	**26**
Parking Provided	
Standard	20
Compact	9
Total	*29*
Self-Storage Required Accessible	2
Self-Storage Provided Accessible	2
Total Parking Provided: Self-Storage	**29**
Hotel (122 Rooms Total)	
Parking Required per VCBCSP	
1 Space/Unit	122
1 Employee Space/10 Units	12
Total Parking Required per VCBCSP	**134**
Parking Required per LAMC Requirements	
1st 30 Guestrooms, 1 Space/Unit	30
2nd 30 Guestrooms, 0.5 Space/Unit	15
Remaining Guestrooms, 0.3 Space/Unit	23
Total Parking Required per LAMC	**68**
Parking Provided (per LAMC Requirements)	
Standard	61
Compact	38
Total	*99*
Hotel Required Accessible	4
Hotel Provided Accessible	5
Total Parking Provided: Hotel	**99**
Grand Total Parking Provided (Self-Storage and Hotel)	**128**

Source: Appendix H, Expanded Site Development Plans, Proposed Elevations, Materials Board, Renderings, and Landscape Plan

Utility Improvements

The project site is currently served by domestic water, sanitary sewer, electrical, natural gas, and telecommunication service. The project would connect to the existing facilities located on and in the immediate vicinity of the project site, as detailed in following sections.

Water

Domestic water would be provided to the project site by the Los Angeles Department of Water & Power (LADWP). The LADWP provides domestic water for the City and for portions of both the City and County of Los Angeles. Water service is provided for residential, commercial, industrial, governmental, and landscaping purposes (LADWP). Existing 8-inch water lines are within the public ROWs along Alhama Drive and Ventura Boulevard. The project would connect to the existing 12-inch water line within the public right-of-way (ROW) along Clarendon Street to supply the project site with domestic water, fire water, and irrigation water.

Sanitary Sewer

Los Angeles County's sewer system is maintained by the Los Angeles County Sanitation Districts. An existing 8" sewer pipe is located within the Public ROW along Ventura Boulevard and Alhama Drive. The project would connect to the existing sanitary sewer pipe along Alhama Drive.

Natural Gas and Electrical Service

The Southern California Gas Company would provide natural gas service to the project site while the Los Angeles Department of Water & Power would provide electric service. The project would connect to existing underground natural gas and electrical lines within the Public ROW surrounding the project site.

Storm Drainage

The project site would be proposing a two curb drains on the northwest and northeast portions of the project site. The runoff would discharge to the storm drain within Ventura Boulevard, and ultimately discharge to the Kelvin Channel, and into the Los Angeles River.

The project would involve the construction of a new engineered storm drain system to collect and treat on-site and off-site stormwater runoff. On-site stormwater will be collected via a series of roof drains, curbs, and gutters, and catch basins before being conveyed to one of the two proposed biofiltration planters located in the northwest and northeast corners of the project site. Each biofiltration planter would be connected to an overflow storm drain pipe that would connect to the curb drains.

3.4 Project Construction and Phasing

For the purpose of conservatively estimating project emissions, construction was modeled to last approximately 12 months and is shown in Table 3, below. The Project would require the grading of 1,600 cubic yards of soil and material during the grading phase (1,000 cubic yards cut and 600 cubic yards fill, net export of 400 cubic yards).

Table 3. Project Schedule by Phase

Phase	Schedule
Demolition	Month 1 (4 weeks)
Site Preparation	Month 2 (3 days)
Grading	Month 2 (1 week)
Building Construction	Month 2 through Month 11 (10 Months)
Paving	Month 11 (2 weeks)
Architectural Coatings	Month 12 (2 weeks)

Project Design Feature

The following project design feature (PDF) would be implemented as part of the project.

PDF-AIR-1: All architectural coatings applied on the exterior and interior of Project structures shall exceed compliance with South Coast Air Quality Management District Rule 1113 and have a volatile organic compound (VOC) content of 50 grams of VOC per liter of coating or less, less water and exempt compounds.

3.5 Project Approvals

The project has been assigned the following case numbers by the City:

- Land Use - CPC-2022-8609-ZC-HD-SPE-SPP-CU-SPR
- Parcel Map - AA-2022-8610-PMLA
- CEQA - ENV-2022-8611-MND

The actions and/or approvals associated with the above case numbers that the City needs to consider for the proposed project include, but are not limited to, the following. This list is preliminary, and may not be comprehensive:

Requested Entitlements

- Zone Change and Height District Change:
  - Pursuant to LAMC Section 12.32 Q, Zone Change and Height District Change from P-1LD and C4-1LD to C2-2;
- Project Permit Compliance:
  - Pursuant to LAMC Section 11.5.7 F, Specific Plan Exceptions from the Ventura/Cahuenga Boulevard Corridor Specific Plan, to allow the construction of a commercial building with:
  - Self-Storage Facility
    - 112,204 square feet of floor area in lieu of 40,819 square feet or a 3.54:1 FAR (3.69:1 with dedication) in lieu of a 1.25:1 FAR as permitted in Section 6.B.1.a;
    - 80 feet 4 inches in height in lieu of 45 feet as permitted in the Specific Plan Section 7.E 1.e.3; and,

  - 5 feet landscape buffer pre dedication or zero feet after dedication in lieu of 10 feet as permitted in the Specific Plan Section 7.D 1.b;
- Hotel (Existing)
  - 3 feet landscape buffer pre dedication or zero feet after dedication in lieu of 10 feet as permitted in the Specific Plan Section 7.D 1.b; and,
  - 99 parking spaces in lieu of 134 parking spaces as permitted in the Specific Plan Section 7.F.1.d;
- Pursuant to LAMC Section 11.5.7 C and Section 9 of the Ventura/Cahuenga Boulevard Corridor Specific Plan, a Specific Plan Project Permit Compliance Review to permit the construction of a commercial building with an associated office and retail spaces;

- Conditional Use Permit:
  - Pursuant to LAMC Section 12.24 W.50, to allow for the development of a storage building for household goods within 500 feet of a residential use; and,
  - Pursuant to LAMC Section 12.24 S, to allow up to 20 percent parking reduction otherwise required by the Code.
- Site Plan Review:
  - Pursuant to LAMC Section 16.05, a Site Plan Review for a development project resulting in a net increase of 50,000 square feet of nonresidential floor area; and,
- Preliminary Parcel Map:
  - Pursuant to LAMC 17.50, a Preliminary Parcel Map for the subdivision of One (1) lot into two (2) lots.

Subsequent non-discretionary approvals (which would require separate processing through the City) would include, but may not be limited to, a demolition permit, grading permit, building permits, and occupancy permits.

3.6 Related Projects

CEQA Guidelines Section 15130 requires a consideration of the environmental effects of a proposed project individually, as well as cumulatively. As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individuals effects, which, when considered together, are considerable or which compound or increase other environmental impacts.

CEQA Guidelines Section 15130(b) states that complying with one of the following two protocols is necessary to provide an adequate discussion of significant cumulative impacts:

> *(A) A list of past, present, and probable futures projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency; or*
>
> *(B) A summary of projections contained in an adopted local, regional, statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projects may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.*

As part of this analysis, the City's Los Angeles Department of Transportation (LADOT) was asked about Related Projects in the Project area. LADOT provided a list of Related Projects within 1-mile of the Project Site which were subsequently reviewed by the City's Planning Department. A total of three (3) Related Projects were used to evaluate cumulative impacts and are summarized in Table 4, below.

Table 4 Related Projects Within 1 Mile of Project Site

#	Address	Distance to Site	Use	Size
1	5955 N De Soto Avenue	0.8	Mixed-Use	—
2	5601 N De Soto Avenue	0.8	Other	45,290
3	20539 W Ventura Boulevard	0.8	Other	80,900

Sources: Crisostomo, Miguel. City of Los Angeles. Email communication 11/23/2023
Melkonian, Adrineh. City of Los Angeles. Email communication 12/6/2023

4 Initial Study Checklist

1. **Project title:**

   Woodland Hills Self-Storage Project

2. **Lead agency name and address:**

   City of Los Angeles Planning Department
   6262 Van Nuys Boulevard Room 430
   Los Angeles, California 91401

3. **Contact person and phone number:**

   City Planner
   Adrineh Melkonian
   Adrineh.melkonia@lacity.org
   213.978.1301

   Senior City Planner
   Jojo Pewsawang
   Jojo.pewsawang@lacity.org
   213.978.1214

4. **Project location:**

   The project site is located at a 2.51-acre (77,022 square feet existing gross area, 74,757 square feet (2.42 acres) after 3-foot dedication on Alhama Drive and 5-foot dedication on Clarendon Street) property located at the southwest corner of Clarendon Street and Alhama Drive, south of Clarendon Street, west of Alhama Drive, and north of Ventura Boulevard. The project's site consists of one parcel Assessor's Parcel Number [APN] 2167-001-010. The Project Site currently contains a hotel located in the southern half of the Project Site.

5. **Project sponsor's name and address:**

   Johnson Development Associates
   101 N. Pacific Coast Hwy, Suite 308
   El Segundo, California 90245

6. **General plan Land use designation - Specific Plan Land use designation:**

   General Commercial – Community Commercial

7. **Zoning:**

   Commercial Use (C4-1LD) and Parking (P-1LD)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

The project proposes the construction and operation of a self-storage facility on an approximately 2.51-acre (gross) property (77,022 square feet existing gross area, 74,757 square feet (2.42 acres) after 3-foot dedication on Alhama Drive and 5-foot dedication on Clarendon Street). The project would include the construction of an approximately 112,204-square-feet (gross area, inclusive of self-storage, office space, and building support space), six-story self-storage building and the removal of the existing hotel pool and the construction of a new pool with ancillary facilities. The above grade self-storage building would include a total of approximately 111,400 square feet of self-storage of household goods space with an 804-square foot ground floor office and building support space. At the start of project construction, a new hotel pool area with ancillary buildings will be constructed to the east of the existing hotel, along Alhama Drive. Once the new pool is operational, the existing hotel pool will be demolished and filled.

Vehicular access to the project site would be provided by two (2) new driveways, one on Clarendon Street for access to the self-storage site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. The two (2) existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site. The self-storage project site and hotel siteFs will share emergency access internally through secure gated access.

9. **Surrounding land uses and setting: Briefly describe the project's surroundings:**

The project site is located within a developed part of the City and is surrounded by a mix of commercial and residential land uses. Specific land uses in the immediate project area include the following:

- **North:** US-101 Freeway
- **East:** Commercial Uses
- **South:** Commercial and Residential uses
- **West:** Commercial Uses

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

No outside public agency approvals are required.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Please refer to Section 4.5, Cultural Resources, and 4.18, Tribal Cultural Resources, of this IS/MND.

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	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ 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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that 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 the 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

	March 21, 2024
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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "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.
5. Earlier analyses may 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 1506l)(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 source 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 whatever 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

4.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS** – 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 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?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact**.** Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, and coastlines. The project site is located within in an area with generally flat terrain. Major scenic vistas that are visible from the project site are the Santa Monica Mountains and the San Fernando Valley ranges. The Santa Monica Mountains are located approximately 1.6 miles southwest of the Project site. The San Fernando Valley ranges are approximately 5 miles from the Project site. The City of Los Angeles Canoga Park-Winnetka-Woodland Hills-West Hills' Community Plan aims to preserve the views of the San Fernando Valley and has named the Warner Center the gateway to the San Fernando Valley, which is approximately one-mile from the Project site. (City of Los Angeles 1999) Based on these distances, as well as the presence of existing intervening natural topographical variations and human-made urban features, the project site is not located within the direct viewshed of these scenic vistas. Overall, the project site is located well outside the viewshed of any scenic vistas or other important visual resources. Therefore, no impacts associated with scenic vistas would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. Scenic highways and routes are a unique component of the circulation system, as they traverse areas of unusual scenic or aesthetic value. According to the California Department of Transportation, the only "Officially Designated State Scenic Highway" in Los Angeles County is the segment of Mulholland HWY-FR RTE 1 (LA 27 1) (Topanga Canyon State Scenic Highway) located approximately between Mulholland HWY-FR RTE 1 to Kanan Dume Road and W Cornell Road to Los Virgenes Road is roughly 1.9 miles southwest of the project site. Additionally, several other roads within Los Angeles County are designated as "Eligible State Scenic Highways" (i.e., Topanga Canyon Boulevard Route 27 (LA 101), located approximately 1.4 miles west of the Project site. (Caltrans 2018) However, due to natural topographical variations and intervening development, the Project Site is not directly visible from LA 101 and LA 27 1. Therefore, no impacts associated with state scenic highways would occur.

c) In non-urbanized areas, would the project 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?

Less-than-Significant Impact. Visual character describes the aesthetic setting of a project area. The project is located within an urbanized area of the City and is surrounded by similar commercial uses. Section 20171 of the California Public Resources Code defines an "urbanized area" as "an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." The project site is located in the City of Los Angeles, which has a population of approximately 3.8 million (U.S. Census Bureau 2021). Therefore, the project is located in an urban area and the following analysis considers whether the project would conflict with applicable zoning or other regulations governing scenic quality.

The project would involve the development of a six-story self-storage facility that would have a maximum height of 80 feet 4 inches from grade to the top of the roof structure. Under existing conditions, the project site is located in an area zoned as C4-1LD Commercial and P-1LD (Parking), which allows for a maximum building height of 45 feet. Thus, a Zone Change and Height District Change would be required to rezone the project site to C2-2 Commercial. The proposed Zone Change and Height District Change would increase the maximum allowable building height to 80 feet 4 inches to accommodate the proposed six-story building.

The project site is also located within the Ventura-Cahuenga Boulevard Corridor Specific Plan. This specific plan establishes requirements for development within its area, including a maximum building height of 45 feet for buildings on the northside of Ventura Boulevard, a landscaped buffer of 10 feet around any surface parking lot adjacent to streets, and a maximum FAR of 1.25:1. As such, the project would require the approval of specific plan exceptions to allow for a maximum building height of 80 feet 4 inches and a five (5) feet landscape buffer pre dedication (zero feet with dedication) along Clarendon Street on the self-storage facility and a 3-foot buffer pre dedication and zero feet after the dedication between the surface parking lot of the hotel and the street in lieu of the required 10 foot buffer, and to increase in the maximum FAR to 3.54:1 (3.69:1 after dedication) in lieu of the existing 1.25:1 FAR.

The project site is located in a commercial area that contains other structures of similar height, mass, and scale as the proposed development, including a six-story hotel building that would be located adjacent to the proposed project. The project would also be subject to a Site Plan Review prior to the issuance of any grading or building permits. Further, the project would be consistent with the applicable elements of the City's General Plan, Canoga Park-Winnetka-Woodland Hills Community Plan, Ventura-Cahuenga Boulevard Corridor Specific Plan, and LAMC provisions. Views of utilitarian project components, such as loading areas and mechanical equipment, would be screen from public view to the maximum extent practicable through project's design. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be **less than significant.**

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less-than-Significant Impact. Lighting is of most concern when it may spill over or trespass from a project site onto sensitive surrounding land uses resulting in a potential nuisance. The project, however, is located in a commercial area and is surrounded by similar commercial developments. Existing sources of nighttime light includes streetlights, parking lot lights, exterior building lights, business identification signs, vehicle headlights and light emanating from windows from commercial developments. The project would include lighting features similar to those used in surrounding developments. Given the urban nature of the area and existing sources of lighting and glare, any incremental increases from the project would be less than significant. The project would also comply with all applicable City and County of Los Angeles standards regarding light and glare. Furthermore, the project would not propose any features that would be characterized as creating a substantial new source of glare that would adversely affect daytime or nighttime views in the area. Therefore, impacts associated with light and glare would be **less than significant.**

Cumulative Impacts

The proposed project is located outside of the viewshed of any scenic vistas or other important visual resources, including scenic highways. Similar to the proposed Project, the three (3) related projects would be subject to the Citywide Design Guidelines and would be required to comply with all applicable design standards. All three (3) related projects are infill development in a highly urbanized area and would not increase the potential for significant amounts of light and glare. As such, no cumulative impacts to aesthetics would occur.

4.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Dept. 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. 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) ***Would the project 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. The project site currently consists of a hotel, parking, swimming pool, and is not used for agricultural purposes. The General Plan designates the land use at the site as General Commercial and the City's Zoning Map identifies the site as Commercial (C4-1LD) and Automobile Parking (P-1LD) (City of Los Angeles 2001). According to the California Department of Conservation Important Farmland Finder (CDOC 2022a), the project site is identified as "Urban and Built-Up Land". The project site does not contain

Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Important Farmland"). The project would not occur within any farmland locations and would not result in the conversion of Prime or Unique Farmland or Farmland of Statewide Importance. Therefore, no impacts associated with the conversion of Important Farmland would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. Refer to Section 4.2(a). As stated above, the project site is not zoned for agricultural use, and the site is not under Williamson Act Contract. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract and no impacts would occur.

c) Would the project 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. Refer to Section 4.2(a). The project site is zoned as Commercial (C4-1LD) and Automobile Parking (P-1D) and is located within a developed area. There are no areas zoned for forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Section 4.2(c). The proposed project would not involve the conversion of forest land to non-forest use. Therefore, no impact with forest land would occur.

e) Would the project 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. Refer to Section 4.2(a). The project site is zoned as Commercial and is located within a developed area. Further, no off-site improvement associated with the project would result in changes to other properties designated as Farmland or forest land. There are no areas zoned for agricultural use or identified as forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

Cumulative Impacts

Neither the Project site nor the three (3) related projects are on land that is used for, or designated as, agricultural or forest land. Therefore, no cumulative impacts related to agriculture and forestry resources would occur.

4.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. 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 information and analysis presented below are based primarily on the following (refer to Appendix A):

- California Emissions Estimator Model (CalEEMod) Outputs, prepared by Dudek, December 2022

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less-than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for SCAB is the 2022 AQMP (SCAQMD 2022). The 2016 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard (SCAQMD 2022).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining

consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 4.3(b). Detailed results of this analysis are included in Appendix A. As presented in Section 4.3(b), the project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the project would therefore be consistent with Criterion No. 1. The second criterion regarding the potential of the project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by SCAG for its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2020). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2022).[1] The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2020 AQMP is generally consistent with local government plans.

The City's General Plan Land Use Map designates the site as General Commercial. The project site is zoned as parking, while Commercial. Therefore, the project would be consistent with the existing zoning of the project site and does not propose a change in land use designation. As such, since the proposed project is not anticipated to result in residential population growth or generate an increase in employment that would conflict with existing employment-population projections, it would not conflict with or exceed the assumptions in the 2022 AQMP. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in development of the SCAQMD AQMP.

The Air Quality Element of the General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals.

[1] Information necessary to produce the emissions inventory for SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2020–2045 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

To achieve these goals, performance-based standards have been adopted to provide flexibility in implementation of the policies and objectives of the Air Quality Element. The Air Quality Element goals, objectives, and policies relevant to the Project are summarized in the Local Regulatory Framework section above.

The proposed project would promote the General Plan Air Quality Element goals, objectives, and policies. The project would also be located in within an already developed parcel within the dense Ventura Boulevard Corridor would provide neighborhood serving self-storage amenities to nearby residences and businesses. By locating the project near other business and residences the proposed project would help enable a reduction in VMT and associated petroleum demand. Thus, the proposed project would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

b) Would the project 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. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[2] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2019; EPA 2020a). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards,

[2] An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the EPA and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[3]

The project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in March 2023, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 4.3-1 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2023).

Table 4.3-1. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (Pounds per Day)**	**Operation (Pounds per Day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2023.
Notes: VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.
GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the GHG emissions analysis and not the air quality analysis.

[a] The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

The project would result in a cumulatively considerable net increase for O_3, which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 4.3-1. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e.,

[3] Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

VOCs and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from construction and operation of the project, with the exception of operational mobile source emissions.[4] The following discussion quantitatively evaluates project-generated construction and operational emissions and impacts that would result from implementation of the project.

Construction Emissions

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Emissions from the construction phase of the project were estimated using CalEEMod default values. For the purpose of conservatively estimating project emissions, construction was modeled beginning in June 2023 and concluding in June 2024[5] and lasting approximately 12 months. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- Demolition: 4 weeks (Month 1)
- Site preparation: 3 days (Month 2)
- Grading: 1 week (Month 2)
- Building construction: 10 months (Month 2 through Month 11)
- Paving: 2 weeks (Month 11)
- Application of architectural coatings: 2 weeks (Month 12)

Construction modeling assumptions for equipment and vehicles are provided in Table 4.3-2. Equipment mix and horsepower were based on CalEEMod default values, including equipment load factor. The project would require that 400 cubic yards of earthwork material be exported during the construction grading phase. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site 5 days per week.

[4] CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including warehouses.

[5] The analysis assumes a construction start date of July 2023, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG 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.

Table 4.3-2. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Demolition	14	4	0	Concrete/Industrial Saws	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	2	8
Site Preparation	8	4	0	Graders	1	8
				Scrapers	1	8
				Tractors/Loaders/Backhoes	1	7
Grading	10	4	56	Graders	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	2	7
Building Construction	54	22	0	Cranes	1	8
				Forklifts	2	7
				Generator Sets	1	8
				Tractors/Loaders/Backhoes	1	6
				Welders	3	8
Paving	16	0	0	Cement and Morar Mixers	1	8
				Pavers	1	8
				Paving Equipment	1	8
				Rollers	2	8
				Tractors/Loaders/Backhoes	1	8
Architectural Coating	12	0	0	Air Compressors	1	6

Emissions generated during construction (and operation) of the project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust, requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites would be watered at least two times daily in compliance with requirements of SCAQMD standard dust control measures in Rule 403. The application of architectural coatings, such as exterior/interior paint and other finishes, and the application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings that comply with the requirements of SCAQMD's Rule 1113, Architectural Coatings.[6]

Table 4.3-3 shows the estimated maximum daily construction emissions associated with the construction phase of the project.

[6] SCAQMD Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Table 4.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
2023	1.91	15.82	16.42	0.03	4.11	2.19
2024	52.41	13.73	16.42	0.03	0.20	0.72
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SCAQMD Rule 403.

As shown in Table 4.3-3, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction, and short-term construction impacts would be less than significant.

Operational Emissions

Emissions from the operational phase of the project and operation of existing land uses were estimated using CalEEMod. Operational year 2025 was assumed following completion of construction.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2017). Consumer product VOC emissions were estimated in CalEEMod based on the floor area of buildings and default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings, such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from the application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emissions factor is based on the VOC content of the surface coatings, and SCAQMD's Rule 1113, Architectural Coatings, governs the VOC content for interior and exterior coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SCAQMD 2016). CalEEMod

default values were assumed, including the surface area to be painted, the VOC content of architectural coatings, and the reapplication rate of 10% of area per year.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use were estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases (GHGs) in CalEEMod, since criteria pollutant emissions occur at the power plant, which is typically off site.

Mobile Sources

Following the completion of construction activities, the Project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of employees and visitors. CalEEMod default data, including temperature, trip length, trip characteristics, and emissions factors, were conservatively used for the model inputs. Project-related traffic was assumed to include a mixture of vehicles in accordance with the associated use, as modeled within CalEEMod, which is based on the California Air Resources Board (CARB) EMFAC2017 model. Emission factors representing the vehicle mix and emissions for 2025 were used to estimate emissions associated with vehicular sources. The ITE Trip Generation, 11th edition was used to estimate trip rates for the project using the min-warehouse 151 land use.

Table 4.3-4 presents the maximum daily emissions associated with operation of the project in 2025 at buildout. The values shown are the maximum summer and winter daily emissions results from CalEEMod. Complete details of the emissions calculations are provided in Appendix A.

Table 4.3-4. Estimated Maximum Daily Operation Criteria Air Pollutant Emissions

Emissions Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	2.51	<0.01	0.01	0.00	<0.01	<0.01
Energy	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Mobile	0.63	0.70	6.83	0.02	1.78	0.48
Total	**3.15**	**0.73**	**6.86**	**0.02**	**1.77**	**0.48**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; <0.01 = reported value less than 0.01.
See Appendix A for complete results.

As shown in Table 4.3-4, maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ generated by the project would not exceed the SCAQMD's significance thresholds, and long-term operational impacts would be less than significant.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. However, as indicated in Tables 4.3-3 and 4.3-4, project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.[7] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD. Additionally, cumulative VOC emissions would be reduced because all future projects would be subject VOC content of the surface coatings, SCAQMD's Rule 1113, Architectural Coatings, governs the VOC content for interior and exterior coatings.

Therefore, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less-than-Significant Impact. The project would not expose sensitive receptors to substantial pollutant concentrations, as evaluated below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include sites such as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors are residential uses located approximately 300 feet southwest of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). The project is located within Source-Receptor Area 2 (Northwest

[7] The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

Costal LA County). This analysis applies the SCAQMD LST values for a 2-acre site within Source-Receptor Area 2 with a receptor distance of 50 meters (164 feet).

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Trucks and worker trips associated with the project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Off-site emissions from truck trips were limited to 1,000 feet of estimated on-site activity within the LST analysis. The maximum daily on-site emissions generated by construction of the project in each construction year are presented in Table 4.3-5 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 34 to determine whether project-generated on-site emissions would result in potential LST impacts.

Table 4.3-5. Construction Localized Significance Thresholds Analysis

	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)			
Maximum	15.82	16.42	4.11	2.19
SCAQMD LST Criteria[a]	*143*	*1,213*	*19*	*5*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2009; Appendix A.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
[a] LST are shown for a 2-acre disturbed area corresponding to a distance to a sensitive receptor of 50 meters in Source-Receptor Area 2 (Northwest Coastal LA County).

As shown in Table 4.3-5, proposed construction activities would not generate emissions more than site-specific LSTs for NO_x, CO, PM_{10} and $PM_{2.5}$. Thus, impacts would be **less than significant**.

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. As discussed in Section 4.17, As the proposed project is forecast to generate 24 AM peak hour trips and 24 PM peak hour trips (PCE-adjusted). Based on the project's trip generation estimates as described above, development of the proposed project would not be likely to result

in degradation of the nearby CMP facilities due to the low volume of vehicular traffic (less than 250 peak hour trips, and less than 50 peak hour trips to a State highway facility, per the CMP.

In addition, at the time that the SCAQMD Handbook (SCAQMD 1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[8] (SCAQMD 2003b) for the four worst-case intersections in the SCAB:

1. Wilshire Boulevard and Veteran Avenue
2. Sunset Boulevard and Highland Avenue
3. La Cienega Boulevard and Century Boulevard
4. Long Beach Boulevard and Imperial Highway

At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 parts per million at the Sunset Boulevard and Highland Avenue intersection in 2002 and the maximum 8-hour CO concentration was 3.4 parts per million at the Wilshire Boulevard and Veteran Avenue in 2002.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the project is not anticipated to increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur.

Based on these considerations, the project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. This conclusion is supported by the analysis in Section 4.17, which demonstrates that traffic impacts would be less than significant. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute (immediate) and/or chronic (cumulative) non-cancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

[8] SCAQMD's CO hotspot modeling guidance has not changed since 2003.

TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Project construction would result in emissions of diesel particulate from heavy construction equipment and trucks accessing the site. Diesel particulate is characterized as a TAC by the State of California. The Office of Environmental Health Hazard Assessment (OEHHA) has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure, but has not identified health effects due to short-term exposure to diesel exhaust. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/ duration of activities associated with the Project (OEHHA 2015). Thus, the duration of the proposed construction activities would only constitute a small percentage of the total 30-year exposure period. Thus, the duration of proposed construction activities (approximately 12 months) would only constitute a small percentage of the total long-term exposure period and would not result in exposure of proximate sensitive receptors to substantial TACs.

Health Effects of Criteria Air Pollutants

Construction and operation of the project would generate criteria air pollutant emissions; however, estimated construction and operational emissions would not exceed the SCAQMD mass-emission daily thresholds as shown in Tables 4.3-3 and 4.3-4, respectively. As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2021). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Because construction and operation of the project would not result in O_3 precursor emissions (i.e., VOCs or NO_X) that would exceed

the SCAQMD thresholds, as shown in Tables 4.3-3 and 4.3-4, the project is not anticipated to substantially contribute to regional O_3 concentrations and their associated health impacts.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2021). Construction and operation of the project would not generate NO_x emissions that would exceed the SCAQMD mass daily thresholds; therefore, construction and operation of the project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 or contribute to associated health effects. In addition, the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2, and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2021). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less-than-significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} and $PM_{2.5}$ include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). As with O_3 and NO_X, and as shown in Tables 4.3-3 and 4.3- 4, the project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related health effects for this pollutant.

In summary, construction and operation of the project would not result in exceedances of the SCAQMD significance thresholds for certain criteria pollutants, and potential health effects associated with criteria air pollutants 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?

Less-than-Significant Impact. The project would result in emissions, including criteria air pollutant and TACs; however, those are addressed under Sections 4.3(b) and 4.3(c). Accordingly, the evaluation of other emissions is focused on the potential for the project to generate odors. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; the wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project entails operation of a self-

storage facility for household goods and would not create any new sources of odors during operation. Therefore, project operations would result in an odor impact that is less than significant.

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Cumulative Impacts

As detailed above, the proposed Project would not exceed the SCQAMD's regional or localized significance thresholds. It is largely speculative at this time to determine whether the proposed Project would overlap with the three (3) Related Projects. However, all projects, including the proposed Project, would be subject to the SCAQMD rules and regulations to limit fugitive dust and other emissions. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – 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 U.S. 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 information and analysis presented below are based primarily on the following (refer to Appendix B):

- Arborist Report, prepared by Dudek, December 2022.

a) Would the project 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 proposed Project site is an existing parking lot, pool, and landscaped area adjacent to a hotel building. Landscaped areas include grass and ornamental trees and shrubs. The site is surrounded by the US-101 Freeway to the north, and commercial development to the west, east, and south. According to the arborist investigation conducted for the site (Dudek 2022), there are 36 trees within the Project site portion of the survey area, and eight (8) that occur within the public right-of-way portion of the survey area. None of the inventoried trees are of protected status, as defined by the City's Protected Tree Ordinance no. 186,873. The eight (8) trees located in the public right-of-way are regulated by the City's Municipal Code Chapter VI, Article 2, Section 62.161 et seq.

The proposed Project is anticipated to result in the removal of 16 trees and the encroachment of two (2) trees on the Project site, as well as the removal of one (1) tree located within the public right-of-way. Since none of the trees located on the Project site are protected, their removals would not require mitigation efforts. The two (2) trees that would be encroached upon would be protected during construction through the implementation of protection measures outlined in the Arborist Report (Appendix B), which include exclusion fencing, worker training to avoid direct impacts, irrigation, and monthly arborist inspections to promote long-term health. Additionally, the proposed removal of a street tree would require that an Application for a Tree Removal Permit be submitted to the City. The City would also require that the street tree be replace at a 1:1 ratio with 48-inch box or larger trees.

The Project site does not support any naturally vegetated areas or connectivity to any habitats for candidate, sensitive, or special status species under existing conditions, nor is the Project site adjacent to any open space that may support such species.

The existence of ornamental trees could provide nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (MBTA) (16 USC 703-712) and the California Fish and Game Code Section 3503, 3503.5, and 3513. The Migratory Bird Treaty Act (1918) prohibits tree removal and potentially disturbing construction activities from occurring during certain time periods to avoid harassment of nesting birds. According to the Migratory Bird Treaty Act, no construction or other disturbing activities can occur within 300 feet of an active bird nest (500 feet for listed species) during a period typically beginning in February and ending in September each year. The project would comply with the regulations of the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (Service).

Once the proposed project has been constructed, construction-related disturbances would not occur, and landscaping trees would remain on site. Overall, the proposed project would have less than significant impact on the movement of native resident or migratory fish or wildlife species and established native resident or migratory wildlife corridors, and would not impede the use of native wildlife nursery sites and no mitigation would be required.

b) Would the project 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?

Less Than Significant Impact. There are no riparian habitat communities or other sensitive natural communities located on the Project site, which is fully developed with urban uses and ornamental landscaping. Demolition and construction activities at the Project site have the potential to release small amounts of construction debris or sediment into the storm drain system. However, the implementation of construction Best Management Practices (BMPs) as described in Section 4.10, Hydrology and Water Quality, would reduce impacts associated with water quality and waste discharge to a less-than-significant level. As such, the proposed Project would have a less than significant impacts on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or Service, and no mitigation is required.

c) Would the project 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?

Less Than Significant Impact. There are no wetlands on the Project site, which is fully developed with urban uses and ornamental landscaping. As previously mentioned, demolition and construction activities at the Project site have the potential to release small amounts of construction debris or sediment into the storm drain system. The implementation of construction BMPs as described in Section 4.10, Hydrology and Water Quality, however, would reduce these impacts to a less-than-significant level. As such, the Project would have a less than significant impact on state and federally protected wetlands, and no mitigation is required.

d) Would the project 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?

Less Than Significant Impact. The Project site is located in a fully developed, urban area surrounded by urban land uses, the presence of which precludes native wildlife movement in the direction of the Project site. Additionally, there are not wetlands or water bodies within the Project site. As such, the proposed Project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

There are several trees on the Project site, however, that would have the potential to provide nesting sites for birds and raptors that are protected under the MBTA (16 USC 703-712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. As discussed in Section 4.4(a), above, the proposed project would comply with the regulations of the CDFW and the Service, including the Migratory Bird Treaty Act. As such, impacts would be less than significant and no mitigation is required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Vegetation within the Project area includes 36 on-site trees and 8 street trees located in the public right-of-way. The Project would result in removal of 16 trees and the encroachment of two trees located on the Project site. None of which are protected, however, as described under Threshold 4.4(a), measures outlined in the arborist report prepared for the Project would be implemented to minimize impacts to encroached-upon trees. Additionally, the proposed Project would result in the removal of one tree located in the public right-of-way, which is regulated under Section 62.170 of the City's Municipal Code. The Project applicant, however, would be required to replace the removed street tree at a ratio of 1:1 with 48-inch box or larger trees, as established by the City's Department of Urban Forestry. As such, the proposed Project would comply with any local policies or ordinances protecting biological resources, as impacts would be less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. According to the CDFW, there is no Natural Communities Conservation Plan located on or in the vicinity of the Project site. As such, there are no adopted, approved, or proposed Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plans that cover habitats located within the Project site's vicinity (CDFW 2019). Given this, the proposed 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. No impact would occur and no mitigation is required.

Cumulative Impacts

All three (3) Related Projects are located in a highly urbanized and developed areas that most likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian

habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. As discussed above, the Project would not result in any significant impacts on biological resources. Therefore, cumulative impacts related to biological resources would be less than significant.

4.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The information and analysis presented below are based primarily on the following (refer to Appendix C):

- Archaeological Resources Assessment, prepared by Dudek, January 2023.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less Than Significant with Mitigation. As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a "historical resource" is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (Public Resources Code Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (Public Resources Code Section 21084.1; 14 CCR 15064.5(a)).

As detailed in the Archaeologic Resources Assessment for the project (Appendix C), a review of available historical topographic maps revealed that in 1928, there was a small hill immediately to the northwest and an intermittent stream immediately to the east of the proposed Project site, and present-day Ventura Boulevard, located south of the proposed Project site, is depicted as a light duty road. In 1944, the proposed Project site was shown to be within an orchard. By 1954, the proposed Project site is no longer

depicted as an orchard and the intermittent stream to the east is no longer depicted. A review of available aerial photographs shows that in 1947, the proposed Project site was immediately west of a dense orchard, though the proposed Project site itself is shown consist of a sparse scatter of orchard trees and undeveloped. In the early 1950s, the areas immediately north and west of the proposed Project site is shown to have been subjected to substantial ground disturbance and development; however, there were no discernable changes to the proposed Project site. By 1967, the proposed Project site has been completely transformed and developed to be consistent with present-day site conditions.

A search of the California Historical Resources Information System (CHRIS) database for the proposed Project site and 0.5-mile records search area did not identify any previously recorded historic-period or prehistoric archeological resources. Moreover, a pedestrian survey of the project site did not identify any extant structures within the project footprint.

Therefore, the project would not cause a substantial adverse change in the significance of a known historical resource pursuant to §15064.5. However, the potential for intact cultural deposits (archaeological in nature, as opposed to historic in nature) to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, an assessment and evaluation of the resource would be conducted potentially resulting in the determination that the resource is historical in accordance with the definition outlined in §15064.5. As a result, the project has a potential to impact and thus cause a substantial adverse change in the significance of a yet unknown historical resource.

Thus, mitigation is required to address impacts related to the inadvertent discovery of yet unknown historical resources, as outlined in MM-CUL-1, MM-CUL-2, and MM-CUL-3. MM-CUL-1 requires that all project construction personnel participate in a Workers Environmental Awareness Program training for the proper identification and treatment of inadvertent discoveries. MM-CUL-2 requires the retention of an on-call qualified archaeologist to address inadvertent discoveries. MM-CUL-3 requires construction work be immediately halted if an unknown cultural resource is discovered until the qualified archaeologist, meeting the Secretary of Interior's Professional Qualification Standards for Archaeology, can assess and evaluate the discovery pursuant to CEQA. Additionally, MM-CUL-3 requires the inadvertent discovery clause be included on all construction plans. With implementation of MM-CUL-1, MM-CUL-2, and MM-CUL-3, significant impacts to historical resources would be reduced to less than significant with mitigation incorporated.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an Archaeological Resources Assessment that was prepared for the project (Appendix C).

As noted in response 4.5(a), above, a search of the CHRIS database for the proposed Project site and 0.5-mile records search area did not identify any previously recorded historic-period or prehistoric archeological resources. In addition, CHRIS records search results identified 11 studies as conducted within 0.5-mile of the proposed Project site; of these previous studies, three (3) overlap and two (2) are adjacent to the proposed

Project site. Approximately 25 percent of the proposed Project site has been subjected to previous investigations; however, it should be noted that these previous investigations are limited to the footprint of the existing hotel; no previous archaeological investigations or surveys have been conducted for the areas surrounding the existing hotel within the proposed Project site prior to development.

A review of a geotechnical report prepared for the proposed Project site determined that the subsurface conditions of the proposed Project site consists of asphalt concrete and base overlying fills soils, including artificial fills soils and artificial fill, undocumented soils, encountered from surface to between 3.5 and 8.25 feet bgs, depending on the area investigated. A pedestrian survey of the proposed Project site that was completed in November 2022 in support of the present study did not identify any cultural materials. However, due to the condition of the site at the time the fieldwork was conducted and the subsurface conditions documented in the geotechnical report, the negative result of the archaeological survey is considered less than reliable and not definitive evidence for determination of the sensitivity for archaeological resources within the proposed Project site.

According to the geotechnical report, recommended depths of ground disturbance is between 5 to 8 feet below existing ground surface across the proposed Project site for site preparation activities, including removal of undocumented fill soils and removal of existing improvements (i.e. foundations and underground utilities). The geotechnical report notes that site grading is not expected to require significant cut or fill (Leighton 2022). In consideration of the results of this study, while the potential to encounter intact cultural deposits containing archaeological resources within soils from the current grade and between 3.5 and 8.25 feet bgs is unlikely, the potential for intact cultural deposits to exist within native soils (below between 3.5 and 8.25 feet bgs) to the depths of proposed ground disturbance is unknown. In the event that unanticipated archaeological resources were encountered during Project implementation, 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. In addition, MM-CUL-1 through MM-CUL-3 are incorporated into the project to supplement the City's current standard conditions of approval (COA) and ensure that impacts to unanticipated archaeological resources would be less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. No prehistoric or historic burials were identified within the project site as a result of the CHRIS records search or pedestrian survey. In the event that human remains are inadvertently encountered during construction activities, such resources would be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant

would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with these regulations would ensure that impacts to human remains resulting from the project would be less than significant.

Mitigation Measures

To ensure that the project would not result in any significant impacts related to cultural resource, the following mitigation measures would be implemented:

MM-CUL-1: Workers Environmental Awareness Program Training. All construction personnel and monitors who are not trained archaeologists should be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet should be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker should also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor. To ensure consistency of the training with the City's standard conditions, a cultural resource inadvertent discovery clause should be included on all construction plans, and a copy kept on the Project site throughout the duration of all construction tasks.

MM-CUL-2: Retention of a Qualified Archaeologist. A qualified archaeologist should be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities.

MM-CUL-3: Inadvertent Discovery Clause. If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

Project development activities may resume once copies of the archaeological survey, study or report are submitted to the following:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, California 92834

Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Cumulative Impacts

The individual, Project-level impacts associated with cultural resources were found to be less than significant with incorporation of mitigation measures (MM-CUL-1, MM-CUL-2, and MM-CUL-3). The Project would be required by law to comply with all applicable federal, state, and local requirements related to historical, archaeological resources. The three (3) Related Projects would similarly be required to comply with all such requirements and regulations, to be consistent with the provisions set forth by CEQA and the CEQA Guidelines, and to implement all feasible mitigation measures should a significant project-related and/or cumulative impact be identified. As such, cumulative impacts would be less than significant.

4.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – 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) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

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.

Less-than-Significant Impact. The electricity and natural gas used for construction of the proposed project would be temporary, would be substantially less than that required for project operation, and would have a

negligible contribution to the project's overall energy consumption. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in vehicle miles traveled (VMT) over time.

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers) would be provided by Southern California Edison. The electricity used for such activities would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the Petroleum subsection. Any minor amounts of natural gas that may be consumed because of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix A lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in 2023 and 2024 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction equipment is shown in Table 4.6-1.

Table 4.6-1. Total Proposed Project Construction Petroleum Demand

Project	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	Gallons			
Total for one year	26,302	156	4,294	6,100

Sources: Pieces of equipment and equipment CO_2 (Appendix A); kg/CO_2/Gallon (The Climate Registry 2021).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

In summary, construction of the project is anticipated to consume 6,100 gallons of gasoline and 30,752 gallons of diesel over the course of 12 months. The project will be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements.

Operation

Electricity

The operation of the project would require electricity for multiple purposes, including cooling, lighting, appliances, and powering various equipment, such as electric forklifts. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs and spreadsheet calculations for water, wastewater, and electric forklifts presented in Appendix A.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning [HVAC] system; water heating system; and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2022. According to these estimations, the project would consume approximately 429,741 kilowatt-hours per year during operation (Appendix A).

Natural Gas

The operation would require natural gas for various purposes, including water heating and natural gas appliances. Natural gas consumption associated with operation is based on the CalEEMod outputs in Appendix A.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2022. According to these estimations, the project would consume approximately 96,495 thousand British thermal units per year.

Petroleum

During operations, most of the fuel consumption resulting from the project would involve the use of forklifts and motor vehicles traveling to and from the project site.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. As shown in Appendix A and as discussed in Section 4.3 and Section 4.8, the annual VMT attributable to the project is expected to be 836,722 miles. Like the construction worker and vendor trips, fuel consumption from worker and truck trips are estimated by converting the total CO_2 emissions from operation of the project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Mobile source emissions were estimated using EMFAC2017. Calculations for annual mobile source fuel consumption are provided in Table 4.6-2.

Table 4.6-2. Operational Annual Mobile Source Petroleum Demand

Fuel	Source	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Gasoline	Vehicles	234.53	8.78	26,711.71
Diesel	Vehicles	31.98	10.21	3,132.34
			Total	**29,884.05**

Sources: Trips and vehicle CO_2 (Appendix A); kg/CO_2/Gallon (The Climate Registry 2021).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram

As shown in Table 4.6-2, total petroleum consumption for the project annually is estimated to be 29,884 gallons.[9]

Summary

In summary, although natural gas and electricity usage would increase due to the implementation of the project, the project would be subject to the State Building Energy Efficiency Standards. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts to energy resources during operation would be less than significant.

Over the lifetime of the project, the fuel efficiency of the vehicles being used by the visitors and employees of the project is expected to increase. As such, the amount of gasoline consumed because of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emission vehicles in California (CARB 2017a).

9 For context, California as a whole is expected to consume approximately 18.0 billion gallons of petroleum per year by 2023 (CARB 2021). Countywide total petroleum use by vehicles is expected to be 1,114 million gallons per year by 2024 (CARB 2021).

Additionally, in response to SB 375, CARB has adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8 percent by the year 2020 and 13 percent by the year 2035 for light-duty passenger vehicles in the SCAG planning area. This reduction would occur by reducing VMT through the integration of land use planning and transportation. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

The project would create additional electricity and natural gas demand by adding self-storage, office and building support space. New facilities associated with the proposed project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of non-residential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The project will meet applicable Title 24 requirements, other large-scale renewable energy systems including wind turbine generation, geothermal generation, energy storage and other renewable energy generation features are not considered technically or economically feasible and or demonstrated for a similar project. Additionally, site constraints include limited land availability and incompatibility with land use for large scale power generation facilities, as well as unknown interconnection feasibility and compatibility with utility provider systems. While the project site proposes to develop approximately 4,456 square feet of solar ready space on the roof, other onsite renewable energy systems are not considered feasible for the proposed project for the reasons stated above.

In summary, implementation of the project would increase the demand for electricity and natural gas at the project site and petroleum consumption in the region during construction and operation. However, as the project would be consistent with current regulations and policies, the project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. The project's energy consumption demands during construction and operation would conform to the State's Title 24 standards such that the project would not be expected to wastefully use gas and electricity. Since the proposed project would comply with Title 24 conservation standards, the proposed project would not directly require the construction of new energy generation or supply facilities or result in wasteful, inefficient, or unnecessary consumption of energy. Moreover, vehicle usage associated with the project would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts would be less than significant.

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

Electricity

During construction, electricity use would be nominal and would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electrical equipment would be powered off so as to avoid unnecessary energy consumption. The electricity used for Project construction activities would be temporary and minimal. Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP has over 7,880 megawatts of generation capacity from a diverse mix of energy sources and forecasts that its total energy sales between fiscal years 2022-2023 and 2029-2030 (when Project

construction is assumed to occur) would range from 22,802 to 24,609 GWh.[10] As such, the Project's minimal construction electricity needs would be within the supply and infrastructure service capabilities of LADWP, and it would not require additional capacity.

The Project's operation would result in an increase in electricity use at the project site; however, it is anticipated that LADWP's existing and planned local and regional electricity capacity and electricity supplies would be sufficient to support the project's electricity demand and would not require additional capacity.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support Project construction activities; thus, there would be no natural gas demand estimated to be generated by proposed project construction.

In relation to operation, the proposed project would result in an increase in natural gas consumption at the project site. Nonetheless, it is anticipated that SoCalGas's existing and planned local and regional natural gas supplies would be sufficient to support the proposed project's natural gas demand and would not require additional capacity.

Petroleum

The proposed project would consume petroleum during construction associated with use of offroad equipment and vehicles (worker vehicles, delivery trucks, and haul trucks). As energy consumption during project construction activities would be short-term, the proposed project would not substantially affect regional energy consumption during the construction period and would not require additional capacity.

At buildout, project operation would consume a total of 26,712 gallons of gasoline and a total of 3,132 gallons of diesel per year, or a total of 29,884 gallons of petroleum-based fuels per year. The proposed project would include EV parking and charging stations in accordance with applicable LAMC requirements to encourage reduction in transportation fuel usage. Petroleum usage caused by the project would not likely have a significant effect on local and regional energy supplies or require additional capacity. Impacts would be less than significant.

3) The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy.

As discussed above, the electricity used for project construction activities would be temporary and minimal and would be within the supply and infrastructure service capabilities of LADWP.

Operation of the project would result in an increase in electricity demand. LADWP forecasts that its total energy sales in 2025 will be 24,738 GWh of electricity. Based on the Project's estimated electrical consumption of 429,741 kWh/year, the Project would account for approximately 0.002 percent of LADWP's total projected sales during 2030 for the Project's 2025 buildout year. The 2017 Power Strategic Plan Long-Term Resources Plan forecasts to the 2039-2040 fiscal year, which estimates total energy sales of

[10] LADWP, 2017, 2017 Power Strategic Long-Term Resource Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=krxi0zydc_17&_afrLoop=1448741471373090

27,668 GWh. As such, if the Project would be built out in a future year, as allowed by the Development Agreement, energy demand is anticipated to be accommodated within the LADWP load forecasting, which generally increases over time.

Regarding peak load conditions, the LADWP experienced a peak of 6,432 MW on August 31, 2017. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.[11] Under peak conditions, the Project would consume a total of 429,741 kWh on an annual basis, which is equivalent to a daily peak load of 49 kW.[12] In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.0008 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities, and there would be no natural gas demand generated by construction.

As stated above, operation of the Project would result in an estimated 965 therms per year (or approximately 96,495 kBTU per year) of natural gas. In 2017, SoCalGas supplied 2,504 million cubic feet per day to its service area. Assuming a conversion factor of 1 million cubic feet to 1 thousand dekatherms, this equates to 25 million therms per day. Therefore, the Project would consume 0.00004 percent of SoCalGas's daily supply.[13]

As consumption of fuel for transportation during project construction activities would be relatively negligible,[14] the project would not likely affect regional energy consumption in years during the construction period and would not require additional capacity.

At buildout, project operation would consume a total of 26,712 gallons of gasoline and a total of 3,132 gallons of diesel per year, or a total of 29,844 gallons of petroleum-based fuels per year.[15] As a result, petroleum-based fuel usage caused by the project would not likely have a significant effect on local and regional energy supplies or require additional capacity. Impacts would be less than significant.

Electricity, natural gas, and transportation energy supplies would be sufficient to serve the Project's peak energy consumptions as discussed above, and impacts would be less than significant.

11 LADWP, 2017 Power Strategic Long-Term Resource Plan, 2017 Retail Electric Sales and Demand Forecast, p. 6, December 2017.

12 Load factor calculations to estimate peak load is based on California Public Utilities Commission, Report: System Efficiency of California's Electric Grid, p.11, Figure 6, May 22, 2017.

13 California Gas and Electric Utilities, 2018 California Gas Report, p. 80, accessed October 2018.

14 For context, within Los Angeles County, transportation fuel usage during total Project construction activities would represent approximately 0.0001 percent of the 2023 annual on-road energy consumption (4.08 billion gallons) and 0.0049 percent of the 2023 annual off-road diesel energy consumption (41 million gallons).

15 For context, within Los Angeles County for 2025, the transportation-related fuel usage for total Project operation would represent approximately 0.01 percent of the annual on-road gasoline (3.47 billion gallons) and approximately 0.01 percent of the annual on-road diesel-related energy consumption (548 million gallons).

4) The Degree to which the Project Complies with Existing Energy Standards.

Electricity and natural gas usage during Project operations, as presented in Tables IV.C-7 and IV.C-8, respectively, would comply with 2022 Title 24 standards, including the 2022 CALGreen Code, and the Los Angeles Green Building Code.[16] Therefore, Project operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project site are assumed to comply with CAFE standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions and generate fuel savings in addition to CAFE standards. Therefore, Project operational activities would comply with existing energy standards with regards to transportation fuel consumption. Project impacts would be less than significant.

5) Effects of the Project on Energy Resources.

As discussed above, LADWP's electricity generation is derived from a mix of nonrenewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resource Plan identifies adequate resources to support future generation capacity. Project construction and operation activities would have a less-than-significant impact on electricity supply because the Project would result in a comparatively minimal increase in electricity demand. Moreover, as discussed above in the Regulatory Framework, one of the objectives of SB 100 is to increase procurement of California's electricity from renewable sources to 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, geothermal, hydroelectric and biomass/biowaste sources. These sources account for 35.2 percent of LADWP's overall energy mix in 2021, the most recent year for which data are available.[17] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western U.S. as well as Canada.[18] According to the U.S. Energy Information Administration, the U.S. currently has over 90 years of natural gas reserves based on 2016 consumption.[19] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, proposed project construction and operation

16 Los Angeles Green Building Code (LAGBC). https://www.ladbs.org/services/green-building-sustainability, and https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-214608.

17 LADWP, 2021, 2021 Power Content Label: Los Angeles Department of Water and Power, October 2022. https://www.ladwp.com/powercontent

18 California Gas and Electric Utilities, 2018 California Gas Report, accessed October 2018.

19 U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? Accessed October 2018.

activities would have a less-than-significant impact on natural gas supply due to the relatively minimal increase in natural gas demand.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[20] The proposed project would also comply with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). The project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, proposed project construction and operation activities would have a negligible effect on the transportation fuel supply.

With regard to on-site renewable energy sources, the project's buildings will be solar ready to potentially generate renewable energy on site in the future and reduce demand for energy produced off-site. Due to the proposed project site's location, however, other on-site renewable energy sources would not be feasible to install on site.[21] Additionally, wind-powered energy is not viable on the project site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project site is not identified as an area with wind resource potential.[22] Impacts would be less than significant.

6) The Project's Projected Transportation Energy Use Requirements and its Overall Use of Efficient Transportation Alternatives.

During operation of the proposed project, the majority of fuel consumption would involve the use of motor vehicles traveling to and from the proposed project site. Petroleum fuel consumption associated with the proposed Project is a function of the VMT as a result of proposed project operation. As discussed in Sections 4.3, Air Quality; 4.8, Greenhouse Gas Emissions; and 4.14, Transportation and Traffic, the analysis has estimated the number of trips associated with the proposed project, which would result in additional fuel consumption and energy use associated with transportation. The proposed project would result in a total of approximately 836,722 VMT per year.

Calculations for annual mobile-source fuel consumption are provided in Table 4.6-2, Mobile Source Fuel Consumption – Operation. Mobile sources from the proposed project would result in approximately 26,712 gallons of gasoline fuel consumed per year and approximately 3,132 gallons of diesel fuel consumed per year at Project buildout.[23]

The project would also be located in within an already developed parcel within the dense Ventura Boulevard Corridor would provide neighborhood serving self-storage amenities to nearby residences and businesses. By locating the project near other business and residences the proposed project would help enable a reduction in VMT and associated petroleum demand.

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20 BP P.L.C, Oil reserves., January 2022. https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html, accessed January 18, 2022.

21 Other renewable energy sources determined to not be feasible include biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels.

22 CEC, Wind Resource Area & Wind Resources. https://planning.lacity.org/eir/8150Sunset/References/6.0.%20Other%20CEQA%20Considerations/OTHER.05_CEC,%20California%20Wind%20Resource%20Potential_August%202014.pdf.

23 For context, as estimated for 2019, California as a whole consumed over 18 billion gallons of petroleum per year (California Board of Equalization, Net Taxable Gasoline Gallons 10 Year Report).

As such, the Project's siting and design would minimize transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section 3.8, Greenhouse Gas Emissions. As discussed above, the project would encourage the use of efficient transportation alternatives. Proposed project impacts would be less than significant.

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

Less-than-Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California to reduce energy demand and consumption. As such, the project would comply with the California code requirements for energy efficiency.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under the California Green Building Standards, also known as CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, state-owned buildings, schools, and hospitals, as well as certain residential and non-residential additions and alterations. On this basis, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

Cumulative Impacts

Cumulative projects that could exacerbate the Project's energy impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, the Project itself would not result in wasteful, inefficient, or unnecessary use of energy during construction or operation. Construction will result in short-term and temporary energy demands. Operation of the Project would not result in a wasteful, inefficient or unnecessary use of energy or conflict with an applicable plan. Therefore, the Project would have a less-than-significant impact with regards to cumulative energy impacts.

4.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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?	☐	☐	☒	☐
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 waste water 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 information and analysis presented below are based primarily on the following (refer to Appendix D):

- Geotechnical Engineering Report, prepared by Leighton Consulting, Inc., August 2022

a) Would the project 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 Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. The Woodland Hills is traversed by the Malibu Coast Fault (City of Los Angeles 2022). The Malibu Coast Fault and Santa Susana as identified in the Geotechnical Investigation, are located approximately 9.1 and 9.5 miles of the project site. The proposed development lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered unlikely (Appendix D). Additionally, based on a review of the CDOC regulatory maps, the project site is not located in a designated Fault Hazard Zone (CDOC 2022b). Therefore, no impacts associated with fault rupture would occur.

ii) Strong seismic ground shaking?

Less-than-Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to strong ground shaking during an earthquake. However, as previously addressed in Section 4.7(a)(i), the project site is not located in a designated Alquist-Priolo Earthquake Fault Zone. Pursuant to Sec. 91.7012. Construction Requirements and Limitations, of the City of Los Angeles Municipal Code, the project would incorporate the design recommendations included in its geotechnical report, which will be subject to review and approval by City staff prior to issuance of a grading permit. The project's geotechnical report provides specific design recommendations to ensure the structural integrity of the project in the event that seismic ground shaking is experienced at the project site. These recommendations include performing remedial grading, over-excavating existing soils, and recompacting these soils with structured fill, among other technical design recommendations (Appendix D). Additionally, the project's structures would be designed consistent with the most recent version of the California Building Code, which includes universal standards relating to seismic load requirements. With implementation of the recommendations of the project's geotechnical report, impacts associated with strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above. Liquefaction can be induced by ground-shaking events and is dependent on soil saturation conditions. Regional mapping by the California Department of Conservation shows that this site is located in an area of potential liquefaction (California Department of Conservation 2022). However, the Geotechnical Report prepared specifically for the project site determined there is a low potential for liquefaction to occur (Appendix D). In addition, development of the project itself would not increase the likelihood of liquefaction to occur. Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. The project site is highly urbanized and is not identified as having a potential for slope instability per the City of Los Angeles Safety Element of the General Plan is not located within a Hillside Area. Furthermore, the site is not within a California Division of Mines and Geology Seismically Induced Landslide Hazard Zone. The project site is relatively flat and is not within an area susceptible to landslides as shown in Figure 7, Seismic Hazard Map. Therefore, no impact associated with landslides would occur on the proposed project site.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Short-Term Construction Impacts

Less-than-Significant Impact. Ground surfaces that would be temporarily exposed during construction could result in erosion or loss of soil during storm events. Construction projects that involve the disturbance of 1 or more acres of soil, including clearing, grading, and disturbances to the ground such as stockpiling or excavation, are required to obtain coverage under the State Water Resources Control Board General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit). The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP) and the installation of BMPs (SWRCB 2022), which would reduce the potential for both stormwater runoff and soil erosion impacts. Therefore, short-term construction impacts associated with soil erosion would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Following construction of the project, ground surfaces would be covered by the proposed self-storage building or otherwise stabilized with landscaping and paving. The stormwater generated on site, along with any sediments contained within the stormwater, will be directed into an on-site underground infiltration/detention system to be treated on site. Therefore, the potential for substantial soil erosion or the loss of topsoil is considered less than significant.

c) Would the project 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 previously discussed, the potential for the project to result in or be affected by landslides and liquefaction is low, and these issues are not anticipated at the project site. The project would be designed consistent with the specific design recommendations of the project's geotechnical report, which provides recommendations to perform remedial grading, over-excavate existing soils, and recompact these soils with structured fill, among other technical design recommendations (Appendix D). Implementation of these recommendations would address these potentially hazardous conditions and ensure structural integrity in the event that seismic-related issues are experienced at the project site. With implementation of the recommendations of the project's geotechnical report, impacts would be less than significant.

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

Less-than-Significant Impact. Expansive soils are characterized by their potential shrink/swell behavior. Shrink/swell is the change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the cycle of wetting and drying. Much of the damage to building foundations, roads, and other structures can be caused by the swelling and shrinking of soils as a result of wetting and drying. The upper soils at the project site are very low (Expansion Index=0-35) in expansion potential (Appendix D). Further, compliance with California Building Code requirements would reduce the potential risk to people and structures due to unstable and expansive soils. Therefore, impacts associated with expansive soils would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would connect directly to the municipal sanitary sewer system and would not require septic tanks or any other alternative wastewater disposal system. Therefore, no impacts associated with the ability of soils to support septic tanks would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-Significant Impact with Mitigation Incorporated. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing hotel, pool, and surface parking. The Project would require excavation for the building foundations, utility and foundation work, and grading, which may cause an inadvertent discovery of a unique paleontological resource. As is the case with most development projects that involve earthwork activity, there is always a possibility that subsurface construction activity could unearth a potentially significant paleontological resource. **MM-GEO-1** would be required to ensure that subsurface construction activity complies with the standard procedures for treatment of unanticipated discovery of paleontological resources; therefore, with incorporation of mitigation, impacts associated with paleontological resources would be **less than significant**.

Mitigation Measures

To ensure that the project would not result in any significant impacts related to paleontological resources, the following mitigation measure would be implemented:

MM-GEO-1 Discovery of Paleontological Resources. In the event that paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. 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.

Cumulative Impacts

Geological

Less than Significant. Geotechnical hazards tend to be site-specific because conditions can change over relatively short distances and they tend not to combine to become cumulatively considerable. Cumulative projects would be designed and constructed in accordance with the requirements of the City Building and Safety Departments, which have been established in compliance with the CBC and which contain universal standards for site preparation (e.g., fill compaction standards) and grading practices, foundations design, and guidelines for the appropriate foundation design to ensure that improvements are located on stable materials and do not cause underlying materials to become unstable. Therefore, the cumulative impact related to geologic impacts, including those related to slope stability and expansive soils, would be less than significant.

Paleontological

As discussed under Threshold "F," the Project would have the potential to indirectly destroy a unique paleontological resource or site or unique geologic feature. Potential cumulative impacts to paleontological resources would result from projects that combine to create an environment where fossils, exposed on the surface, are vulnerable to destruction by earthmoving equipment, looting by the public, and natural causes such as weathering and erosion. The majority of impacts to paleontological resources are site-specific and are therefore generally mitigated on a project-by-project basis. Cumulative projects would be required to assess impacts to paleontological resources through the environmental review (CEQA) process. Additionally, as needed, projects would incorporate individual mitigation for site-specific geological units present on each individual project site. Furthermore, the Project does not propose construction (including grading/excavation) or design features that could directly or indirectly contribute to an increase in a cumulative impact to paleontological resources, as the implementation of MM-GEO-1 provided in this analysis ensures any significant paleontological resources uncovered during Project excavations would be properly handled. Therefore, the Project, in combination with the past, present, and reasonably foreseeable future projects adjacent to the Project, would result in less than significant cumulatively considerable impacts to paleontological resources.

4.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The information and analysis presented below are based primarily on the following (refer to Appendix A):

- Air Quality, Greenhouse Gas Emissions, and Energy Modeling Inputs and Outputs, prepared by Dudek, January 2023.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

See response b) below as both criterial can be addressed together.

b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less-than-Significant Impact. Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).[24] The three (3) GHGs evaluated herein are CO_2, CH_4, and N_2O because these gases would be emitted during project construction and operation.

[24] Climate-forcing substances include greenhouse gases (GHGs) and other substances such as black carbon and aerosols. This discussion focuses on the seven GHGs identified in the California Health and Safety Code Section 38505; impacts associated with other climate-forcing substances are not evaluated herein.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e). Consistent with CalEEMod Version 2020.4.0, this GHG emissions analysis assumed the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

This analysis relies on the Appendix G Thresholds. The 2006 L.A. CEQA Thresholds Guide does not identify any criteria to evaluate GHG emissions impacts. State CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider other qualitative factors that may be used in the determination of significance:

A lead agency should consider the following factors, among others, when assessing the significance of GHG emissions on the environment:

a. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
b. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
c. 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 (see, e.g., Section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG impacts. Per CEQA Guidelines Section 15064.7I, 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 agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association or SCAQMD, as long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative.

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 will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[25] To qualify, such a plan or program 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.[26] 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."[27] Put another way, CEQA Guidelines

25 14 CCR Section 15064(h)(3).
26 14 CCR Section 15064(h)(3).
27 14 CCR Section 15064(h)(3).

Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies 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)(2) 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 GHG emissions. For this Project, as a land use development project, the most directly applicable plans to reduce GHG emissions are the following:

- CARB Climate Change Scoping Plan, AB 32, Executive Order S-3-05, SB 32, the Los Angeles Green Building Code, and other laws and regulations
- SCAG's 2020-2045 RTP/SCS
- L.A.'s Green New Deal

In October 2008, SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold.[28] This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency.[29] This SCAQMD interim GHG significance threshold is not applicable to the Project since the Project is a self-storage commercial building, and the City is the lead agency.

Senate Bill 32 and CARB's 2022 Scoping Plan

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.[30] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[31] The 2017 Scoping Plan Update,[32] shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by

28 SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.
29 See SCAQMD Resolution No. 08-35, December 5, 2008.
30 CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.
31 CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.
32 CARB. 2017. California's 2017 Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[33] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

Table 3.8-1. Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

Notes:
$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative *values.*
[a] 312 – 260 = 52. 52 / 312 = 16.7%
Source: CARB, Final 2022 Climate Change Scoping Plan, November 2022

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

[33] CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

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

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan). The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with the LAMC by installing EV chargers in at least 10 percent of total proposed parking spaces which would exceed the CALGreen 2022 requirement.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, vehicle miles traveled (VMT), and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and LADOT bus lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. Therefore, the Project would be consistent and not conflict with the LAMC.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG 2020–2045 RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light trucks in the Southern California Region pursuant to SB 375. In addition to demonstrating the Region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020–2045 RTP/SCS[34] and reducing GHGs: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region. The strategies that pertain to residential development and SCAG's support of local jurisdiction sustainability efforts would not apply to the Project. The Project's compliance with the remaining applicable strategies is presented below.[35]

- **Focus Growth Near Destinations and Mobility Options.** The Project's compliance with this strategy of the 2020–2045 RTP/SCS is demonstrated via the Project's land use characteristics and features that would reduce vehicular trips and VMT. Regarding VMT reduction characteristics, The project would be located within an already developed parcel within the dense Ventura Boulevard Corridor and would provide neighborhood serving self-storage amenities to nearby residences and businesses. By locating the project near other business and residences the proposed project would help enable a reduction in VMT. The project is also an infill development that is located approximately within a quarter mile of the Ventura/Alhama bus stop for Metro Bus Line 150 and 601. The project would also be within walking and biking distance of existing residential and commercial uses. As such, the proposed project would provide employees with access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions.
- **Leverage Technology Innovations.** One of the technology innovations identified in the 2020–2045 RTP/SCS that would apply to the project is the promotion and support of low emission technologies for transportation, such as alternative fueled vehicles to reduce per capita GHG emissions. The Project would support this goal through the compliance with the Los Angeles Green Building Code, which requires that 30 percent of the total code required parking spaces be EV spaces and that 10 percent of the total code required parking spaces have EV chargers already installed to immediately accommodate EVs within the parking areas. Therefore, of the total 29 required parking spaces, eight (8) parking spaces would be EV ready and two (2) spaces would have EV chargers at project buildout.
- **Promote a Green Region.** The third applicable strategy within the 2020–2045 RTP/SCS, for individual developments, such as the Project, involves promoting a green region through efforts such as supporting local policies for renewable energy production and promoting more resource efficient development (e.g., reducing energy consumption) to reduce GHG emissions. The project would support this measure by complying with the 2022 title 24 building standards.

Based on the analysis above, the project would be consistent with the SCAG 2020–2045 RTP/SCS.

Green LA and Sustainable City pLAn/Green New Deal

Table 3.8-2. Project Consistency with the Targets of L.A.'s Green New Deal

Action	Project Consistency
Renewable Energy	**Consistent.** While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy

[34] SCAG, Connect SoCal, adopted September 3, 2020.
[35] Please refer also to Section IV.I, Land Use and Planning, of this Draft EIR, for additional discussion of the applicable provisions of the 2020–2045 RTP/SCS that apply to the Project.

Table 3.8-2. Project Consistency with the Targets of L.A.'s Green New Deal

Action	Project Consistency
Increase cumulative megawatts (MW) by 2025; 2035; and 2050 of: ▪ Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW Energy ▪ Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW ▪ Demand response (DR) programs to 234 MW (2025) and 600 MW (2035)	resources to 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the Project Site, the project would use electricity consistent with the requirements of SB 100 and City goals.
Water Reduce potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The project would also be required to comply with the Title 24 standards that are in effect at the time of development.
Building Energy ▪ All new buildings will be net zero carbon by 2030; and 100 percent of buildings will be net zero carbon by 2050 ▪ Reduce building energy use per square foot for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050	**Consistent.** The project would be built consistent with the applicable requirements of CALGreen and the City's Green Building Code.
Transportation ▪ Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025; 50 percent by 2035; and maintain at least 50 percent by 2050 ▪ Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050 ▪ Increase the percentage of electric and zero emission vehicles in the City to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050	**Consistent.** The proposed project is an infill development that is located approximately within a quarter mile of the Ventura/Alhama bus stop for Metro Bus Line 150 and 601. The project would also be within walking and biking distance of existing residential and commercial uses. Therefore, the Project would support increasing the percentage of trips made by walking, biking, and transit as well as the reduction of per capita VMT The project would also include 8 EV spaces and 2 EV spaces with chargers at project buildout.
Waste and Recycling ▪ Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050 ▪ Eliminate organic waste going to landfill by 2028 ▪ Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 ▪ Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25 percent by 2025; and 50 percent by 2035	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angele Sanitation and Environment 2022). The project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.

Source: City of Los Angeles, L.A.s Green New Deal – Sustainable City pLAn, 2019.

As shown in Table 3.8-2, the project would not conflict with any of the GHG targets set forth in L.A.'s Green New Deal. Thus, the project is consistent with this plan. The plan consistency analysis demonstrates that the project complies with or exceeds the requirements of policies, regulations and GHG reduction actions/ strategies outlined in the 2022 Scoping Plan, the 2020–2045 RTP/SCS, and the Sustainable City pLAn/Green New Deal. Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions to a less than significant level.

GHG Emissions Quantification

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.3. Construction of the project is anticipated to commence in January 2023, lasting a total of 12 months and reaching completion in February 2024. On-site sources of GHG emissions include off-road equipment and off-site sources include haul trucks, vendor trucks, and worker vehicles. Table 3.8-3 presents construction GHG emissions for the project from on-site and off-site emission sources.

Table 3.8-3. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2023	211.34	0.03	<0.01	213.55
2024	156.18	0.02	<0.01	157.75
			Total	371.3
			Amortized Emissions (over 30 years)	12.38

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3.8-3, the estimated total GHG emissions during construction of the project would be approximately 371 MT CO_2e. Estimated project-generated construction emissions amortized over 30 years would be approximately 12 MT CO_2e per year. As with project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Greenhouse Gas Emissions

CalEEMod Version 2020.4.0 was used to estimate potential project-generated and exiting land use operational GHG emissions from area sources (landscape maintenance), natural gas combustion, electrical generation, water supply and wastewater treatment, solid waste. As with the air quality analysis, mobile source GHG emissions were estimated using CalEEMod based on EMFAC2017 emission factors. Emissions from each category—area sources, energy sources, mobile sources, solid waste, water supply and wastewater

treatment, and off-road equipment—are discussed in the following text with respect to the project. For additional details, see Section 4.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources. Operational year 2025 was assumed to be the first full year of operation following completion of construction.

Area Sources

CalEEMod was used to estimate GHG emissions from the project's area sources, including operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. It was assumed that 100 percent of the landscaping equipment would be gasoline powered. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and low to no GHG emissions.

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and square footage of the project's land uses. For non-residential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) assumptions were based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO2 and other GHGs.

The current Title 24, Part 6 standards, referred to as the 2022 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2022. The current version of CalEEMod assumes compliance with the 2019 Title 24 Building Energy Efficiency Standards (CAPCOA 2021).

The CalEEMod default energy intensity factor (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) were utilized for Southern California Edison. SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by December 31, 2020, and SB 100 calls for further development of renewable energy, with a target of 44% by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. As such, GHG emissions associated with project electricity demand would continue to decrease over time.

Mobile Sources

Following the completion of construction activities, the Project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of employees and visitors. CalEEMod default data, including temperature, trip length, trip characteristics, variable start information, and emissions factors, were conservatively used for the model inputs. Project-related traffic was assumed to include a mixture of vehicles in accordance with the associated use, as modeled within CalEEMod, which is based on the California Air Resources Board (CARB) EMFAC2017 model. Emission factors representing the vehicle mix and emissions for 2025 were used to estimate emissions associated with vehicular sources. The ITE Trip Generation, [1]1th edition was used to estimate trip rates for the project using the min-warehouse 151 land use.

Solid Waste

The project would generate solid waste and therefore, would result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

Proposed Project without Reduction Measures Scenario

The Project without Reduction Features scenario incorporated the following assumptions based on project Site characteristics, and applicable regulations.

- **Building Energy Efficiency and Lower Carbon Intensity for Electricity.** The 2008 Title 24 energy usage factors were incorporated to estimate the building energy efficiency for the Project without Reduction Features scenario. Also, under the RPS, LADWP is required to reduce the carbon intensity of their electricity. For the Project without Reduction Features scenario, 20 percent renewables were assumed, pursuant to the requirement of SB X1-2.
- **CAPCOA Measures - Project Siting VMT reductions.** The proposed project would increase of the on-site density measured in jobs per acre, the increase diversity of urban and suburban developments and the increase in destination accessibility. These would all result in a reduction in mobile source GHG emissions and VMT. These measures were not accounted for in the without reduction measures scenario.
- **Mobile Source Emissions.** Non-pavley CO_2 emission factors were utilized in the "without reduction measures" scenario as provided in the CalEEMod User guide (CAPCOA 2020).

The estimated operational (year 2025) GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and off-road equipment are shown in Table 3.8-4.

Table 3.8-4. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Project without reduction measures Scenario				
Area	<0.01	<0.01	0.00	<0.01
Energy	153.95	0.01	<0.01	154.38
Mobile	388.34	0.02	0.01	392.08
Solid waste	21.41	1.27	0.00	53.04

Table 3.8-4. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Water supply and wastewater	114.27	0.85	0.02	141.67
			Total	**750.83**
Project with reduction measures Scenario				
Area	<0.01	<0.01	<0.01	<0.01
Energy	141.53	0.01	<0.01	141.96
Mobile	219.17	0.01	0.01	222.38
Solid waste	21.41	1.27	0.00	53.04
Water supply and wastewater	114.27	0.85	0.02	141.67
			Project Total	**559.05**
			Amortized Construction Emissions	*12.38*
			Percent Change due to reduction measures	*25%*
			Proposed Project + Amortized Construction Total	**571.43**

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3.8-4, estimated annual generated GHG emissions would be approximately 559 MT CO_2e per year as a result of project operation. Estimated annual operational emissions in 2025 with amortized project construction emissions of approximately 12 MT CO_2e per year would be approximately 571 MT CO_2e per year.

Cumulative Impacts

The Project's GHG emissions would be less than significant. As such, even in combination with the three (3) Related Projects, the project's overall contribution to GHG emissions would not be cumulatively significant and impacts would be less than cumulatively considerable.

4.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 that 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?	☐	☐	☐	☒

The information and analysis presented below are based primarily on the following (refer to Appendix E):

- Phase I Environmental Site Assessment, prepared by Leighton Consulting, Inc, July 2022.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Short-Term Construction Impacts

Less-than-Significant Impact. In July 2022, a Phase I ESA was prepared by Leighton Consulting, Inc. to characterize the potential hazards associated with the historical and current uses of the project site and surrounding areas (Appendix E). Historical uses of the project site included agricultural and vacant land from as early as 1920. In 1967 the project-site constructed its present-day hotel building. Currently, the site contains a hotel building, parking areas, and a swimming pool that would be moved to the eastern portion of the project site.

Long-Term Operational Impacts

Less-than-Significant Impact. Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2022). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste.

Additionally, as a self-storage facility with household goods self-storage uses with an office component, the types of hazardous materials that could be used as part of its operation would include cleaning supplies and landscaping fertilizers/pesticides that are typical of a self-storage use, all of which would be used and stored in accordance with manufacturer requirements. In addition, the storage of hazardous materials would be prohibited within the individual storage units. Thus, the Project would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to hazardous materials would be less than significant.

b) Would the project 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. Refer to response provided in Section 4.9(a). For these reasons, the Project would not 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. Therefore, less than Significant Impact related to this issue would occur as a result of the Project.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school to the project site is Serrania Charter for Enriched Studies – SCES Elementary School (5014 Serrania Ave), which is located 0.7 miles south of the Project site. Therefore,

no impacts associated with emitting or handling hazardous materials within 0.25 miles of a school would occur. As discussed previously, the Project includes development of the Project Site with a self-storage use (with an office component), similar to other commercial uses already found in the Project Site area and region that would use common types of cleaning products, paint, petroleum products, etc. The proposed self-storage use would not generate hazardous emissions. 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 no impact.

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

Less-than Significant Impact. The project site is listed in the California Hazardous Waste Manifest (HAZNET) and Hazardous Waste Tracking System (HWTS) databases. The Project site address is listed in the HAZNET database maintained by the Department of the Toxic Substances Control (DTSC). According to the EDR database report, the Project site is listed as having disposed of hazardous materials, including but not limited to asbestos containing waste and oil/water separation sludge. These listings are most likely associated with the neighboring hotel building to the south of the Project site. However, after review of the aerial photographs show the Project site as being historically used as a portion of the pool area, landscaped area, and the parking lost associated with the neighboring hotel. Therefore, impacts associated with hazardous materials sites would be less-than significant.

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, the Project would not result in a safety hazard or excessive noise associated with an airport for people residing or working in the Project Site area. The closest airports are the Van Nuys Airport (VNY) is located approximately 9.1 miles northeast of the Project site and the Los Angeles International Airport (LAX) is approximately 26 miles south of the Project site. The Van Nuys Airport and LAX both minimize noise by implementing noise management plans assigned by The Los Angeles World Airports (LAWA) to minimize noise impacts in neighboring communities (LAWA 2022). The proposed project would have a sound wall to reduce construction noise and would be consistent with the general land use of the area. Additionally, the project would be consistent with Sec. 41.40 Noise of the City's Municipal Code and construction would be between the hours of 7:00 A.M. and 9:00 P.M. Therefore, a less than significant impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. The City of Los Angeles has an Emergency Operations Plan to ensure the most effective and economical allocation of resources for the maximum benefit and protection of the City in times of emergency. No revisions to this plan would occur as a result of the project. The project does not propose any changes to the geometry of evacuation route roadways to the extent that these roadways' ability to serve as emergency evacuation routes would be compromised. As a result, the project would not

require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Prior to issuance of a building permit, the Project Applicant would be required by the City to develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with this City requirement, Project impacts related to this issue would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The City's General Plan does not designate the project site as an area that would be at risk from wildland fires. The Project includes infill development of the Project Site with a 112,204-square-foot self-storage facility inclusive of a ground floor office, storage, and building support space use within an urbanized area of the City, surrounded by established land use patterns and roadway and utility infrastructure. The Project would be required to comply with all fire protection and prevention requirements, including, but not limited to: inclusion of a fire suppression sprinkler system and smoke alarms, fire-rated walls, building setbacks, emergency access, and fire flow. As a self-storage facility and office use, the Project is a relatively low-density use that does exacerbate wildfire risks. Thus, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, Project impacts related to wildland fires would be less than significant.

Cumulative Impacts

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. As discussed above, the proposed Project would have less-than-significant impacts related to hazardous materials. The Related Projects would result in the use and transport of incrementally more oils, greases, and petroleum products for operation purposes. Although these could be subject to accidental spillage, there is no quantifiable cumulative effect, since accidents are indiscriminate events, not related or contributory to one another. Provided that individual projects adhere to current laws governing storage, transportation, and handling of hazardous materials, no significant cumulative hazards or threats to human health and safety are anticipated.

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

4.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – 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 offsite;	☐	☐	☒	☐
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) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less-than-Significant Impact. Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving

waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

The proposed Project would be required to comply with the NPDES State Water Resources Control Board Construction General Permit Order No. 2009-0009-DWQ for stormwater discharges and general construction activities, and would incorporate standard BMPs, such as regular cleaning or sweeping of construction areas and impervious areas, and various stormwater BMPs, such as filtration media screens. In compliance with the Construction General Permit, a SWPPP will be prepared for the Project that would specify BMPs that would be implemented during construction to minimize impacts to water quality. Furthermore, Project implementation of biofiltration, source control, and site design BMPs would effectively treat post-construction stormwater runoff prior to discharge form the site in compliance with the requirements of the BMP Design Manual and BMPs outlined in the SWQMP.

Furthermore, pursuant to Section 64.70.03 of the City's Municipal Code, the Project would be subject to the National Pollutant Discharge Elimination System Permit (MS4), issues to Los Angeles County by the Regional Water Quality Control Board. The MS4 Permit requires implementation of LID BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The LID Ordinance is designed to reduce runoff from impervious surfaces, including new development, through landscape design that promoted water retention, permeable surface design, natural drainage systems, and on-site retention where feasible. Implementation of the proposed Project is not anticipated to violate any water quality standards or waste discharge requirements, nor degrade surface or ground water quality. Therefore, impacts associated with water quality, stormwater drainage, and stormwater runoff would be less than significant.

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

Groundwater Supplies

Less-than-Significant Impact. The Project site is located in the service area of the Los Angeles Department of Water and Power (LADWP). LADWP receives water from a number of sources including the Los Angeles Aqueduct, the Metropolitan Water District of Southern California, local groundwater, and recycled water (LADWP 2020). As such, the proposed Project may result in the decrease of groundwater supplies when compared to existing conditions due to an increase in water demands. This decrease, however, would be minimal and would not result in a significant impact. As such, impacts on groundwater supplies would be less than significant.

Groundwater Recharge

Less-than-Significant Impact. Under existing conditions, the Project site contains grass and landscaped areas, some of which would be removed as part of the proposed Project. This has the potential to impact groundwater recharge on the site. The Project, however, would include improvements that would promote groundwater infiltration, including new landscaped areas and bioinfiltration planters. Additionally, the Project site is in a highly developed area and is not considered an important location for groundwater

recharge. During storm events, some of the storm water that encounters the project site is directed to the existing local storm drain system. No storm water at the project site reaches groundwater levels. As such, the project site is not a source of groundwater recharge. Under the project, all stormwater would be directed toward landscaped areas and/or the local storm drain system and would not have the ability to reach groundwater level at the project site. Therefore, impacts associated with groundwater recharge would be less than significant.

c) Would the project 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. Under existing conditions, the Project site is developed with a surface parking lot, ornamental landscaping, and a below-ground pool. The Project would involve the development of self-storage building, a surface parking lot, and landscaping improvements. The Project would also include a new engineered stormwater drainage system that would feature structural BMPs such as bioinfiltration infrastructure. While the Project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent possible, construction activities would inevitably result in changes to the internal drainage patterns of the site. However, the Project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. Additionally, the Project's structural BMPs would be designed to reduce the potential for erosion or siltation from occurring. As such, the alteration of the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater, such that it would not result in substantial erosion or siltation on- or off-site.

In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the project site after 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. Therefore, impacts associated with altering the existing drainage pattern of the Project site and erosion or siltation 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 offsite?

Less-than-Significant Impact. As discussed in Section 4.10(c)(i) the Project would result in changes to the internal drainage patterns of the Project site. However, the Project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. As such, alteration of the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater.

In addition, according to the Flood Insurance Rate Map No. 06037C1290F for the Project area, the Project site is located within Zone X, which is defined by the Federal Emergency Management Agency as an area located outside the 100-year and 500-year flood plains (FEMA 2023). Therefore,

impacts associated with altering the existing drainage pattern of the Project site and flooding 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?

Less-than-Significant Impact. As previously addressed, the project would inevitably alter the drainage patters of the project site; however, the project would include a new engineered stormwater drainage system that would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality. Alteration of the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing or planned rates. Therefore, impacts associated with altering the existing drainage pattern of the project site and stormwater would be less than significant.

iv) Impede or redirect flood flows?

No Impact. As previously discussed, according to the FEMA Flood Insurance Rate Map No. 06037C1290F (FEMA 2023), the project site is located in Zone X which is located outside of the 0.2 percent Annual Chance Flood Hazard Zone (500-year floodplain). The project's on-site storm drain systems would adequately provide flood protection for the 100-year storm event. Implementation of the project would not substantially impede or redirect flood flows. Therefore, no impacts associated with flooding would occur.

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

No Impact. The Project site is located approximately 9 miles north of the Pacific Ocean. Due to the Project's inland location, the Project would not be subject to tsunami. Additionally, there are no large adjacent waterbodies to the site, such as a reservoir or lake, that would possibly subject the site to seiche. Furthermore, the Project site is not located within a 100-year flood hazard area. The Project site is generally flat with no steep slopes and is not located adjacent to slopes that are subject to mudflows. Therefore, impacts associated with inundation would not occur, and there would be no impact.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-than-Significant Impact. Refer to responses provided in Section 4.10(a) and 4.10(b). The project would comply with regional and local regulations requiring preparation of a SWPPP and would not obstruct existing water quality control plans or groundwater sustainable management plans. In addition, the project applicant would comply with the project specific WQMP during operation activities. Therefore, impacts associated with conflict with a water quality control plan or sustainable groundwater management plan would be less than significant.

Cumulative Impacts

The proposed Project and the three (3) Related Projects are all located in an urbanized area on already developed properties. The existing storm drainage system serving the sites has been designed to accommodate runoff from an urban built-out environment. The development of these projects would be required to control the quantity and quality of stormwater runoff leaving the sites. All new development in the City is required to comply with the City's LID requirements and incorporate necessary stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

4.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – 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) Would the project physically divide an established community?

No Impact. The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. Currently, the project site is located within an area of the City that is primarily zoned for commercial and parking uses, and thus, is not used as a connection between two established communities.

Instead, connectivity in the surrounding project area is facilitated via local roadways and pedestrian facilities. Despite the nearby scattered residential uses, the project would not impede movement between these residences within the project area, within an established community, or from one established community to another. Therefore, no impacts associated with division of an existing community would occur.

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

Less-than-Significant Impact. The City's Zoning Map designates the project site as Commercial Zone (C4) and Automobile Parking Zone (P). The Project site is requesting a Zone Change and Height District Change from the existing C4-1LD and P-1LD Zones to the C2-2 Zone to allow for the proposed self-storage

building. This Zone Change and Height District Change would increase the maximum allowable building height from 45 to 80 feet 4 inches from grade to the top of the roof structure. Upon approval of the Zone Change and Height District Change to C2-2, the proposed Project would be required to comply with the C2 development standards outlined in the City's municipal code. The project would require the issuance of a Conditional Use Permit (CUP), pursuant to LAMC Section 12.24 W.50 for a storage building for household goods in the C2 Zone within 500 feet of a R Zone. Additionally, in conjunction with the CUP, the Project would require approval of a 20 percent decrease in the amount of required parking pursuant to LAMC Section 12.24 S. Because the Project includes development of more than 50,000 gross square feet of non-residential floor area, a Site Plan Review would be required pursuant to LAMC Section 16.05. While the proposed Project would amend the existing zoning regulations of the site, this change would not result in a significant environmental impact. Furthermore, this Zone Change and Height District Change would not impede the City's ability to achieve its established goals and policies.

The Project site is located in the Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan). The purposes of this Specific Plan are to address the needs of surrounding communities while promoting a harmonious relationship between circulation as well and commercial and multi-family development (City of Los Angeles 2001). This Specific Plan establishes requirements for development including a maximum building height of 45 feet, and maximum FAR of 1.25:1, and a minimum landscape buffer of 10 feet where surface parking meets the street. The Project proposes a Project Permit Compliance to permit the following exceptions from the Specific Plan for the self-storage facility: allow for a minimum of five (5) feet landscape buffer pre dedication (zero feet with dedication) along Clarendon Street on the self-storage facility and a 3-foot buffer pre dedication and zero feet after the dedication between the surface parking lot of the hotel and the street in lieu of the required 10 foot buffer along Alhama Drive; allow for a maximum building height of 80 feet 4 inches from grade to the top of the roof structure in lieu of the 45 feet maximum building height; and to allow for an increase in the maximum FAR to 3.54:1 (3.69:1 after dedication) in lieu of the maximum FAR of 1.25:1. In addition, in order to accommodate the new hotel pool area, the Project would require the following exceptions from the Specific plan for the hotel: allow for a 3-foot landscaped buffer pre dedication and zero-feet after the dedication between the surface parking lot and the street, in lieu of the required 10 feet buffer area and allow for 99 hotel parking stalls, pursuant to LAMC requirements, in lieu of the required 134 hotel parking spaces. These proposed exceptions would vary from the established Specific Plan requirements, however, they would not lead to a significant environmental impact as a result of their approval. Additionally, the implementation of the proposed Project would result in the development of self-storage building on underutilized land, which help to meet the needs of the community.

As detailed in the analysis and tables below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with the development of the Project Site including: Southern California Associate of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); SCAQMD's Air Quality Management Plan; City's General Plan Framework Element, the Canoga Park-Winnetka-Woodland Hills Community Plan Community Plan, the LAMC, and Ventura-Cahuenga Boulevard Corridor Specific Plan.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (also known as the Connect SoCal Plan) was adopted on September 3, 2020, and presents the land use and

transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges (SCAG 2020). The RTP/SCS explicitly lays out goals related to housing, transportation, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RTP/SCS development process involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RTP/SCS is to build upon and expanded land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Analysis of the project's consistency with the SCAG 2020 RTP/SCS goals is provided in Table 4.11-1.

Table 4.11-1. Regional Transportation Plan/Sustainable Communities Strategy Consistency Analysis

RTP/SCS Goals	Consistency Summary
RTP/SCS Goal 1. Encourage regional economic prosperity and global competitiveness.	**Not Applicable/Consistent.** This goal is directed towards the City and does not apply directly to the project. However, the project would involve construction and operation of a self-storage facility. Thus, the Project would generate jobs and tax revenue for the City and its residents. Once operational, the Project would provide commercial use that would help the City offer a more balanced array of land uses throughout the broader project area.
RTP/SCS Goal 2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The project would be developed in an existing commercial area with an established network of roads and freeways that would provide local and regional access to the project site. The self-storage facility would be easily and efficiently accessible via the nearby U.S. Highway 101 and Ventura Blvd. The project is in close proximity to existing public transit. Prior to development of the project, a detailed site plan review would be conducted by the City to ensure that site access would be adequate for fire and emergency access an would not create a design hazard to the local roadways. As such, the project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
RTP/SCS Goal 3. Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable/Consistent.** This goal is directed towards the City and does not apply directly to the project. However, a trip generation analysis was conducted for the project (Appendix G) and determined the proposed project would generation 163 daily trips, 10 AM peak hour trips and 17 PM peak hour trips. The project is screened from conducting a project specific VMT analysis due to the minimal generation of daily trips and would not significantly impact regional and local circulation systems.

Table 4.11-1. Regional Transportation Plan/Sustainable Communities Strategy Consistency Analysis

RTP/SCS Goals	Consistency Summary
RTP/SCS Goal 4. Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The project would include construction and operation of a self-storage facility, which would be easily and efficiently accessible via the nearby U.S. Highway 101 and would help to facilitate regional goods movement throughout Southern California.
RTP/SCS Goal 5. Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The project would involve development of a commercial use that inherently involves the emission of GHG and air contaminant emissions. An air quality and GHG analysis was completed for the project and concluded the project would not result in significant adverse effects related to air quality, health risk, and/or GHG emissions, and mitigation measures would not be required to minimize impacts. The project site is served by existing transit (Metro Routes 150, 150, and 601) and would encourage bicycling with the inclusion of 16 short-term and 16 long-term bicycle stalls for use by customers and employees. Sidewalks are provided on all of the surrounding streets and crosswalks are provided at all major intersections for use by customers and employees.
RTP/SCS Goal 6. Support healthy and equitable communities.	**Consistent.** The project would involve development of a commercial use that inherently involves the emission of GHG and air contaminant emissions. An air quality and GHG analysis was completed for the project and concluded the project would not result in significant adverse effects related to air quality, health risk, and/or GHG emissions, and mitigation measures would not be required to minimize impacts. The project would be required to comply with all applicable laws and regulations, including, but not limited to, the California Building Code, Construction General Permit, and the City's Green Building Ordinance. In addition, the project would minimize its potential environmental effects through the implementation of mitigation measures. Thus, the project would assist in this goal.
RTP/SCS Goal 7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** As climate change continues to increase the number of instances of disruption to local and regional systems, it will become increasingly more urgent for local jurisdictions to employ strategies to reduce their individual contributions. An air quality and GHG analysis was completed for the project and concluded the project would not result in significant adverse effects related to air quality, health risk,

Table 4.11-1. Regional Transportation Plan/Sustainable Communities Strategy Consistency Analysis

RTP/SCS Goals	Consistency Summary
	and/or GHG emissions, and mitigation measures would not be required to minimize impacts. In addition, the project would meet a local demand for self-storage space and would do so in an area that is proximate to a regional highway (U.S. Highway 101), thereby reducing the need for longer distance trips to another self-storage facility, thus a reduction in additional GHG emissions. The project site is served by existing transit (Metro Routes 150, 150, and 601) and would encourage bicycling with the inclusion of 16 long-term and 16 short-term bicycle parking spaces for use by customers and employees. Sidewalks are provided on all of the surrounding streets and crosswalks are provided at all major intersections for use by customers and employees.
RTP/SCS Goal 8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed towards the City and does not apply directly to the project.
RTP/SCS Goal 9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Not Applicable.** The project site is not zoned for housing, but rather commercial uses. Thus, this goal is not applicable.
RTP/SCS Goal 10. Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The project would be located on an area zoned for commercial uses. The project site does not support agriculture.

SCAQMD's Air Quality Management Plan

The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for SCAB is the 2022 AQMP (SCAQMD 2022). The 2016 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard (SCAQMD 2022).

The project's consistency with the SCAQMD's AQMD are discussed in detail in Section 4.3, Air Quality, as part of response III(a).

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a long-term strategy that guides the community plans and citywide elements that was adopted in December 1996 and re-adopted in August 2001. It provides direction regarding the City's vision for future development and responds to state and Federal mandates. The Framework Element includes policies related to Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.

Table 4.11-2. General Plan Framework Element Consistency Analysis

Goal/Objective/Policy	Consistency Summary
Land Use	
Goal 3A. A physically balanced distribution of land uses that contributes towards and facilitates the: ▪ City's long-term fiscal and economic viability, ▪ Revitalization of economically depressed areas, ▪ Conservation of existing residential neighborhoods, ▪ Equitable distribution of public resources, ▪ Conservation of natural resources, ▪ Provisions of adequate infrastructure and public services ▪ Reduction of traffic congestion and improvement of air quality, ▪ Enhancement of recreation and open space opportunities, assurance of environmental justice and healthful living environment, and ▪ Achievement of the vision for a more livable city.	**Consistent.** The project would more efficiently utilize the project site by constructing and operating a self-storage facility within a parcel that already has an established hotel. The Project would generate jobs and tax revenue for the City and its residents. Once operational, the Project would provide commercial use that would help the City offer a more balanced array of land uses throughout the broader project area. In addition, the project would meet a local demand for self-storage space and would do so in an area that is proximate to a regional highway (U.S. Highway 101), thereby reducing the need for longer distance trips to another self-storage facility. The project site is served by existing transit (Metro Routes 150, 150, and 601) and would encourage bicycling with the inclusion of 16 long-term and 16 short-term bicycle parking spaces for use by customers and employees. Sidewalks are provided on all of the surrounding streets and crosswalks are provided at all major intersections for use by customers and employees. This would assist in reducing VMT and associated GHG and other pollutant emissions.
Objective 3.1. Accommodate a diversity of uses that support the needs of the City's existing and future residents, business, and visitors.	**Consistent. T**he project would involve construction and operation of a self-storage facility within a commercial area to assist in meeting a local demand for self-storage space. The development of a storage facility at the project site would provide businesses with additional space to store inventory and equipment, which may improve operations and efficiency. Additionally, the availability of storage units in commercial areas may help reduce clutter and improve the overall appearance of the district.

Table 4.11-2. General Plan Framework Element Consistency Analysis

Goal/Objective/Policy	Consistency Summary
Policy 3.2.4. Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The Project would include both configuration of the existing hotel's features as well as the development of a self-storage facility. The development of storage units can impact the siting and design of a city's stable residential neighborhoods, as well as the character of commercial and industrial districts, but it is not a determining factor. In commercial and industrial districts, the development of storage units can provide businesses with additional space to store inventory and equipment, which may improve operations and efficiency. Additionally, the availability of storage units in commercial areas may help reduce clutter and improve the overall appearance of the district.

Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

The project is within the boundaries of the Canoga Park-Winnetka-Woodland Hills Community Plan, which was adopted on August 17, 1999. The Community Plan's area is consider the commercial hub of the West Valley. The project's consistency with the Community Plan is provided in Table 4.11-3, below.

Table 4.11-3. Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Consistency Analysis

Policy	Consistency Summary
Commercial	
Policy 2-1.1. Locate new commercial development in areas currently designated for such development.	**Consistent.** The Project includes development of a self-storage facility on a site that is designated General Commercial in the Community Plan.
Policy 2-2.1. Require that any proposed development be designated to enhance and be compatible with adjacent development.	**Consistent.** The Project Site is located along Ventura Boulevard that is primarily developed with commercial land uses (e.g., retail, restaurant, office, hotel, etc.). The Project Site is bound by the southwest corner of Clarendon Street ad Alhama Drive, south of Clarendon, west of Alhama Drive, north of Ventura Boulevard, and east of Canoga Avenue. The Project includes development of a self-storage facility and reconfiguration of an existing hotel on site, which is compatible with the adjacent land uses.

Table 4.11-3. Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Consistency Analysis

Policy	Consistency Summary
Policy 2-2.3. Preserve community character, scale and architectural diversity.	**Consistent.** The Project includes development of a six-story self-storage facility with loading areas and surface parking along Ventura Boulevard that is developed with a mix of primarily commercial/retail land uses. The project site is located in a commercial area that contains other structures of similar height, mass, and scale as the proposed development, including a six-story hotel building that would be located adjacent to the proposed project. The project would be subject to a design review by the City to ensure the proposed project would be consistent with the applicable elements of the City's General Plan, the Community Plan, and Municipal Code.
Policy 2-4.1. Ensure that commercial infill project achieve harmony with the best of existing development.	**Consistent.** The Project includes development of a six-story self-storage facility with loading areas and surface parking along Ventura Boulevard that is developed with a mix of primarily commercial/retail land uses. The project site is located in a commercial area that contains other structures of similar height, mass, and scale as the proposed development, including a six-story hotel building that would be located adjacent to the proposed project. The project would be subject to a design review by the City to ensure the proposed project would be consistent with the applicable elements of the City's General Plan, the Community Plan, and Municipal Code.
Recreational and Park Facilities	
Policy 4-1.1. Preserve the existing recreational facilities and park space.	**Consistent.** The project site is fully developed with a hotel, swimming pool, and parking lot. No recreational or park facilities are located on or near the project site nor would these facilities be impacted by the project.
Police Protection	
Policy 8-1.1. Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**Consistent.** The LAPD will be provided the IS/MND for review and comment. As discussed in response to Checklist Question XV(a)(ii), the Project would not result in any significant impacts related to police services.
Fire Protection	
Policy 9-1.1. Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**Consistent**. The LAFD will be provided the IS/MND for review and comment. As discussed in response to Checklist Question XV(a)(i), the Project would not result in any significant impacts related to fire protection services.

Table 4.11-3. Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Consistency Analysis

Policy	Consistency Summary
Transportation Demand Management	
Policy 11-1.1. Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).	**Consistent.** The project site is served by existing transit (Metro Routes 150, 150, and 601) and would encourage bicycling with the inclusion of 16 bicycle stalls for use by customers and employees. Sidewalks are provided on all of the surrounding streets and crosswalks are provided at all major intersections for use by customers and employees. In addition, the project would include measures in accordance with the Citywide Ordinance on Transportation Demand Management (TDM) per Section 12.26J of the Los Angeles Municipal Code.
Transportation System Management	
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.** As discussed in Section 4.17, Transportation, a trip generation analysis was conducted for the project (Appendix G) and determined the proposed project would generation 163 daily trips, 10 AM peak hour trips and 17 PM peak hour trips. The project is screened from conducting a project specific VMT analysis due to the minimal generation of daily trips and would not significantly impact regional and local transportation systems.
Policy 13-2.2. Driveway access points onto, arterial, and collector streets should be limited in number and be located to insure a smooth, and safe flow of vehicles and bicycles.	**Consistent.** Vehicular access to the entire project site would be provided by two new driveways, one on Clarendon Street for access to the self-storage site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. Two existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site. The self-storage and hotel sites will share emergency access internally through secure gated access. As discussed in Section 4.17, Transportation, implementation of the project would not impact any roadway or staging areas that are identified in any emergency planning documents and would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
Parking	
Policy 15-1.3. New parking lots and new parking garages shall be developed in accordance with design standards.	**Consistent.** The project site will be developed in accordance with all applicable laws and regulations. In addition, the site plans would undergo a detailed review by the City prior to the issuance of the necessary building permits.

Zoning Code

The City's zoning regulations are published in Chapter 1 of the City's Municipal Code and regulate how land can be developed. The project site is currently zoned C4-1LD (Commercial Zone, Height District 1L, Development Limitations), and P-1LD (Automobile Parking Zone, Height District 1L, Development Limitations). The project includes a request for a discretionary approval of a Zone Change and Height District Change from C4-1LD and P-1LD to C2-2, which would allow for the height of the self-storage building to be 80 feet 4 inches from grade to top of the roof structure. In addition, the project would have a FAR of 3.54:1 (3.69:1 after dedication), a five (5) feet landscape buffer pre dedication (zero feet with dedication) along Clarendon Street on the self-storage facility and a 3-foot buffer pre dedication and zero feet after the dedication between the surface parking lot of the hotel and the street in lieu of the required 10 foot buffer along Alhama Drive, and a maximum height of 80 feet 4 inches. As such, the Project would require Specific Plan Exceptions pursuant to Section 11.5.7 F of the LAMC.

The related discretionary approvals that would be required for project implementation are:

- Zone Change and Height District Change, pursuant to LAMC Section 12.32 Q, from the existing C4-1LD and P-1LD to C2-2;
- Specific Plan Exceptions from the Ventura/Cahuenga Boulevard Corridor Specific Plan, to allow the construction of a commercial building with:
- Self-Storage Structure
    - 112,204 square feet of floor area in lieu of 40,819 square feet or a 3.54:1 FAR (3.69:1 after dedication) in lieu of a 1.25:1 FAR permitted in Section 6.B.1.a;
    - 80 feet 4 inches in height in lieu of 45 feet as permitted in the Specific Plan Section 7.E 1.e.3; and,
    - 5 feet landscape buffer pre dedication or zero feet after dedication in lieu of 10 feet as permitted in the Specific Plan Section 7.D 1.b;
- Hotel (Existing)
    - 3 feet landscape buffer pre dedication or zero feet after dedication in lieu of 10 feet as permitted in the Specific Plan Section 7.D 1.b; and,
    - 99 parking spaces in lieu of 134 parking spaces as permitted in the Specific Plan Section 7.F.1.d;
- Pursuant to Los Angeles Municipal Code Section 11.5.7 C, and Section 9 of the Ventura/Cahuenga Boulevard Corridor Specific Plan, a Specific Plan Project Permit Compliance Review to permit the construction of a storage facility with two associated office and retail spaces,
- Conditional Use Permit, pursuant to LAMC Section 12.24 W.50 to allow for the development of a storage building for household goods within 500 feet of a residential use;
- Conditional Use Permit, pursuant to LAMC Section 12.24 S to allow up to 20 percent parking reduction otherwise required by the Code;
- Pursuant to Los Angeles Municipal Code Section 16.05, a Site Plan Review for a development project resulting in a net increase of 50,000 square feet of nonresidential floor area; and,
- Pursuant to Los Angeles Municipal Code Section 17.50, a Preliminary Parcel Map for the subdivision of One (1) lot into two (2) lots.

All other aspects of the project would comply with the zoning code. For these reasons, the project would be substantially consistent with the zoning code.

Ventura-Cahuenga Boulevard Corridor Specific Plan

The purpose of this Specific Plan is to assure an equilibrium between the transportation infrastructure and the land use development with the Plan's Corridor and within each community of the Specific Plan area. In addition, the Specific Plan provides building and site design guidelines, balances commercial land uses, preserve and enhance community aesthetics, and provides community development limitations.

According to Section 3 of the Specific Plan, "the regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of LAMC Chapter I, as amended, and any other relevant ordinances and do not convey any rights not otherwise granted under the provisions and procedures contained in that chapter and other relevant ordinances, except as specifically provided here. Wherever the Specific Plan contains provisions that require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements, or other greater restrictions or limitations on development than would be allowed pursuant to the provisions contained in LAMC Chapter I, the Specific Plan shall prevail and supersede the applicable provisions of that Code. The procedures for the granting of a Specific Plan Exception, Project Permit Compliance, Appeal, Modification of Permit Compliance, and Project Permit Adjustment to and Interpretation of the Specific Plan are set forth in LAMC Section 11.5.7. In approving an amendment to this Specific Plan, pursuant to Section 11.5.7 F, the Area Planning Commission, and the City Council on appeal, may simultaneously approve any conditional use under their jurisdiction."

Based on a strict interpretation of the Specific Plan, the project is consistent with all the building limitations and land use regulations applicable to development of the Project Site, except for the minimum landscape buffer requirements, the maximum building height, increase in the maximum FAR, and decrease hotel parking spaces, as described above. As such, the project requires exceptions to the Specific Plan, pursuant to California Government Code Section 65453 and LAMC Section 11.5.7 F, as noted above. With the requested entitlements, the project would be substantially consistent with the Specific Plan, and project impacts related to consistency with the Specific Plan would be less than significant.

Therefore, for the reasons outlined above, the proposed project would not cause a significant environmental impact due to a conflict with and land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect. As such, impacts would be less than significant.

Cumulative Impacts

All related projects would be required to undergo environmental review on a case-by-case basis in accordance with the requirements of CEQA and the City. Each Related Project would also be required to demonstrate consistency with all applicable planning documents governing the project site, including the City's General Plan and the Zoning Ordinance, and any applicable Specific Plans. Should potential impacts be identified, appropriate mitigation would be prescribed that would likely reduce potential impacts to less-than-significant levels. Therefore, the proposed Project would not result in a cumulatively considerable impact related to land use.

4.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – 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) Would the project 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?

Less-than-Significant Impact. According to the California Department of Conservation, the Project site is within an MRZ-1, MRZ-2, or MRZ-3 meaning significant mineral deposits or likelihood of significant mineral deposits exist; however, the significance of the deposit is undetermined (California Department of Conservation 2021).

The project site is located in an urbanized portion of the City and is bound by existing residential, commercial, and industrial development in all directions. Mineral resource mining is not a compatible use with these land uses. The project site is not large enough to effectively extract mineral resources. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the project area, potential significant mineral resources within the project area are considered unavailable for extraction. Therefore, impacts associated with mineral resources would be less than significant.

b) Would the project 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?

Less-than-Significant Impact. Refer to the response provided in Section 4.12(a).

Cumulative Impacts

Both the Project Site and the Related Projects are located on developed land within an urbanized part of the City. The Project would not result in the loss of minerals and therefore, no cumulative impacts related to mineral resources would occur.

4.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – 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 and analysis presented below are based primarily on the following (refer to Appendix F):

- Noise Study Technical Memorandum, prepared by Dudek, March 2023.

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

Less Than Significant Impact. Noise-generated by the Project would include short-term, on-site construction noise; off-site traffic noise along local roadways in the Project Area; and on-site mechanical noise from heating, ventilation, and air conditioning (HVAC) equipment. A Noise and Vibration Technical Assessment is included as Appendix F of this document.

Short-Term Construction Impacts

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor.

Equipment that would be in use during construction would include, in part, graders, backhoes, concrete saws, rubber-tired dozers, loaders, cranes, forklifts, cement mixers, pavers, rollers, and air compressors. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 4.13-1. Note that the equipment noise levels presented in Table 4.13-1 are maximum

noise levels. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 4.13-1. Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (dBA at 50 Feet)
Air compressor	81
Backhoe	85
Concrete pump	82
Concrete vibrator	76
Crane	83
Truck	88
Dozer	87
Generator	78
Loader	84
Paver	88
Pneumatic tools	85
Water pump	76
Power hand saw	78
Shovel	82

Source: FHWA 2006.
Notes: dBA = A-weighted decibels.

The maximum noise levels at 50 feet for typical construction equipment would be 88 dBA for the equipment typically used for this type of development project, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance. Project construction would take place both near and far from adjacent, existing noise-sensitive uses. For example, construction near the southern Project boundary would take place within approximately 30 to 40 feet of the Courtyard by Marriott property line, but during construction of other Project components, construction would be further away from noise-sensitive receptors. Most construction activities associated with the Project would occur at distances of approximately 100 feet or more from existing noise-sensitive land uses, which represents activities both near and far from any one receiver, as is typical for construction projects.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. No topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Using the FHWA RCNM and construction information, prediction results are summarized in Table 4.13-2 at the nearest noise-sensitive receiver (the hotel property line to the south of the project site). An "acoustic

centroid" approach akin to the FTA general assessment technique for estimating construction noise was utilized, whereby all listed equipment for a construction phase is represented by a common location at the geographic center (with successive pieces of equipment further afield) of the studied construction zone or area with the exception of a single loudest operating piece of equipment associated with the studied construction phase to be as close as the aforementioned 30 feet nearest distance to the nearest noise sensitive receptor for no more than a single hour during the 8-hour work shift over which the L_{eq} value for the entire phase is quantified.

This approach conservatively considers a "worst-case" scenario, where the loudest equipment piece for the phase is much closer to the nearest noise sensitive receptor than its distance to the acoustic centroid. An example of such a scenario would be during the Project's site grading phase, where a grader might make several passes at this nearest perpendicular distance to the sensitive receptor location, but is otherwise very distant. For purposes of this construction noise assessment, such moments when this nearest equipment proximity occurs up to a cumulative time not greater than one hour per 8-hour period.

Attachment B of Appendix F displays the construction noise model worksheets used in the analysis. Although the quantities and types of equipment per construction phase are the same in each of the two approaches, due primarily to the differences in source-to-receptor distance variables, predicted levels for the acoustic centroid methodology is lower.

Table 4.13-2. Predicted Construction Noise Levels

Construction Phase	Construction Noise Level at Nearest Receptor (~30 ft to property line) (L_{eq} dBA)	Construction Noise Level at 50' (L_{eq} dBA) per LAMC Section 112.05	Compliant with LAMC Section 112.05?
Demolition	75.4	74.8	Yes
Site Preparation	75.2	73.0	Yes
Grading	75.1	73.8	Yes
Building Construction	73.3	71.2	Yes
Paving	75.2	73.4	Yes
Architectural Coatings	64.1	61.9	Yes

Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel.

As presented in Table 3,13-2 the construction noise levels are predicted to be as high as 75 dBA L_{eq} at the nearest noise sensitive land use when construction activities take place near the southernmost Project boundary, approximately 30 feet away. Note that these estimated noise levels would only occur as heavy equipment is operated along the southern Project boundary, which will take place for a relatively short portion of the overall construction period. On an average construction workday, heavy equipment will be operating sporadically throughout the Project Site and more frequently away from the southernmost edge of the site.

As also shown in Table 3,13-2 at a reference distance of 50 feet, noise levels from construction equipment would not exceed a noise level of 75 dBA L_{eq} and thus would be in compliance with LAMC Section 112.05.

Although nearby off-site noise sensitive receptors would be exposed to elevated construction noise levels, the increased noise levels would typically be relatively short term. It is anticipated that construction activities

associated with the Project would take place primarily within the allowable hours of the City of Los Angeles (7:00 a.m. and 9:00 p.m. Monday through Friday, 8:00 a.m. and 6:00 p.m. on Saturday), and would not occur at any time on Sunday or on federal holidays. In the event that construction is required to extend beyond these times, an extended hours permit would be required and would be obtained by the Applicant.

Without an adequate barrier between the construction equipment operating on the Project Site and the nearby residential uses, construction noise levels would be substantially higher than existing ambient daytime noise levels, particularly for the construction activities in proximity to the nearest adjacent noise-sensitive receivers (as shown in Table 4.13-1). In addition to the City's established requirement mandating that no construction activity that might create loud noises in or near residential areas or buildings shall be conducted between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturdays, or at any time on Sundays or federal holidays, the Project Applicant has committed to adhere to the following and implement the following standard construction Best Management Practices (BMPs) to minimize temporary increases in noise levels due to the intermittent operation of construction equipment:

Prior to commencement of construction activities involving heavy equipment, temporary construction noise barriers will be constructed at the Project Site's southern property boundary. The noise barriers will be a minimum of eight feet in height, have a surface density of at least four pounds per square foot, and be free of openings and cracks (with the exception of expansion joints gaps and other construction techniques, which could create an opening or crack).

Residences surrounding the construction site will be notified of the construction schedule in writing at least five calendar days prior to construction. The construction contractor will designate a point of contact who will be responsible for responding to complaints regarding construction noise. The point of contact will determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance point of contact will be conspicuously placed on construction site fences and written into the construction notification schedule sent to nearby residences.

Staging of construction equipment shall not occur within 50 feet of any noise- or vibration-sensitive land uses.

All noise-producing equipment and vehicles using internal combustion engines should be equipped with mufflers; air-inlet silencers, where appropriate; and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) should be equipped with shrouds and noise control features that are readily available for that type of equipment.

All mobile or fixed noise-producing equipment used on the Project facilities that are regulated for noise output by a local, state, or federal agency should comply with such regulation while in the course of Project activity.

Idling equipment should be kept to a minimum and moved as far as practicable from noise-sensitive land uses.

Electrically powered equipment should be used instead of pneumatic or internal-combustion-powered equipment, where feasible.

Material stockpiles and mobile equipment staging, parking, and maintenance areas should be located as far as practicable from noise-sensitive receptors.

The use of noise-producing signals, including horns, whistles, alarms, and bells, should be for safety warning purposes only.

The effectiveness of these standard construction best management practices would vary but is estimated to achieve a reduction of 10 or more decibels (which subjectively would be perceived as a substantial change). The range of effectiveness would vary based on the equipment in use, the original condition of the equipment, the specific location of the noise source and receiver, etc. Collectively, these standard practices would result in a substantial decrease in construction noise. Also as shown in Table 4.13-3, with implementation of the BMPs listed above, construction equipment noise would not exceed 75 dBA L_{eq} at 50 feet, and therefore would comply with the LAMC Section 112.05 restrictions on construction equipment noise levels. Therefore, noise from on-site construction activities would be less than significant. Therefore, in relation to the existing noise environment and existing standards, the impact from construction noise would be less than significant.

Table 4.13-3. Predicted Construction Noise Levels with and without Implemented BMPs

Construction Phase	Construction Noise Level at 50' (L_{eq} dBA) per LAMC Section 112.05 without BMPs	Construction Noise Level at 50' (L_{eq} dBA) per LAMC Section 112.05 with BMPs
Demolition	74.8	64.8
Site Preparation	73.0	63.0
Grading	73.8	63.8
Building Construction	71.2	61.2
Paving	73.4	63.4
Architectural Coatings	61.9	51.9

Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel.

Long-Term Operational Impacts

Long-term operational noise associated with the Project includes noise from Project-generated traffic and from HVAC equipment associated with the Project's leasing office. Each of these is addressed below.

Off-Site Traffic Noise Levels

As further discussed in the traffic generation memorandum prepared for the Project (Appendix F), the Project is expected to generate only a modest number of daily vehicle trips, primarily limited to cars and small trucks intermittently throughout daytime and evening hours as the self-storage facility's customers transport household goods to and from the Project Site. According to the traffic study, the Project will generate an estimated 163 net new[36] daily trips, ten net new a.m. peak hour trips, and 17 net new p.m. peak hour trips. Under the existing conditions, roadway segments in the Project's study area (specifically Ventura Blvd.) carry up to an estimated 1,742 trips during the a.m. peak hour (8 a.m. to 9 a.m.) and an estimated 2,458 trips during the p.m. peak hour (5 p.m. to 6 p.m.) (LADOT 2022). Thus, the Project-related vehicle trips would represent a nominal incremental increase in traffic volumes in the Project area.

[36] Net new trips refers to the difference between the trips generated by the project and the trips generated by the existing uses on-site.

Typically, a doubling of the energy of a noise source, such as a doubling of traffic volume, would increase noise levels by 3 dBA.[37] Given that it would result in only a modest increase in traffic volumes on local roadways, the Project is not expected to result in an increase of 3 dBA or greater on roadways in the study area. The change in noise levels due to the Project would not be audible. Therefore, impacts associated with Project-generated traffic noise would be less than significant.

On-Site Mechanical Noise Levels

Rooftop HVAC

Based on the available architectural plans and other design information for the proposed Project, there are a number of HVAC units expected on the roof of the Project building. Rooftop HVAC reference sound levels were calculated from a combination of inputs that include the gross square footage values for the Project commercial land uses, Project applicant response to data requests, and manufacturer sound power level data.

Sound Propagation Prediction

The aggregate noise emission from these outdoor-exposed HVAC sound sources has been predicted with the Datakustik CadnaA sound propagation program. CadnaA is a commercially available software program for the calculation, presentation, assessment, and prediction of environmental noise based on algorithms and reference data per International Organization for Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: General Method of Calculation" (ISO 1996). The CadnaA computer software allows one to position sources of sound emission in a simulated three-dimensional (3-D) space atop rendered "blocks" of Project building masses having heights and footprints consistent with Project architectural plans and elevations. In addition to the above-mentioned sound source inputs and building-block structures that define the three-dimensional sound propagation model space, the following assumptions and parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 0.1, which intends to represent an average or blending of ground covers that are characterized largely by hard reflective pavements and existing building surfaces across the Project site and the surroundings;
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces such as the modeled building masses;
- Calm meteorological conditions (i.e., no wind) with 68 degrees Fahrenheit and 50% relative humidity; and
- For purposes of impact assessment as evaluated herein, all of the modeled HVAC equipment are operating concurrently and continuously for a minimum period of 1 hour.

Table 4.13.4 presents the predicted aggregate noise level exposures from these operating HVAC systems at each of three (3) nearby offsite noise-sensitive receptors (i.e., existing hotel outdoor land uses, at positions akin to those studied for roadway traffic noise in the preceding narrative). Predicted levels shown in Table 4.13-4 range between 3 to 20 dBA hourly L_{eq}, below the City's noise ordinance, which prohibits an increase of greater than 5 dBA over ambient measured levels. The reason for these low predicted HVAC noise levels is due to the high rooftop positions of the equipment surrounded by a tall and solid parapet that occludes both sight and sound.

[37] Under normal circumstances (non-laboratory settings), a 3-dBA increase in noise levels is considered to be to smallest increase that is audible to the human ear; whereas a less than 3-dBA increase in noise levels is considered to be a barely or non-audible increase.

Table 4.13-4. Stationary Operations Noise Modeling Results

Studied Noise Sensitive Receptor	Location	Predicted Project Attributed HVAC Noise Exposure Level (dBA Leq)
R1	Courtyard by Marriott facade	19.7
R2	Adjacent to the Park Ventura Senior Living facility	10.7
R3	Adjacent to the residence at 21115 Costanso St.	3.1

Source: Dudek 2022
Notes: Leq = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels.

Therefore, stationary operations related to rooftop HVAC noise would be considered a less than significant impact.

Project construction would not result in a substantial permanent, temporary, or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Construction of the Project would include implementation of standard construction practices to minimize a temporary increase in noise levels due to the intermittent use of construction equipment. These standard practices would result in a substantial decrease in construction noise. Therefore, impacts associated with a substantial temporary or periodic increase in ambient noise levels would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2013). Information from Caltrans indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inch/second begin to cause annoyance. Heavier pieces of construction equipment, such as bulldozers, have peak particle velocities of approximately 0.089 inch/second or less at a distance of 25 feet (DOT 2006).

Groundborne vibration typically attenuates over short distances. At the distance from the nearest noise sensitive land use (the Courtyard by Marriott) to the southern Project boundary (approximately thirty feet) and with the anticipated construction equipment, the peak particle velocity would be approximately 0.35-inch/second. At the closest sensitive receptors, vibration levels could temporarily approach the vibration threshold of potential annoyance of 0.1 inch/second; however, these vibration impacts would only occur intermittently during construction activities right on the southern property line. Under real-world conditions, equipment would operate throughout the construction site using different power levels, which minimize the vibration-induced annoyance experienced at the nearest residential receivers.

Construction can also affect nearby buildings by inflicting damage from vibration. However, construction vibration associated with this Project would not result in structural building damage. Building damage typically occurs at vibration levels of 0.5 inch/second or greater for buildings of reinforced-concrete, steel, or timber construction. The heavier pieces of construction equipment used for this Project would include backhoes, front-end loaders, and flat-bed trucks. Pile driving, blasting, or other special construction techniques would not be used for construction of the Project; therefore, excessive groundborne vibration and groundborne noise with the potential to adversely affect nearby buildings would not be generated. Once operational, the Project would not generate groundborne vibration. As such, no building damage

would be expected to occur as a result of Project-related vibration during construction or operation and impacts 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 within an airport land use planning area or within two miles of a public airport or public use airport (Los Angeles County Department of Regional Planning 2009). There are no general aviation airports or airstrips in the vicinity of the Project Site. The closest airport is Van Nuys Airport, which is located over six miles northeast of the Project Site. Any overhead air traffic noise above the Project Site would occur at heights where there is little possibility to expose construction workers or employees and customers of the self-storage facility to excessive aircraft noise levels. Therefore, no impacts associated with public airport noise would occur. No private airstrips are located within ten miles of the City (AirNav.com 2019). Therefore, no impacts associated with private airstrip noise would occur.

Cumulative Impacts

The Project would have less than significant impacts related to construction and operation noise and vibration impacts. Each of the three (3) related projects are 0.8 miles from the proposed Project. Due to this distance and uncertainty of construction timing, existing urban development, and the Project's less than significant noise impacts, development of cumulative projects would not result in an increase in ambient noise levels above a level of significance. As such cumulative noise impacts would be less than significant.

4.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – 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) Would the project 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 would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the project area. The temporary workforce would be needed to construct the proposed self-storage building and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction but will likely average a few dozen workers at any given time throughout the workday. These short-term positions are anticipated to be filled primarily by workers who reside in the project area vicinity. Therefore, construction of the project would not generate a permanent increase in population within the project area.

During operations, the project would generate a minimal number employees. According to the Southern California Association of Governments (SCAG), employment in the City is anticipated to increase from 1,899,500 in 2020 to 2,104,100 in 2035 (SCAG 2016). The proposed project would represent a nominal contribution to the anticipated employment growth in the City.

Additionally, as of September 2022, the California Employment Development Department found that the unemployment rate in Los Angeles County was approximately 4.5 percent (EDD 2022). Therefore, the project's temporary and permanent employment demands would likely be met by City's existing labor force and would not create a demand for people to move to the City. As such, the project would not stimulate population or employment growth beyond what is forecasted in local and regional plans. Therefore, impacts associated with population growth would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently developed commercial and parking space. Development of the project would not result in displacement of existing households. However, assuming that employee relocation occurred in the project area, vacant housing opportunities are available within the City and surrounding area. The City has approximately 1,526,672 housing units with a vacancy rate of 6.6 percent (DOF 2022), or approximately 100,760 vacant housing units. Given the availability of housing opportunities within the City, it is assumed that there are sufficient housing opportunities in the area for existing residences, and there would not be a need for new construction or replacement of housing elsewhere. Therefore, there would be **no impact** associated with housing.

Cumulative Impacts

Cumulatively, population growth in the City has the potential to result in significant environmental impacts. The City planning documents, such as the General Plan have been prepared to be consistent with the population forecasts identified for the region. As mentioned above, the proposed Project not expected to cause significant population growth. Employees are anticipated to be current residents of the City. As such, impacts related to population and housing would not be cumulatively considerable.

Additionally, any future development would be required to comply with applicable federal, state, and local regulations related to population and housing. Required compliance with these regulations would ensure

impacts related to population and housing would be less than significant. Therefore, impacts related to population and housing would not be cumulatively considerable.

4.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

a) ***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:***

Fire protection?

Less-Than-Significant Impact. Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.09.07, the maximum response distance between a high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is x miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.

The City Los Angeles, community of Woodland Hills-Warner Center has available fire protection services from other area agencies such as the neighboring communities of Canoga Park, West Hills, and Winnetka. The Canoga Park Station No. 72 (6811 De Soto Ave.) is approximately 2.3 miles, the West Hills Fire Station No. 105 (6345 Fallbrook Ave.) is approximately 3 miles, and the Winnetka Fire Station No. 104 (8349 Winnetka Ave.) is approximately 5.4 miles from the Project site (Los Angeles Fire Department 2022).

The closest fire station to the project is City of Los Angeles Department Station No. 84 (21050 Burbank Blvd.), located approximately 1 mile north of the Project site (Los Angeles Fire Department 2022). Considering the proximity of the project site to Station No. 84, the project could be adequately served by

the various neighboring community's fire departments without adversely effecting personnel-to-resident ratios, response times, or other performance objectives. In addition, the proposed building would be required by the City to include a fire sprinkler system.

In addition, the project would not directly or indirectly induce population growth in the City. Although the project could potentially result in a slight, incremental increase in calls for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new fire station facilities. Nonetheless, similar to other development projects in the City, the project applicant would still be required to pay their fair share of development impact fees to help offset incremental impacts to fire protection services.

All ingress/egress associated with the Project would be designed and constructed in conformance with all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Thus, the Project would not result in any significant impacts related to emergency access. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these requirements, Project impacts related to fire protection services would be less than significant.

Police protection?

Less-than-Significant Impact. The City of Los Angeles Police Department (LAPD) police protection to the Woodland Hills community, including the Project site (LAPD 2022). The LAPD has one community police station in the nearby community Canoga Park, located at 21501 Schoenborn Street, approximately 4.2 miles northwest of the Project site.

The project would not directly or indirectly induce population growth in the City. While the project would potentially result in a slight, incremental increase in calls to the LAPD for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new LAPD facilities. In addition, the project site is already located within LAPD's service area and would not require an expansion of service area, which could otherwise result in longer response time. Overall, it is anticipated that the project would be adequately served by existing LAPD facilities, equipment, and personnel.

The project would increase the need for police protection services at the project site. However, in accordance with the City's Standard Condition of Approval, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. Security features that would be included as part of the Project include, but are not limited to, the following:

- Fencing
- 24-hour video surveillance
- Electronic gate and door access
- Restricted interior access
- Security lighting
- Anti-graffiti paint

These measures for the project shall be approved by the LAPD prior to the issuance of building permits.

Nonetheless, similar to other development projects in the City, the project applicant would still be required to pay their fair share of development impact fees to help offset incremental impacts to police protection services. Therefore, impacts associated with LAPD facilities and response times would be less than significant. In addition, the applicant will be required to follow the City of Los Angeles Development Impact Fee Ordinance (Fee Ordinance). The Fee Ordinance requires the applicant submit a fee payable to the City which will apply to the funding of public facilities, including law enforcement facilities. Through compliance with the requirements of the LAPD and inclusion of the proposed security features, project impacts related to police protection services would be less than significant.

Schools?

No Impact. The Project would employ a nominal number of individuals. The types of jobs associated with the Project could be filled by people already living in the project area and surrounding communities. The project would not create such an increase in employment that would cause a substantial number of new people (with school-age children) to move to the Project Site area and surrounding communities to fill the employment positions.

The project site is located within the Los Angeles Unified School District. It is not anticipated that people would relocate to the City as a result of the project, and an increase in school-age children requiring public education is not expected to occur as a result of the project. Nonetheless, all residential and non-residential development projects are subject to SB 50, which requires payment of mandatory impact fees to offset any impact to school services or facilities. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local laws (Government Code Section 65996). In accordance with SB 50, the project applicant would pay its fair share of impacts fees based on the number/type of dwelling units. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, no impacts associated with school facilities would occur.

Parks?

No Impact. Given the lack of population growth as a result of the project, neither construction nor operation of the project would generate new residents to the extent that new or expanded park facilities would be required. Therefore, no impacts associated with park facilities would occur.

Other public facilities?

No Impact. The project would not directly or indirectly induce substantial population growth in the City. As such, it is unlikely that the project would increase the use of other public facilities such as libraries. Therefore, no impacts associated with libraries and other public facilities would occur.

Cumulative Impacts

As discussed above, fire and sheriff service impacts related to the proposed Project would be less than significant. In addition, that the proposed Project would not increase demand for local schools, parks, or public facilities. Thus, the Project would not cumulatively combine with related projects to have an impact

on these facilities. Furthermore, cumulative projects would also be required to undergo environmental review, in compliance with the requirements of CEQA. Should potential impacts to public services be identified, appropriate mitigation would be prescribed that would reduce impacts to less-than-significant levels. Because the Project would not create a significant impact on public services, and the other Related Projects would also be expected to avoid or mitigate impacts on public services thus, cumulatively significant impacts are anticipated to be less than significant.

4.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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 facility would occur or be accelerated?***

No Impact. The project would construct a new self-storage building and associated improvements. The project does not propose any residential uses and would not directly or indirectly result in a substantial and unplanned increase in population growth within the project area. As such, the project would not increase the use of existing neighborhood parks or regional parks in the City and surrounding area. Therefore, no impacts associated with the use of existing residential facilities would occur.

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?***

No Impact. The project would construct a new self-storage building and associated improvements. The project does not propose any recreational facilities. As a commercial use, the project would not require the construction or expansion of recreational facilities. Therefore, no impacts associated with the construction of new or expansion of existing recreational facilities would occur.

Cumulative Impacts

The proposed Project would not have impacts related to recreational facilities. It is anticipated that because the three (3) Related Projects are in an already developed, urbanized area of the City, they would also not result in impacts to recreational facilities. As such, cumulative impacts to recreational facilities would be less than significant.

4.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – 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 or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
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?	☐	☐	☒	☐

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The project site is surrounded by U.S. Highway 101 and Clarendon Street to the north, office and commercial uses to the west, and Alhama Drive to the east (see Figure 1, Project Location). The project site is within the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan of the City's General Plan. A description of the nearby roads serving the site is provided below.

- Comerico Way is a north-south two-lane local street between Ventura Boulevard to the south and Claredon Street to the north. Sidewalks are provided on both sides of the street.
- Clarendon Street is an east-west two-lane local road connecting with Comercio Way to the west and Paralta Avenue on the east. Sidewalks are provided on both sides of the street. Access to the site is proposed from an exiting driveway on Clarendon Street.
- Ventura Boulevard is an east west designated Boulevard II in the City's Mobility Plan 2035. It is also part of the Ventura/Cahuenga Boulevard Corridor Specific Plan. Sidewalks are provided on both sides of the street.
- Alhama Drive is a north-south collector between Claredon Street to the north and Ventura Boulevard to the south. Sidewalks are provided on both sides of the street.

Transit service in Woodland Hills is provided by the Los Angeles County Metropolitan Transportation Authority (Metro), which operates Metro Rail, Metro Liner, and Metro Bus systems throughout the region and LADOT Transit. The closest routes to the site are Metro Routes 244, 150, and 601, and LADOT Transit Route 423, with service on Ventura Boulevard. Metro Route 244 travels northbound/southbound connecting Woodland Hills, Warner Center, West Hills, Canoga Park and Chatsworth, with service provided weekdays between 4:42 AM and 9:52 PM. Weekend and holiday service is provided between 5:12 AM and 8:52 PM[38]. Metro Route 150 travels eastbound/westbound connecting Encino, Tarzana, Woodland Hills, Warner Center, Canoga Park and Chatsworth, with service provided weekdays between 4:37 AM and 11:35 PM. Weekend and holiday service is provided between 4:41 AM and 11:35 PM.[39] Metro Route 601 travels westbound/eastbound connecting Burbank, Woodland Hills, and Canoga, with service provided weekdays between 4:46 AM and 11:39 PM. Weekend and holiday service is provided between 4:49 AM and 11:39 PM. The nearest bus stop serving the Metro routes are located near the intersection of Ventura Boulevard and Alhama Drive.

LADOT Commuter Express Route 423 provides express service between Thousand Oaks, Westlake Village, Agoura Hills, Calabasas, Woodland Hills, Encino and Downtown Los Angeles. Route 423 also runs along Ventura Boulevard. However, as an express route, stops are limited and the nearest bus stop to the site is located near the intersection of Ventura Boulevard and Topanga Canyon Boulevard, approximately 0.75 miles west of the site.[40]

Sidewalks are provided on all of the surrounding streets and crosswalks are provided at all major intersections. There are no existing bicycle facilities in the vicinity of the site, and none are currently proposed. The project includes 16 long-term and 16 short-term bicycle parking spaces for use by customers and employees of the self-storage facility.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. In August 2019, LADOT published an update to its transportation analysis guidelines, in part, to conform to the requirements of Senate Bill 743 and the updated CEQA guidelines proposed by the Governor's Office of Planning and Research (OPR). Consequently, the City's transportation impact thresholds have been updated to be consistent with the VMT impact methodology. Based on the City's Guidelines, a project may be screened from conducting a detailed project-level VMT assessment if the answer is no to either T-2.1-1 or T-2.1-2 identified below.

- **T-2.1-1:** Would the land use project generate a net increase of 250 or more daily vehicle trips?
- **T-2.1-2:** Would the project generate a net increase in daily VMT?

A trip generation analysis was conducted for the project (Appendix G). Trip generation estimates for the proposed project were based on daily and AM and PM peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Handbook, 11th Edition* (2021). As show in Table 4.17-1 below, the proposed project would generation 163 daily trips, 10 AM peak hour trips and 17 PM peak hour trips.

38 Metro. 2022. 244 Metro Local Line
39 Metro. 2022. 150 Metro Local Line
40 LADOT. 2022. Commuter Express 423 | LADOT Transit

Table 4.17-1. Project Trip Generation

Land Use	ITE Code	Size	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Mini-warehouse	151	per TSF	1.45	0.05	0.04	0.09	0.07	0.08	0.15
Trip Generation									
Woodland Hills Self-storage	151	112.204 TSF	163	6	4	10	8	9	17

Notes: TSF = thousand square feet
[1] Trip rates from Trip Generation, 11th Edition, Institute of Transportation Engineers, 2021.

As such, the project falls below the City's threshold of generating a net increase of 250 or more daily vehicle trips. Therefore, the project is screened from conducting a project-specific VMT analysis, and would not conflict with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

c) Would the project 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. The proposed project involves the development of a self-storge building and associated improvements. The project does not include new roadway design, nor does it include a new land use or features that would substantially alter the existing traffic patterns in the area. The project does not include any improvements that would extend into the public right-of-way or interfere with existing public transit or pedestrian facilities. The project site would continue to be adequately served by existing surrounding roadway infrastructure under project conditions. All on-site uses, including vehicle and pedestrian circulation would be typical of such a development, and no incompatible uses or equipment is proposed. Therefore, impacts regarding increases in hazards due to geometric design features or incompatible uses would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The project site would be served by a driveway located on the northwest corner of the site. There would also be an emergency access gate located to the east of west of the storage building that would provide access to the hotel's parking lot and driveways to the south. According to the City's General Plan, the Los Angeles Emergency Operations Plan (EOP) governs the operations of the City during a disaster. This plan addresses response to small to large scale emergency situations associated with natural disaster or human-caused emergencies (City of Los Angeles 2018). The project would be required to abide by all standards set forth in the Los Angeles EOP. Implementation of the project would not impact any roadway or staging areas that are identified in any emergency planning documents and would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, all project components would be constructed in compliance with the California Fire Code. Therefore, impacts related to emergency access would be less than significant.

Cumulative Impacts

As discussed above, the Project the project falls below the City's threshold of generating a net increase of 250 or more daily vehicle trips. Therefore, the project is screened from conducting a project-specific VMT analysis, and would not conflict with CEQA Guidelines Section 15064.3, subdivision (b). in addition, the Project would not substantially increase a hazard or result in inadequate emergency access. For these reasons, the Project's contribution to cumulative traffic impacts would not be significant and cumulative traffic impacts would be less than significant.

4.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The evaluation of potential impacts to Tribal Cultural Resources is based on the findings resulting from tribal consultation conducted by the City as the lead agency, as well as the findings of the Archaeological Resources Assessment Report prepared by Dudek in January 2023 (Appendix C) and the results of the AB-52 Consultation completed by the City (Appendix I).

Assembly Bill 52

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation

requirements for the lead agency. PRC Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A tribal cultural resource (TCR) is either:

- On the CRHR or a local historic register;
- Eligible for the CRHR or a local historic register; or
- 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 PRC Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report by contacting those tribal groups who have previously provided formal written request for notification of projects under the agency's jurisdiction.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2[a]). Finally, the environmental document, for which the tribal consultation is focused, and the mitigation monitoring and reporting program (where applicable), developed in consideration of information provided by tribes during the formal consultation process, shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Assembly Bill 52 Consultation

The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent letters by the City in March 2023. The notification letters contained a Project description, outline of AB 52 timing, an invitation to consult, a Project site plan, and contact information for the appropriate lead agency representative.

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) 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)?

No Impact. Implementation of the proposed project would not involve the demolition of any historic resources. The project site is not identified by the City as a historic resource in the Los Angeles Historic Resources Inventory (Historic Places LA 2023) or is subject to Historic Preservation Review. Therefore, no impacts related to this issue would occur.

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.

Less-than-Significant Impact. The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications. The Fernandeño Tataviam Band of Mission Indians (FTBMI) and the Gabrieleño Band of Mission Indians – Kizh Nation provided responses to the AB 52 consultation request. It was noted by the FTBMI that the site itself is categorized as having low sensitivity, however, Tribal Cultural Resources have been found in the area near the proposed Project. As discussed in Section 4.5, no previously recorded archaeological resources of Native American origin or tribal cultural resources listed in the CRHR or a local register were identified within the proposed project site as a result of the NAHC SLF search. Although unlikely, it is possible that unknown tribal cultural resources could exist at the project site that could be encountered. As such, the Project would be required to implement Mitigation Measures TCR-1 through TCR-7, in addition to MM-CUL-1 through MM-CUL-3, to ensure appropriate treatment of potential unknown tribal cultural resources. Compliance with these mitigation measures would ensure that Project impacts related to tribal cultural resources would be less than significant.

Mitigation Measures

To ensure that the project would not result in any significant impacts related to tribal cultural resource, the following mitigation measures would be implemented:

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground

disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-4: If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-footbuffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards, retained by the Project Applicant, 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 about 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, to provide Tribal input with regards to significance and treatment.

A. Should the find be deemed significant, as defined by CEQA (as amended, 2015), 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.

TCR-5: 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.

TCR-6: The City and/or Project Applicant shall, in good faith, consult with the Consulting Tribes on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities. The Consulting Tribes may retain all discovered TCRs in the form and/or manner the Consulting Tribes deems appropriate, at the Consulting Tribe’s sole discretion, and for any purpose the Consulting Tribes deem appropriate, including for educational, cultural and/or historic purposes.

TCR-7: Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, and the County Coroner shall be contacted. If the human remains are determined to be Native American in origin by the County Coroner, the Project Applicant shall immediately notify the city and the NAHC in consultation with the consulting Tribes.

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Cumulative Impacts

Impacts related to tribal cultural resources are site-specific and are assessed on a site by-site basis through the AB 52 Consultation process. The City requires applicants to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. Project impacts to Tribal Cultural Resources would be mitigated to a less-than-significant level through implementation of Mitigation Measures TCR-1 through TCR-7 and existing regulations. Therefore, because Tribal Cultural impacts are site specific, cumulative impacts related to Tribal Cultural Resources would be less than significant.

4.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water 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 waste water 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) ***Would the project require or result in the relocation or construction of new or expanded water, waste water 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 part of the project, utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services, would be extended from their current locations in the public ROW surrounding the project site for operation of the proposed self-storage building. The proposed project would connect to existing utility lines within the public ROWs along Alhama Drive, Ventura Boulevard, and Clarendon Street.

As discussed below, project impacts related to these issues would be less than significant.

Water

Local water conveyance infrastructure in the vicinity of the project site is maintained and operated by the Los Angeles Department of Water and Power (LADWP). As shown on Table 4.19-1, the project would require a net increase of approximately 3,366 gallons per day (gpd) of water and would generate an equal amount of wastewater. 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 4.19-1.

Table 4.19-1. Estimated Water Consumption and Wastewater Generation[1]

Land Use	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (Gallons per Day)
Storage: Self Storage Building	112,204 square-feet	30 gallons per day per 1,000 square feet	3,366
		Net Increase	**3,366**

1 Assumes wastewater generation equals water consumption.
2 **Source:** City of Los Angeles, Sewerage Generation Factor for Residential and Commercial Categories, April 6, 2012.

As part of the permitting process, the project Applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) 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 and impacts would be less than significant.

Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat a maximum of 450 million gallons per day (mgd) and a peak wet weather flow of 800 mgd. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. As identified on Table 4.19-1, above, the project would generate a net increase of approximately 3,366 gallons of wastewater per day. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the project. Therefore, project impacts related to wastewater treatment would be less than significant.

Stormwater Drainage

As discussed in response to Checklist Question X(c)(iii) in the Hydrology and Water Quality section, project impacts related to storm drainage facilities would be less than significant.

Electrical Power

As discussed in response to Checklist Questions VI(a) and (b) in the Energy section, project impacts related to electric power facilities would be less than significant.

Natural Gas

As discussed in response to Checklist Questions VI(a) and (b) in the Energy section, project impacts related to natural gas facilities would be less than significant.

Telecommunications

The Project Site would be served by existing telecommunications facilities that are available at the project site and would not require new or expanded facilities. Therefore, project impacts related to telecommunications facilities would be less than significant.

In summary, the project site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas, and telecommunications services. Furthermore, the Applicant would required to implement applicable building code and LA Green Building Code requirements that would further reduce demand for water, wastewater and energy services. Based on the above, potential impacts of the Project would be less than significant.

b) Would the project 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. Domestic water would be provided to the project site by the Los Angeles Department of Water and Power (LADWP). The LADWP provides domestic water for Woodland Hills and for portions of both the City and County of Los Angeles. The primary sources of water for LADWP are the Los Angeles Aqueducts, local groundwater, State Water Project, and the Colorado River Aqueduct. According to LADWP's Urban Water Management Plan (UWMP), LADWP has sufficient water supplies available for average weather years, dry, and multiple dry years through the year 2045. Water supplies for 2025 for an average weather year are projected by the UWMP to be 642,000 acre-feet per year.

The proposed Project would result in the development of a self-storage facility and associated improvements on developed land that is served by LADWP under existing conditions. The proposed Project would be consistent with citywide growth and would therefore not exceed the water demand estimates outlined in the LADWP UWMP. Furthermore, in compliance with the City's Municipal Code and the Green Building Code, the Project would be required to implement water-saving features to deduce the amount of water used by the Project. As such, there are sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

c) Would the project result in a determination by the waste water 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. A significant impact may occur if a project were to increase solid waste generation to such a degree that existing and projected landfill capacities would be insufficient to accommodate the additional solid waste.

The Los Angeles Bureau of Sanitation and Environment (LASAN) provides wastewater services to the City. Wastewater generated by the Project would be conveyed from the Project site via the City's existing sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The HWRP treats an average of 275 million gallons of wastewater per day on dry weather day. The plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day and peak wet weather flow of 800 million gallons per day (LASAN 2022). Therefore, the plant has a remaining capacity of approximately 175 million gallons per day. The proposed Project is expected to result in the generation of approximately 71,000 gallons of wastewater per day. Therefore, the Project would represent approximately 0.04 percent of the remaining daily capacity of HWRP. As such, the Project would result in the determination by the wastewater treatment provider that is has adequate capacity to serve the Project's projected demand in addition to the existing demand. Therefore, impacts would be less than significant.

d) Would the project 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. A significant impact may occur if a project were to increase solid waste generation to such a degree that existing and projected landfill capacities would be insufficient to accommodate the additional solid waste.

Waste generated in the City is disposed of at a number of landfills, including Sunshine Canyon Landfill and Chiquita Canyon Landfill. Sunshine Canyon Landfill has a remaining permitted capacity of 54.08 million tons and a maximum permitted daily capacity of 12,100 tons per day. The landfill currently accepts approximately 8,039 tons per day, meaning it has a remaining daily capacity of 4,061 tons per day (LA DPW 2020).

According to CalRecycle, commercial uses, such as the proposed Project, generate approximately 5 pounds of solid waste per 1,000 square foot per day. As such, the proposed 112,204-square-foot storage building would generate approximately 561 pounds of solid waste per day (CalRecycle 2023). This would represent a nominal portion of the remaining capacity of the City's landfills. Additionally, pursuant to AB 939, each

city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, the proposed Project would have a less than significant impact related to solid waste generation.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact. A significant impact were to occur if the Project's solid waste generation exceeded the capacity of available landfills. LASAN is responsible for the collection, disposal, and recycling of solid waste within the City, including the Project site. As previously discussed, the Project would not exceed the capacity of landfills serving the City. Additionally, the Project applicant would be required to divert at least 50 percent of solid waste generated by the Project from landfills, in accordance with AB 939. In addition, the Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the Project would be required to comply with CALGreen Code waste reduction measures for the operation of the Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The proposed Project would also comply with all federal, State, and local regulations regarding solid waste. Therefore, the proposed Project would have a less than significant impact regarding regulations related to solid waste.

Cumulative Impacts

Preparation of infrastructure plans for both the proposed Project and the three (3) Related Project's is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to development projects without interrupting or degrading services to existing customers.

The Project and other development projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because the comprehensive utility and service planning and coordination activities described above would ensure that new development projects do not disrupt or degrade the provision of utility services, cumulatively considerable impacts to utilities and service systems would not occur.

4.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – 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) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The County and City of Los Angeles are not "Contract Counties," therefore, the State Responsibility Area (SRA) fire protection is provided by the counties under contract with CAL FIRE. (CAL FIRE 2022). The California Department of Forestry and Fire Protection (CAL FIRE) provides prevention and suppression of wildland fire to the City and County of Los Angeles, including the project site. The project is not located within a Fire Hazard Severity Zone or a Very High Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2023). In addition, the project site is currently comprised of vacant land and is located in a developed portion of the City. The City's Disaster Plan outlines disaster routes but are not considered evacuation routes within the San Fernando Valley as Ventura Freeway 101, North Topanga Canyon Boulevard, and I-5 as primary disaster routes (LA DPW 2012). As for secondary disaster routes Ventura Boulevard is a route used in case of a disaster occurrence. In the case of an emergency, Clarendon Street and Alhama Drive be used as evacuation routes, but these roads are not explicitly outlined as evacuation routes by the City. As discussed in Section 4.9, the project would not significantly affect emergency response or evaluation activities. Therefore, no impacts associated with an emergency response or evacuation plan would occur.

b) Due to slope, prevailing winds, and other factors, would the project 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 within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). In addition, the project site is currently developed and within a developed portion of the City. Further, the project site is relatively flat and contains only limited amounts of ornamental vegetation associated with existing landscaping and does not contain extensive amounts of vegetation or wildfire fuel. Therefore, it is not anticipated that the project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Thus, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Therefore, no impacts associated with wildfire would occur.

c) Would the project 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 within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). In addition, the project site is located within a developed portion of the City. The project would construct surface parking lots, new internal circulation roadways, and infrastructure for the proposed development. It is not anticipated that installation or maintenance of internal driveways would exacerbate fire risk, as the driveways would be surrounded by developed land. Further, the project site is in a predominately developed area and would connect to existing utilities. The project would not require installation or maintenance of other associated infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. As such, the project would not exacerbate fire risk or that may result in temporary or ongoing impacts to the environment due to installation or maintenance of associated infrastructure. Therefore, no impacts associated with wildfire would occur.

d) Would the project 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 within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2023). As discussed in Section 4.7, Geology and Soils, the project would not result in significant risks associated with flooding, landslides, runoff, or drainage changes, and the project does not propose the use of fire (such as for a controlled vegetation burn) that would result in post-fire instability. Further, the project site is located within a developed portion of the City that is not susceptible to wildland fires, given its considerable distance from open, natural areas. Thus, the project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts associated with wildfire would occur.

Cumulative Impacts

Both the Project and the three (3) Related Projects are located within a developed, urban setting and not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone. As such, not cumulative impacts would occur.

4.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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. As described throughout this IS/MND, the project site is located in a fully developed, urban area surrounded by urban land uses and implementation of the project would not

degrade the quality of the environment; substantially reduce the habitats of fish or wildlife species; or cause a fish or wildlife population to drop below self-sustaining levels threaten to eliminate a plant or animals.

Per the Archaeological Resources Assessment dated January 2023 (Appendix C), a search of the CHRIS database for the proposed project site and 0.5-mile records search area did not identify any previously recorded historic-period or prehistoric archeological resources. Moreover, a pedestrian survey of the project site did not identify any extant structures within the project footprint. Therefore, the project would not eliminate important examples of major periods of California history or prehistory. However, the potential for intact cultural or tribal cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. Therefore, implementation of Mitigation Measures CUL-1 through CUL-3 and TCR-1 through TCR-7, the project would not eliminate important examples of major periods of California history or prehistory, and impacts would be less than significant.

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. For the reasons stated in this Initial Study, the proposed Project would not result in any significant impacts and would not contribute to a cumulatively significant impact for any resource area analyzed in this document.

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 evaluated throughout this IS/MND, with incorporation of mitigation identified herein, all environmental impacts associated with the project would be reduced to less-than-significant levels. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

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5 References and Preparers

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5.2 List of Preparers

Dudek

Ronelle Candia – Senior Project Manager
Clarisa Olaguez – Environmental Planner
Nicholas Lorenzen – Air Quality Specialist
Christopher Kallstrad – Senior Urban Forester
Ryan Allen – Urban Forestry Specialist
Linda Kry – Archaeologist
Heather McDevitt – Archaeologist
Michael Greene – Noise Specialist
Cole Martin - Environmental Acoustician
Ashley Vu - Environmental Acoustician
Lisa Valdez – Senior Transportation Specialist
Olana Chow – Survey Mapping Analyst

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6 Mitigation Monitoring and Reporting Program (MMRP)

6.1 Introduction

California Public Resources Code Section 21081.6 requires that, "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation." (PRC Section 21000–21177)

This Mitigation Monitoring and Reporting Program was developed in compliance with Section 21081.6 of the California Public Resources Code and Section 15097 of the CEQA Guidelines (14 CCR 15000–15387 and Appendices A–L.), and includes the following information:

- A list of mitigation measures
- The timing for implementation of the mitigation measures
- The party responsible for implementing or monitoring the mitigation measures
- The date of completion of monitoring

The City of Los Angeles must adopt this Mitigation Monitoring and Reporting Program, or an equally effective program, if it approves the proposed Project with the mitigation measures that were adopted or made conditions of Project approval.

6.2 Mitigation Monitoring and Reporting Program (MMRP)

Cultural Resources

MM-CUL-1: Workers Environmental Awareness Program Training.

All construction personnel and monitors who are not trained archaeologists should be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet should be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker should also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor. To ensure consistency of the training with the City's standard conditions, a cultural resource inadvertent discovery clause should be included on all construction plans, and a copy kept on the Project site throughout the duration of all construction tasks.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction

- **Monitoring Frequency:** Before Issuance of Grading Permit
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM-CUL-2: Retention of a Qualified Archaeologist.

A qualified archaeologist should be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities.

- **Enforcement Agency:** City of Los Angeles Department of Planning
- **Monitoring Agency:** City of Los Angeles Department of Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** As needed during ground-disturbing activities
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM-CUL-3: Inadvertent Discovery Clause.

If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to the following:

  SCCIC Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, California 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

  - **Enforcement Agency:** City of Los Angeles Department of Planning
  - **Monitoring Agency:** City of Los Angeles Department of Planning
  - **Monitoring Phase:** Construction

- **Monitoring Frequency:** Once during ground-disturbing activities; once after ground-disturbing activities
- **Action Indicating Compliance:** Issue of Grading Permit; Issue of Building Permit

Geology and Soils

MM-GEO-1 Discovery of Paleontological Resources.

In the event that paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. 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.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** After ground-disturbing activities
- **Action Indicating Compliance:** Submission of compliance report by Monitor

Tribal Cultural Resources

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once before issuance of Grading Permit
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Periodically during ground-disturbing activities
- **Action Indicating Compliance:** Issue of Grading Permit; Field inspection sign-off by Monitor

MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** As needed during ground-disturbing activities
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM TCR-4: If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-footbuffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards, retained by the Project Applicant, 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 about 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, to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant, as defined by CEQA (as amended, 2015), 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.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Periodically during ground-disturbing activities
- **Action Indicating Compliance:** Issue of Grading Permit; Field inspection sign-off by Monitor

MM TCR-5: 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.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** As needed during ground-disturbing activities
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM TCR-6: The City and/or Project Applicant shall, in good faith, consult with the Consulting Tribes on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities. The Consulting Tribes may retain all discovered TCRs in the form and/or manner the Consulting Tribes deems appropriate, at the Consulting Tribe's sole discretion, and for any purpose the Consulting Tribes deem appropriate, including for educational, cultural and/or historic purposes.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** As needed during ground-disturbing activities
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

MM TCR-7: Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, and the County Coroner shall be contacted. If the human remains are determined to be Native American in origin by the County Coroner, the Project Applicant shall immediately notify the city and the NAHC in consultation with the consulting Tribes.

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** As needed during ground-disturbing activities
- **Action Indicating Compliance:** Field Inspection sign-off by Monitor

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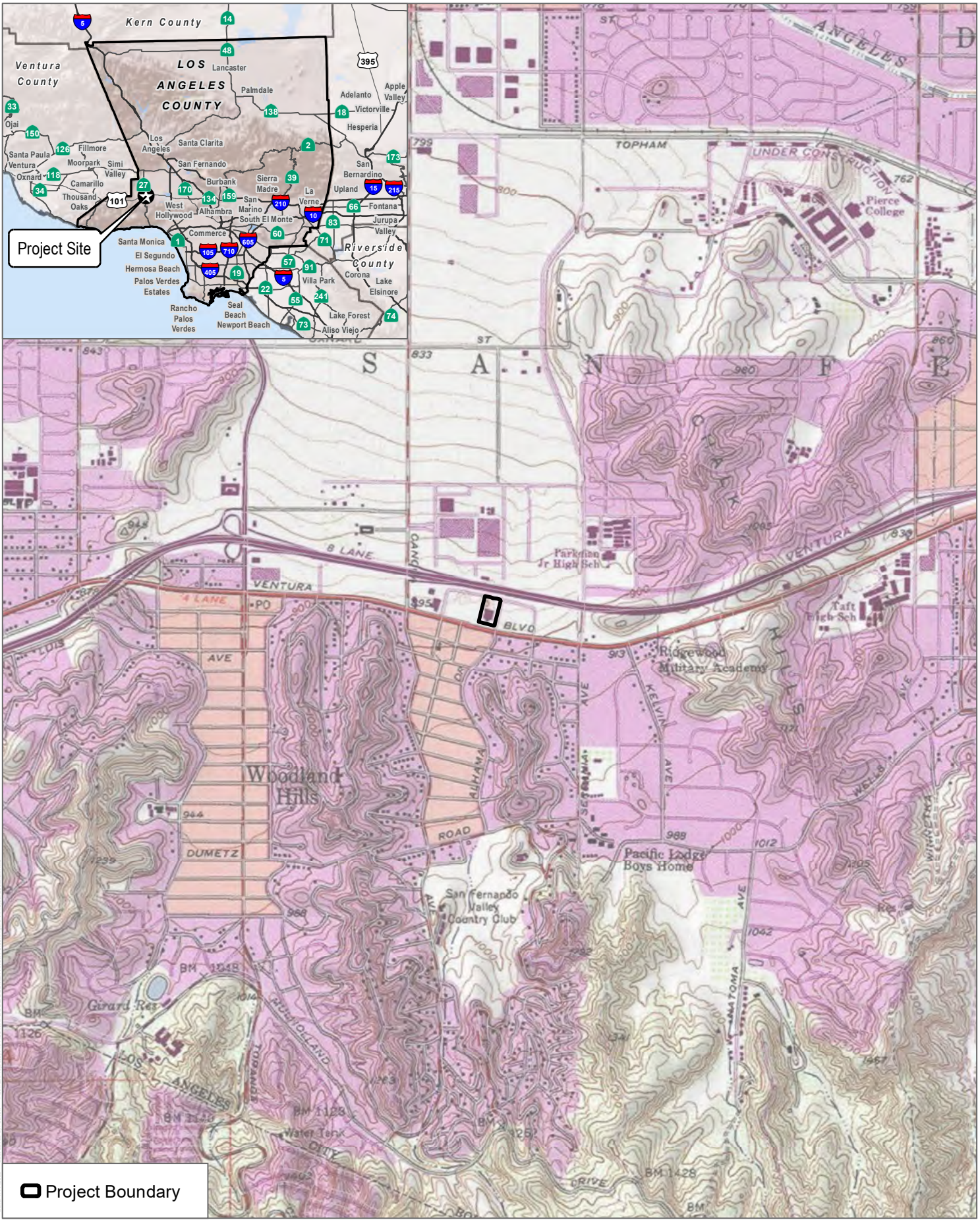

SOURCE: USGS 7.5-Minute Series Canoga Park Quadrangle

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

JDA Woodland Hills Project

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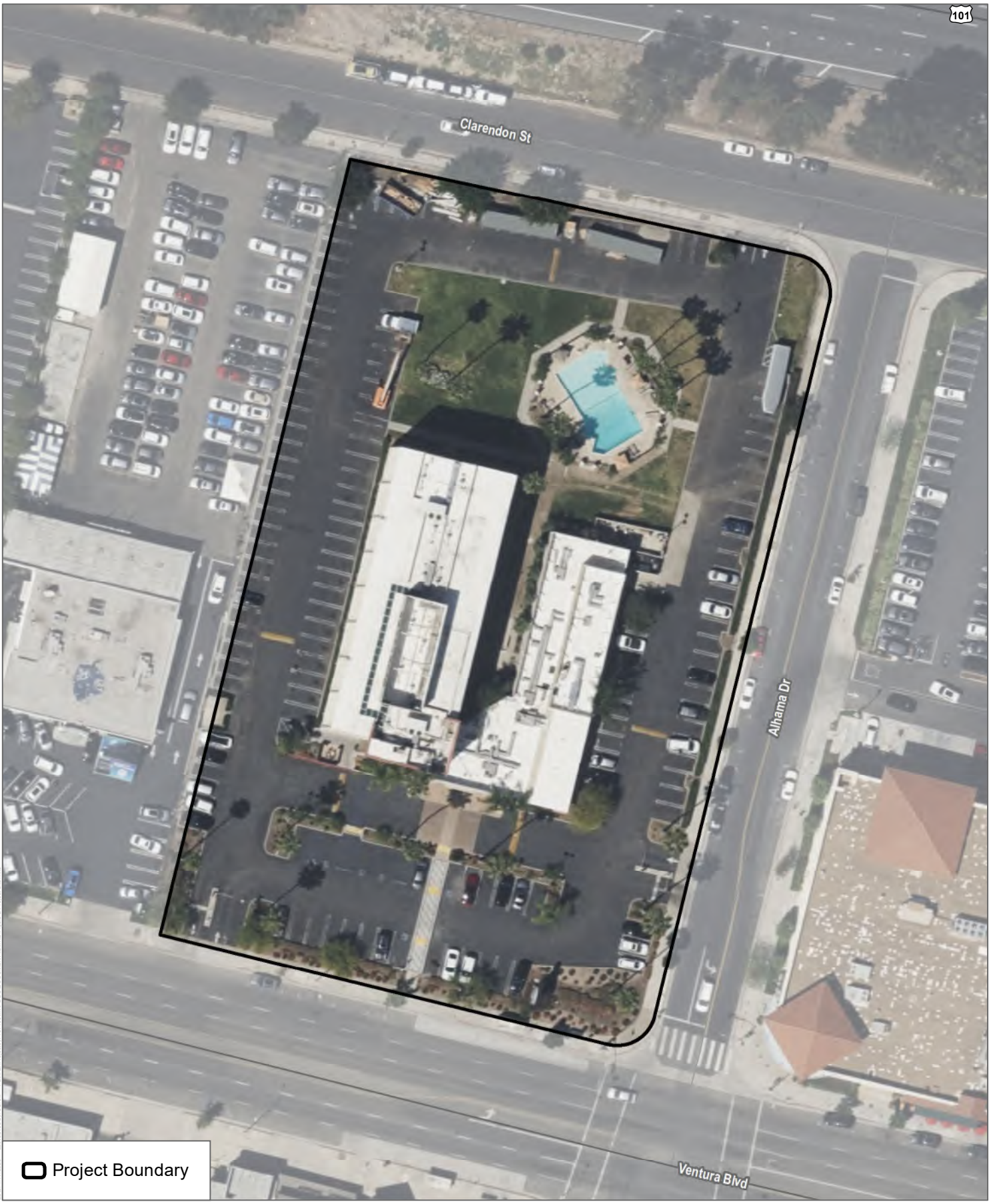

SOURCE: Bing Imagery 2022, Open Street Map 2019

DUDEK

0 30 60 Feet

FIGURE 2

Project Site

JDA Woodland Hills Project

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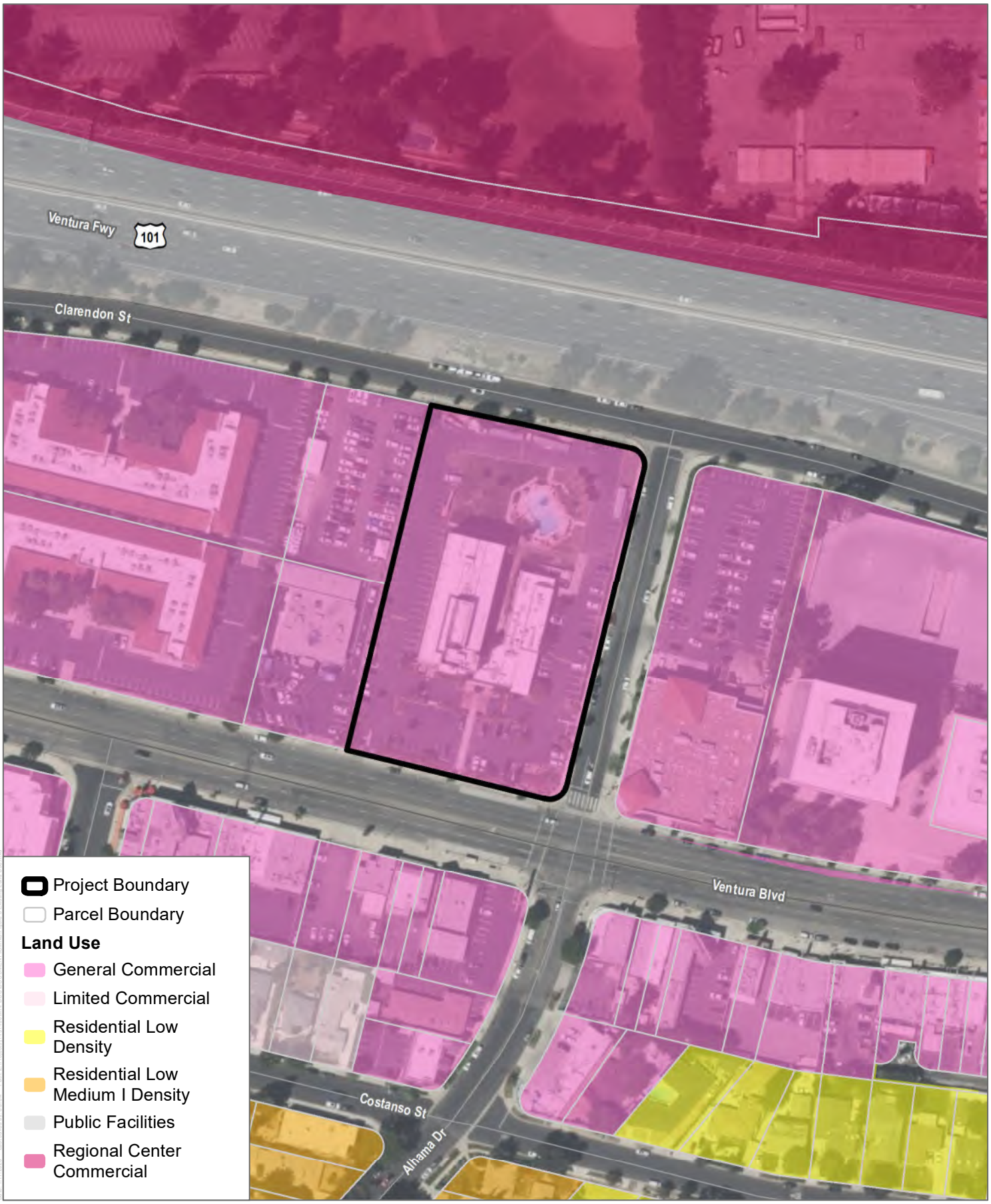

SOURCE: Bing Imagery 2022, Open Street Map 2019, City of Los Angeles 2019

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0 75 150 Feet

FIGURE 3

Existing Land Use

JDA Woodland Hills Project

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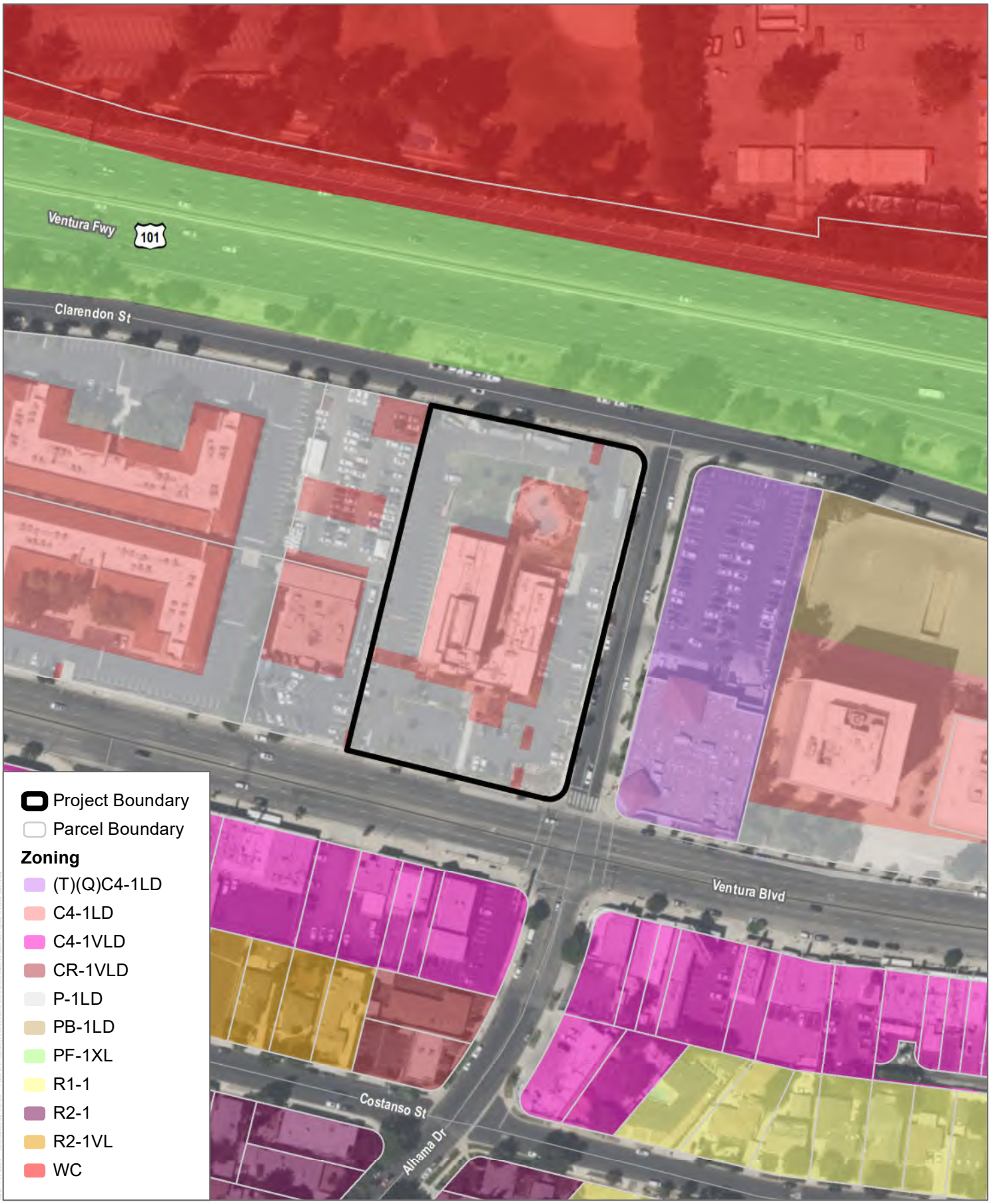

SOURCE: Bing Imagery 2022, Open Street Map 2019, City of Los Angeles 2019

DUDEK

0 75 150 Feet

FIGURE 4

Existing Zoning

JDA Woodland Hills Project

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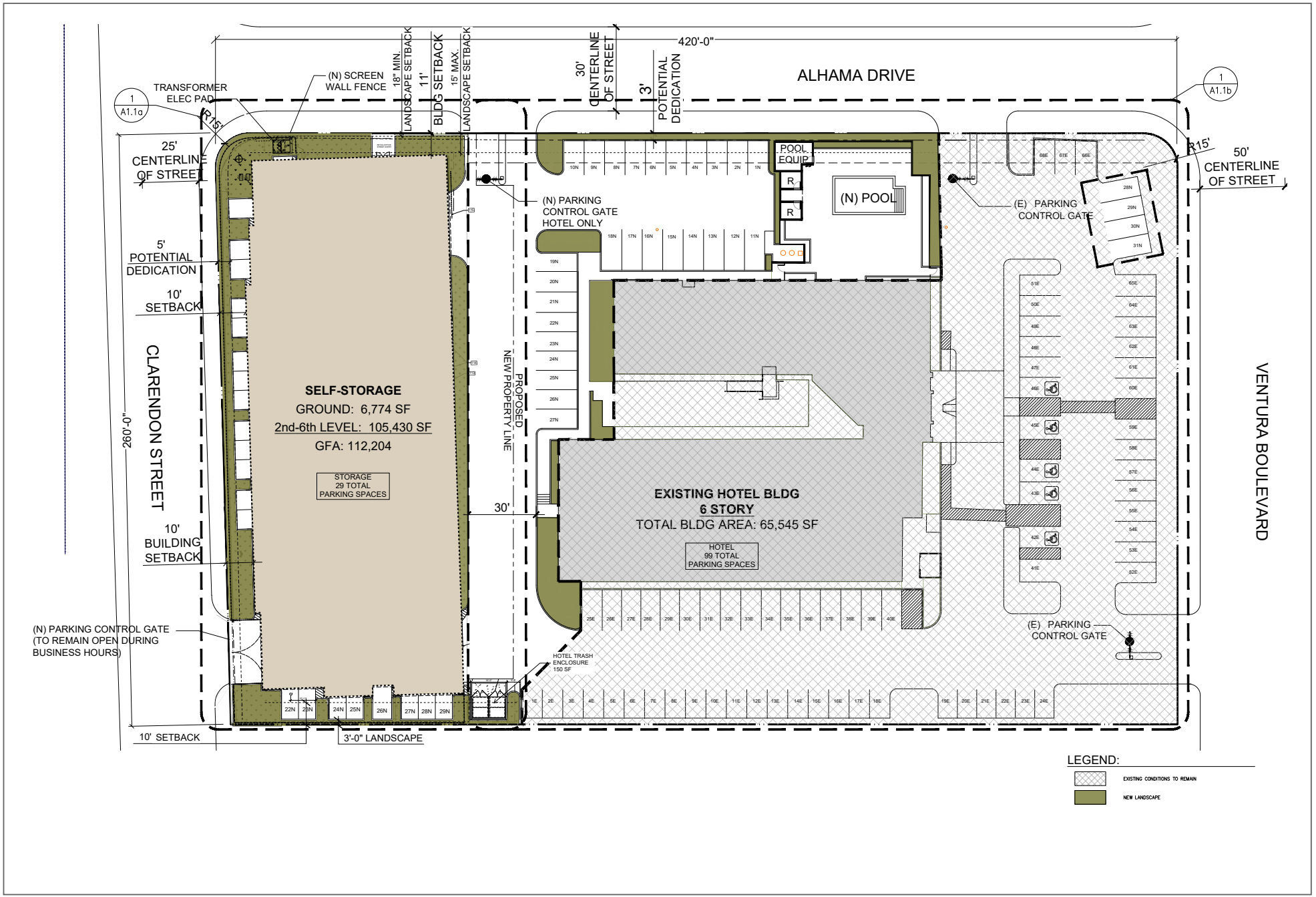

SOURCE: Ware Malcome Engineering, 2024

FIGURE 5
Site Plan
JDA Woodland Hills Project

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SOURCE: Bing Imagery 2022, Open Street Map 2019, City of Los Angeles 2019

DUDEK

0 70 140 Feet

FIGURE 6

Proposed Zoning

JDA Woodland Hills Project

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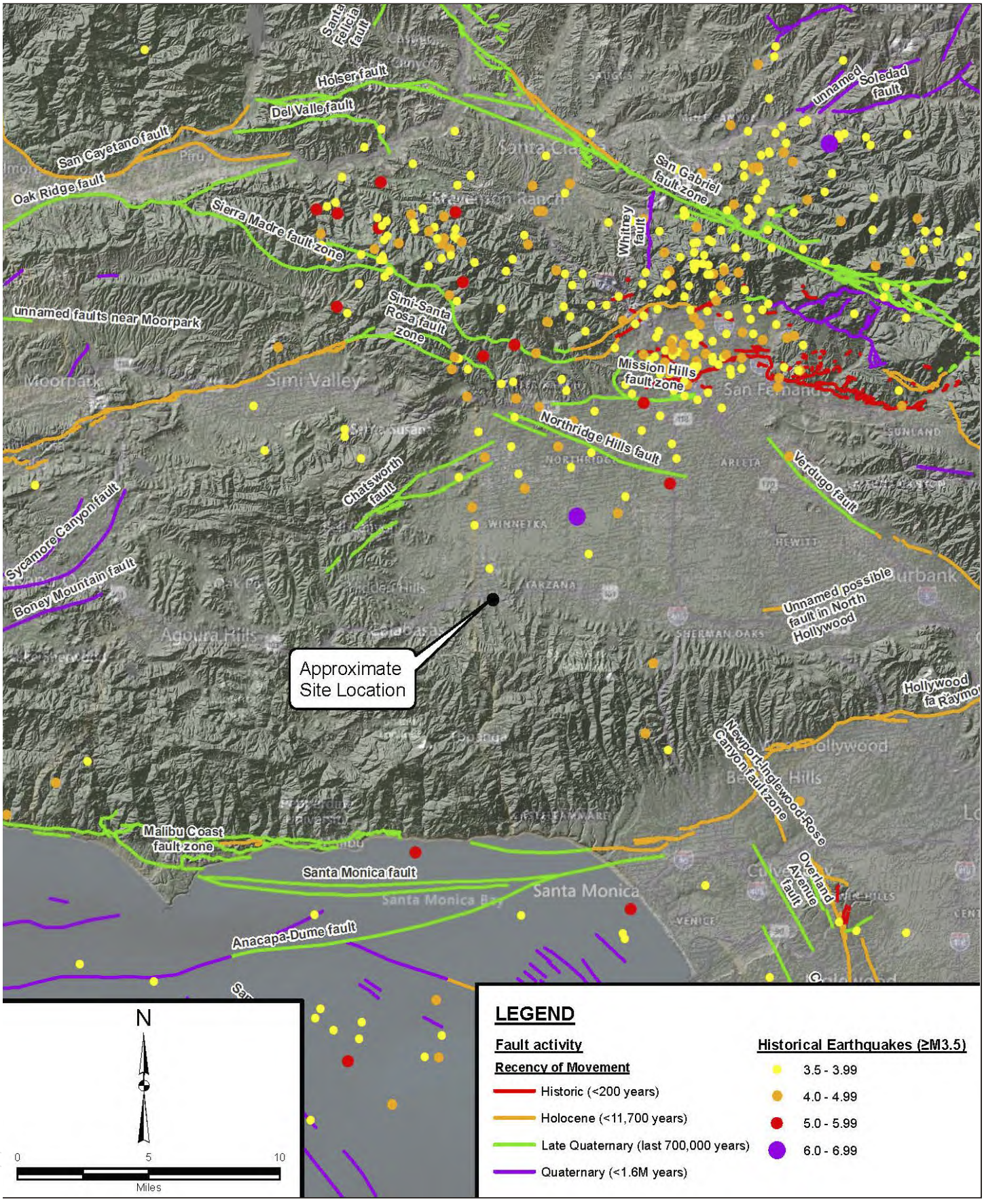

SOURCE: Leighton Group 2022

FIGURE 7

Seismic Hazard Map

JDA Woodland Hills Project

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