



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

Mitigated Negative Declaration

Tesla Delivery Hub and Service Center

Case Number: ENV-2023-4891-MND

Project Location: 9201 North Winnetka Avenue (9201-9203 North Winnetka Avenue), Chatsworth, CA, 91311

Community Plan Area: Chatsworth – Porter Ranch

Council District: 12 – John Lee

Project Description: The Project proposes the adaptive reuse of an existing 118,784 square-foot multiplex theater building (Pacific Theater) for a new Tesla Delivery Hub and Service Center. The Project would involve tenant improvements and exterior renovations to the existing multiplex building and site improvements including, restriping of the existing surface parking lot and new landscaping. The proposed Tesla Delivery Hub and Service Center involves the sale, inventory, preparation, delivery, and service of Tesla electric vehicles. The Tesla Delivery Hub and Service Center will contain 24,376 square feet of Sales and Showroom floor area (inclusive of 7,461 square feet of covered outdoor area), 48,361 square feet of Service Area/Parts Storage floor area, and 46,047 square feet of Delivery Prep area. The Project proposes to remove 95 vehicular parking spaces for a total of 1,147 parking spaces on-site. Of the 1,147 parking spaces to remain, 898 parking spaces will be repurposed as vehicle inventory/storage space, while 249 parking spaces will remain for use by employees, customers, and visitors. Any proposed on-site grading would result in the import/export of less than 1,000 cubic yards of soil.

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

1. Pursuant to LAMC Section 12.32 F and 12.32 Q, a Vesting Zone Change from the [Q]M2-1 and P-1 zones to the (T)(Q)M2-1 Zone;
2. Pursuant to LAMC Section 12.24 W.4, a Conditional Use to allow automotive use in the proposed M2-1 Zone that is within 500 feet of a residential use or an A or R Zone; and
3. Any additional discretionary or ministerial actions from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, demolition, removal and replacement of street trees, grading, temporary street closure permits, and sign permits.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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APPLICANT:

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May 2024

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1 INTRODUCTION

An application for the proposed Tesla Delivery Hub and Service Center (Project) has been submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study and Mitigated Negative Declaration (IS/MND) is required. Thus, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City. Based on the analysis provided in this IS/MND, the City has concluded that with implementation of the identified mitigation measures, the Project would not result in any significant environmental impacts. The IS/MND is an informational document and is required to be adopted by the decision maker prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an Environmental Impact Report (EIR) is normally required.²

¹ The study of alternatives to a project is only required as part of an Environmental Impact Report.

² State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 CEQA PROCESS

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

At the onset of the environmental review process, the City has prepared this Initial Study to determine whether the Project may have a significant effect on the environment. The analysis contained herein determined that with mitigation, the Project would not have a significant effect on the environment. Therefore, an IS/MND was determined to be the appropriate CEQA document.

1.3 ORGANIZATION OF THE IS/MND

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

1 INTRODUCTION

Describes the purpose and content of the IS/MND and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination as to whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the Project and its environmental setting, including specific characteristics of the Project and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

5 MITIGATION MONITORING PROGRAM

Contains a summary of the mitigation measures and Project design features that would be implemented as part of the Project and also describes the monitoring of the implementation of the mitigation measures and Project design features.

2 EXECUTIVE SUMMARY

PROJECT TITLE	TESLA DELIVERY HUB AND SERVICE CENTER
ENVIRONMENTAL CASE NO.	ENV-2023-4891-MND
RELATED CASES	CPC-2023-4890-VZC-CU

PROJECT LOCATION	9201 WINNETKA AVENUE, CHATSWORTH, CA 91311
COMMUNITY PLAN AREA	CHATSWORTH - PORTER RANCH
GENERAL PLAN DESIGNATION	LIGHT MANUFACTURING
EXISTING ZONING	[Q]M2-1 & P-1
PROPOSED ZONING	(T)(Q)M2-1
COUNCIL DISTRICT	12 – JOHN LEE

LEAD CITY AGENCY	City of Los Angeles Department of City Planning
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APPLICANT	WINCAL, LLC
ADDRESS	120 N. ROBERTSON BOULEVARD, FLOOR 3 LOS ANGELES, CA 90048
PHONE NUMBER	310-855-8418

PROJECT DESCRIPTION

The Project Applicant, Wincal, LLC, seeks to reutilize the existing 118,784 square foot multiplex theater building for a new Tesla Delivery Hub and Service Center. The Project would consist of the demolition of existing interior improvements and fixtures; construction of interior tenant improvements, exterior façade renovations, and site improvements; reorganization of the existing surface parking lot; and operation of a new automobile sales and service center.

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

ENVIRONMENTAL SETTING

The approximately 14.61-acre Project Site is located at 9201 North Winnetka Avenue, and is a flat, irregular-shaped parcel with an approximately one percent downward slope from the northwest to the southeast. The Assessor Parcel Number (APN) is 2748-039-036. The existing land use designation for the Project Site in the Chatsworth-Porter Ranch Community Plan is Light Manufacturing, and the existing zoning for the Site [Q]M2-1 and P-1.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None

CALIFORNIA NATIVE AMERICAN CONSULTATION

Yes.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Trevor Martin

City Planner

PRINTED NAME

TITLE

Trevor Martin

May 2, 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less 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 EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Applicant, Wincal, LLC, seeks to reutilize the existing approximately 118,784 square foot multiplex theater building for a new Tesla Delivery Hub and Service Center. The Project would not involve mass grading activities or the ground-up construction of any new buildings and would instead consist of the demolition of existing interior improvements and fixtures; construction of interior tenant improvements, exterior façade renovations, and site improvements; reorganization of the existing surface parking lot; and operation of a new automobile sales and service center on an approximately 14.61-acre (636,198 square feet) property (Assessor Parcel Number (APN) 2748-039-036).

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located in the northwest San Fernando Valley in the Chatsworth community of the City of Los Angeles, approximately 23 miles northwest of downtown Los Angeles. The 14.61-acre Project Site is a flat, irregular-shaped parcel with an approximately one percent downward slope from the northwest to the southeast, with street frontages/access to Winnetka Avenue on the east, Oso Avenue on the west, and Prairie Street to the north. The Project Site is currently improved with the Pacific Theater Multiplex building (approximately 118,784 square feet) containing the Pacific Theater movie theaters and two ancillary retail uses (yogurt shop and fitness center).

The Project Site was originally a part of the larger Winnetka Drive-in motion picture theater complex until approximately 1996 when plans were approved (ZA 1996-0558(ZV)) to demolish the drive-in theater and develop the walk-in movie theater and three stand-alone restaurant/retail buildings (the three stand-alone buildings are not a part of the Project Site). In 2003, Parcel Map 2003-1065 was approved splitting the larger 27.18-acre property into five parcels (A, B, C, D, and E) to accommodate the theater and three stand-alone restaurant/retail buildings (currently Parcel A – Pacific Theater Multiplex; Parcel B-Applebee’s; Parcel C-Subway, the Habit, and others; and Parcel D-Stonefire, Verizon, and others). The fifth parcel (Parcel E) is approximately 415,580.8 square feet (9.54 acres) in area and is improved as a surface parking lot, which is not a part of the Project Site. In 2022, a Lot Line Adjustment was recorded to adjust the boundaries of Lots 1 (Parcel A of PM 2003-1065) and 2 (Parcel E of PM 2003-1065), resulting in a new lot area of 14.61 acres for Lot 1 and 9.54 acres for Lot 2. The Project Site only consists of the Parcel A area.

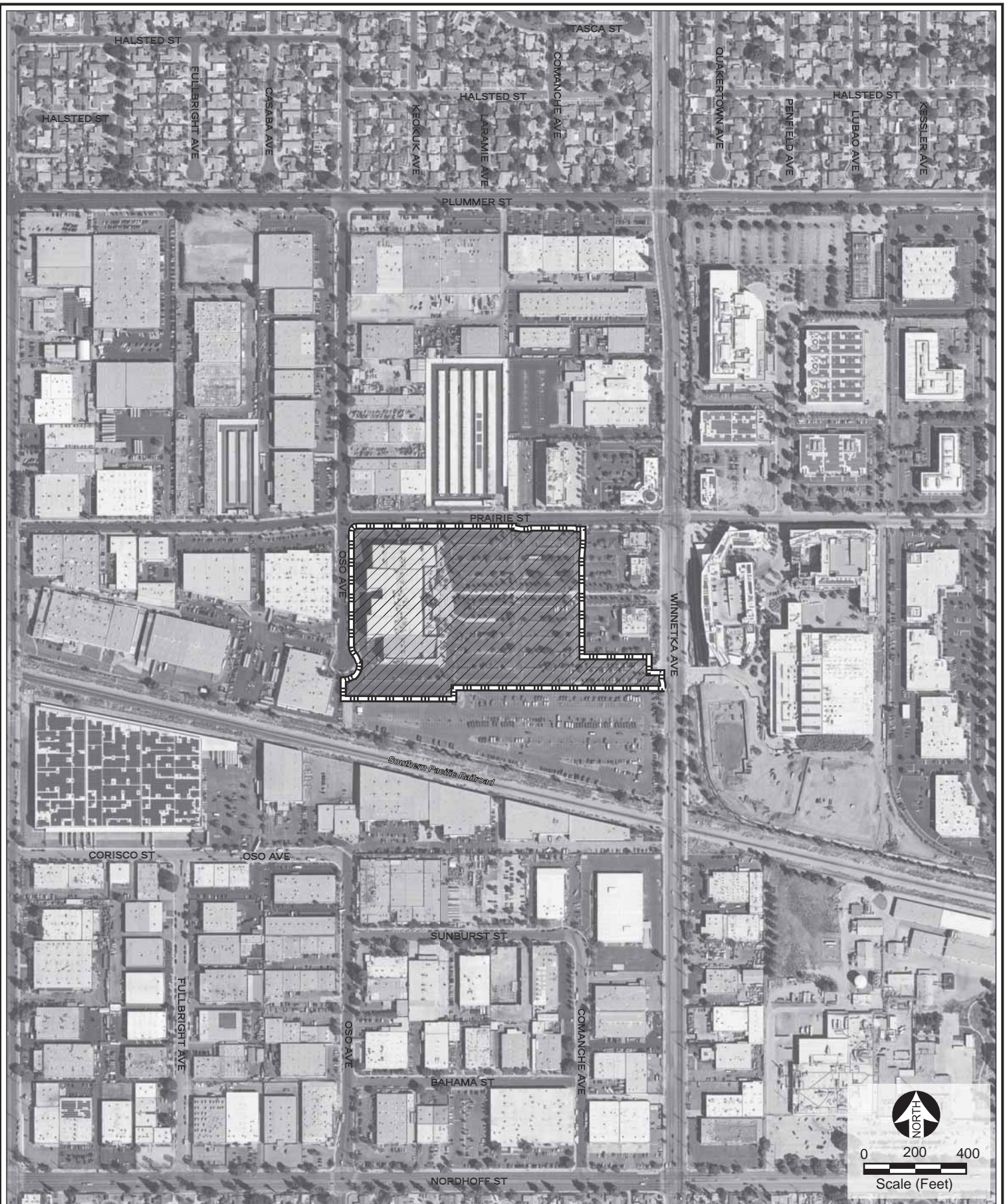


Legend

 Project Site

Source: Google Maps 2022.

Figure 3-1
Regional Location Map



Legend

 Project Site

Source: Google Maps 2024.

Figure 3-2
Aerial Map

The Project Site is within the [Q]M2-1 and P-1 zones.¹ In 1974 the City Council adopted Ordinance No. 145,616 requiring a temporary (Q) Qualified classification for the M2-1 zoned portion of the Project Site that states: “Development of the property shall be limited to those uses permitted in the MR2-1 zone or for drive-in outdoor motion picture theatre purposes.” In 1990 the City Council adopted Ordinance No. 165,788 making the [Q] Classification permanent. The P-1 zoned portion of the Project Site is located along the Winnetka Avenue frontage and has an approximate depth of 38 feet.

The Project Site is located within the Chatsworth–Porter Ranch Community Plan and is designated for Light Manufacturing land uses corresponding to the MR2 and M2 zones.

As reported in the City’s Zoning Information and Mapping System (ZIMAS), the Project Site is also located within the Los Angeles State Enterprise Zone (Zoning Information Bulletin ZI-2374) and the Chatsworth-Northridge Industrial Core (INNOV818).

3.2.2 Surrounding Land Uses

The Zone Classification of the surrounding properties are: MR2-1 north of Prairie Street; MR2-1 west of Oso Avenue; [Q]M2-1/P-1 adjacent to the east; [Q]CM-1-MPR and MR2-1 to the east across Winnetka Avenue; [Q]M2-1 adjacent to the south; and PF-1XL for the Southern Pacific railroad right-of-way south of the surface parking lot. Surrounding land uses include light industrial to the north, northwest, and west; and parking and the Southern Pacific railroad right-of-way to the south. Restaurants are adjacent to the Project Site on the east. Further east, across Winnetka Avenue, is a corporate office/mixed-use residential project. A map showing the surrounding land uses is provided in Figure 3-3.

3.3 DESCRIPTION OF THE PROJECT

The Project involves the reutilization of the existing approximately 118,784 square foot building for a new Tesla Delivery Hub and Service Center, to include the sale, inventory, preparation, delivery, and service of Tesla electric vehicles, and would not involve mass grading activities or the ground-up construction of any new buildings. The Project would include three distinct areas dedicated to: 1) sales/showroom and ancillary office inclusive of back of house operations (24,376 square feet, including 7,461 square feet of covered outdoor area); 2) delivery hub inclusive of the inventory, preparation, and delivery of vehicles (46,047 square feet); and 3) service center inclusive of the servicing of currently owned Tesla vehicles (48,361 square feet). The proposed site plan is provided in Figure 3-4.

The proposed interior improvements of the existing building include the demolition of the existing interior and the construction of a showroom, ancillary office spaces, back of house operations, vehicle preparation area for new cars, service area inclusive of parts and storage, and a service

¹ While a portion of the Project Site is zoned P-1, nothing would be built on this portion of the Project Site and it will only be used for parking. Therefore, the Project does not require a zone change.

lounge for customers. The proposed exterior façade renovations include demolition and removal of the existing approximately 74-foot crown structure and two existing ticket booths. Portions of the north, east, and west elevations would include demolition of existing wall, storefront, building perimeter, curb, and sidewalk to allow for the construction of new concrete drives and overhead doors leading into the building. The exterior façade would also undergo application of a new paint scheme reflective of the Tesla brand. New signs are proposed on the north, south, east, and west elevations of the building, compliant with Article 4.4 of the LAMC. Project elevations are provided in Figures 3-5 and 3-6.

Tesla vehicles are built to order through an online ordering process. Customers would be able to view vehicles at the on-site showroom, complete test drives, and explore the vehicles and their features. Customers would also take delivery of their new vehicles on-site by appointment only. The proposed hours for the showroom are 10 AM to 7 PM daily.

Once ordered online, the vehicles would be brought to the Project Site for final preparation and delivery to customers. The final preparation of the vehicles would occur within the building and includes software updates, wash/detail work, and charging of the vehicles. Once preparation is complete, the vehicles would be stored within the Vehicle Sales Area (Inventory). The pre-ordered vehicles would be brought to the Site by auto shipping trucks. These trucks would have exclusive access to the Project Site through the existing driveway located along Oso Avenue for ingress, and once unloaded, the trucks would utilize the Prairie Street driveway for egress.

Standard servicing and repair of the vehicles would include software updates, tire replacement, tire balancing, replacement of bolt-on parts (e.g. window regulators, door handles, suspension components, bumpers, etc.). Battery inspections may occur on-site. However, battery replacement would only take place on an “as needed” basis and batteries would not be stored onsite for more than 24 hours. In addition, battery repair would not occur at the Project Site. Tire replacement would be offered on-site with old tires removed and stored or disposed daily. The service hours would be 8 AM to 6 PM Monday through Friday, and 9 AM to 3 PM on Saturdays.



Legend

 Project Site

Source: Google Maps 2024.

Figure 3-3
Surrounding Uses

KEY NOTES

- ① PROPERTY LINE
- ② EXISTING ADA PARKING
- ③ EXISTING SPEED BUMP
- ④ EXISTING PARKING LIGHT POLE

LEGEND

- (E) LANDSCAPE AREA
- PROPERTY LINE
- - - PROPERTY SET BACK
- NEW FENCE
- ▨ ACCESSIBLE ROUTE: 4'-0" WIDE MINIMUM, 5'-0" WIDE AT DOORWAYS; 4" WHITE PAINTED STRIPING, SPACED AT 3'-0" ON CENTER, AT 30 DEGREE ANGLE.

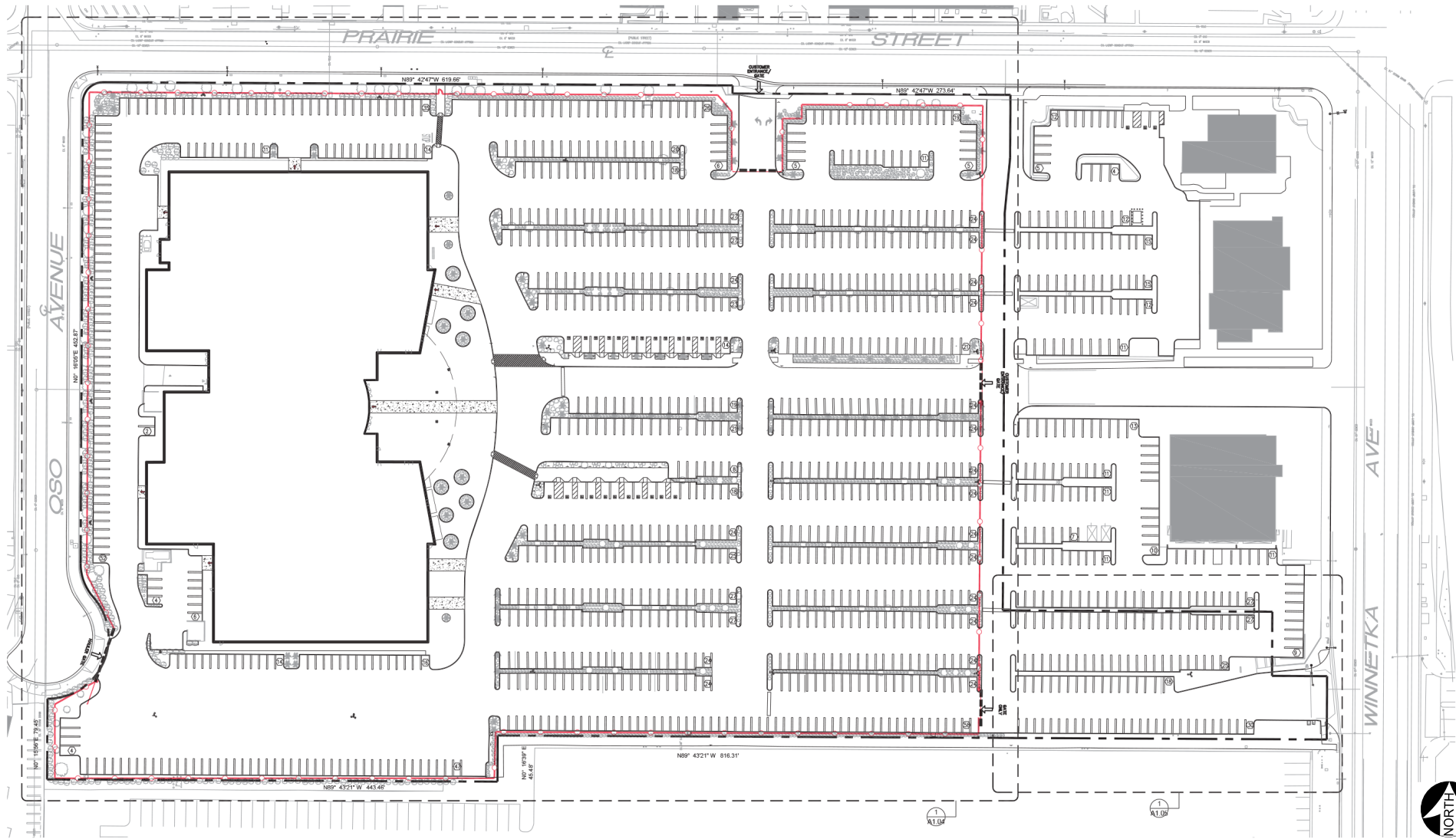
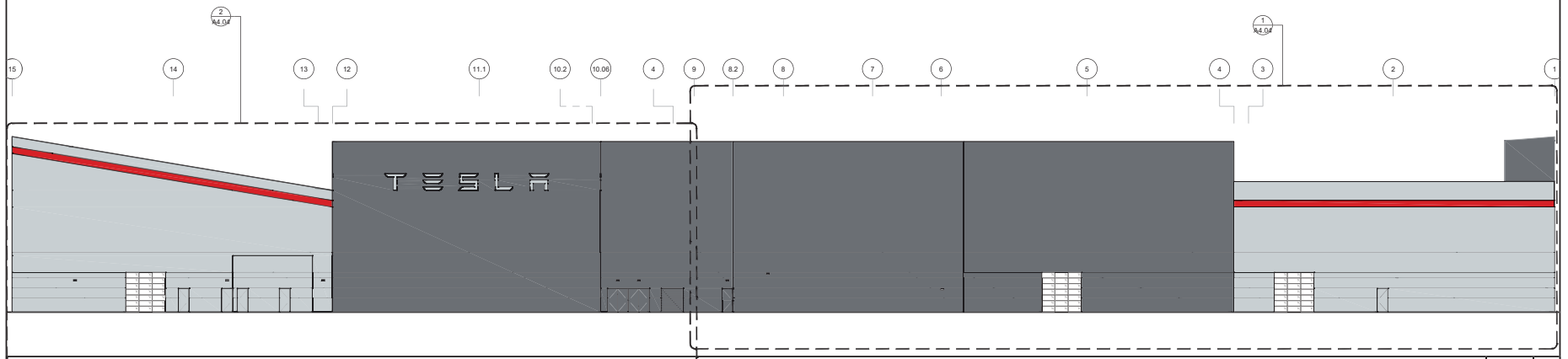


Figure 3-4
Site Plan

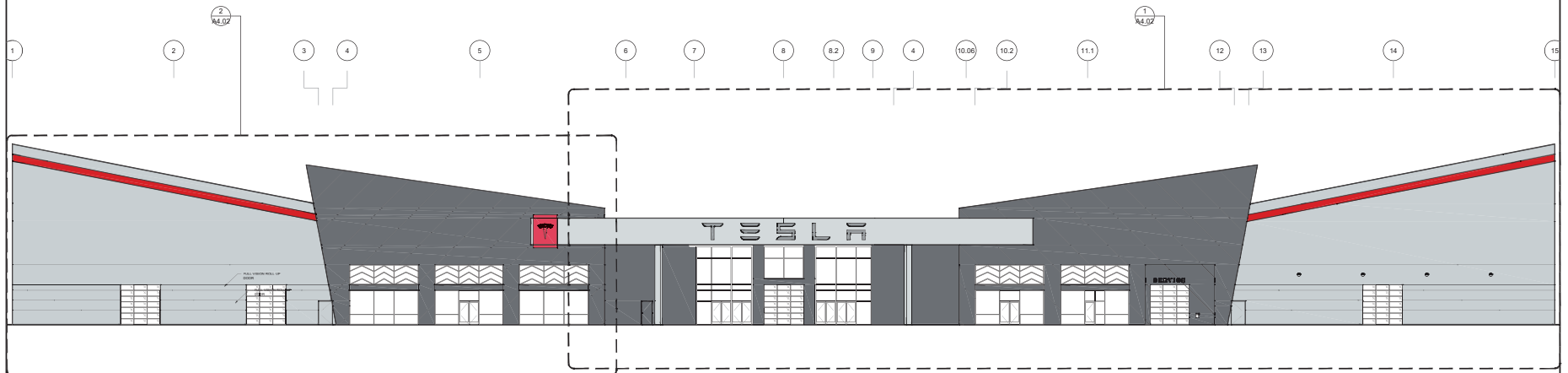
GENERAL NOTE

1. EXISTING BUILDING EXTERIOR IS A 10" CONCRETE BLOCK WITH A CEMENT STUCCO WALL FINISH

- PT-1: BENJAMIN MOORE, BM 2087-10 "NEON RED"
- PT-5: BENJAMIN MOORE, BM 2124-20 "TROUT GRAY"
- PT-8: BENJAMIN MOORE, BM 2124-50 "BUNNY GRAY"



WEST EXTERIOR KEY ELEVATION SCALE: N.T.S. 1



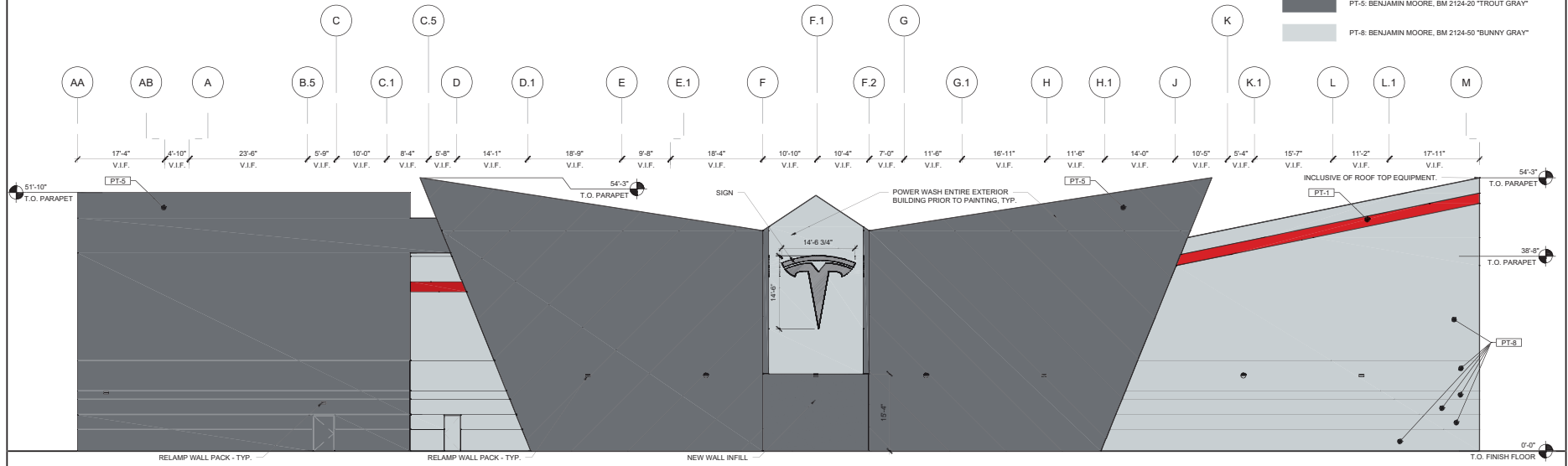
EAST EXTERIOR KEY ELEVATION SCALE: N.T.S. 1

Figure 3-5
West and East Elevations

GENERAL NOTE

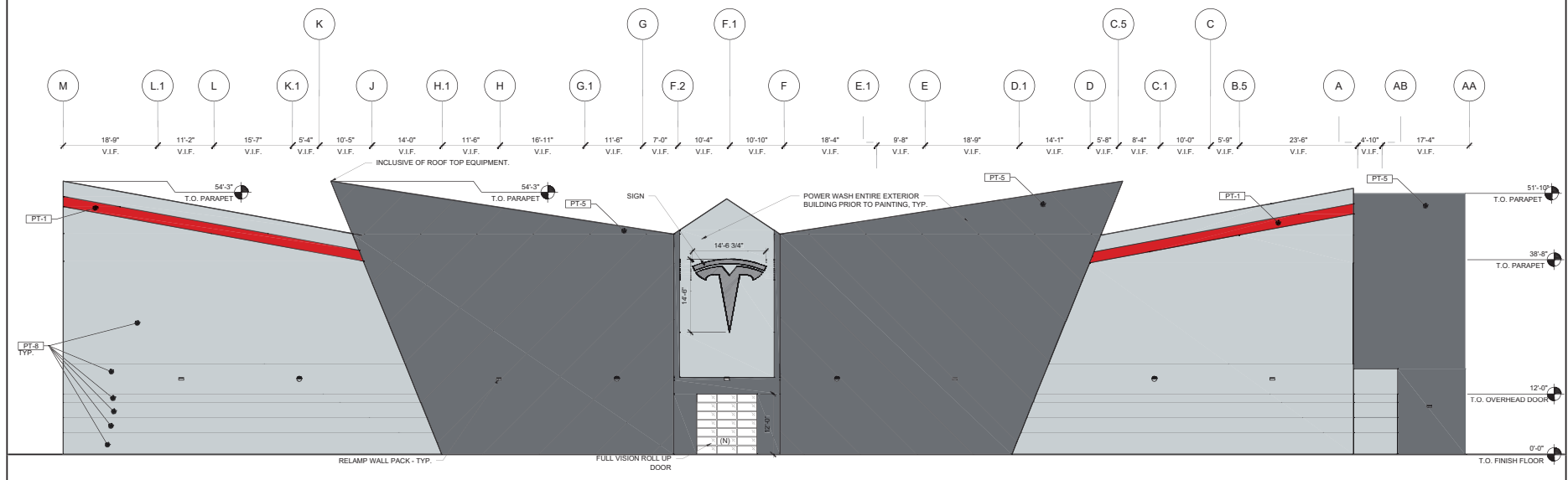
1. EXISTING BUILDING EXTERIOR IS A 1" CONCRETE BLOCK WITH A CEMENT STUCCO WALL FINISH

- PT-1: BENJAMIN MOORE, BM 2087-10 "NEON RED"
- PT-5: BENJAMIN MOORE, BM 2124-20 "TROUT GRAY"
- PT-8: BENJAMIN MOORE, BM 2124-50 "BUNNY GRAY"



SOUTH EXTERIOR ELEVATION

2



NORTH EXTERIOR ELEVATION

1

**Figure 3-6
South and North Elevations**

3.3.1 Vehicle Access

Access to the Project Site would be provided from existing driveway aprons located along Winnetka Avenue, Prairie Street, and Oso Avenue. As mentioned above, the Oso Avenue driveway would provide exclusive access for vehicle delivery trucks. The Prairie Street driveway would be the primary public entrance/exit for the Tesla Delivery Hub and Service Center, while the Winnetka driveway would be a secondary public access/exit point.

3.3.2 Vehicle and Bicycle Parking

Vehicle parking would be provided within the existing landscaped surface parking lot, which currently contains approximately 1,242 parking stalls. The proposed on-site circulation for auto-ship trucks that would off-load the vehicles on-site requires removal of 81 existing parking stalls and a landscape island within the southwest portion of the Project Site. Reutilization of the existing building would require the removal of an additional 14 stalls for a total of approximately 95 parking stalls that would be removed. In addition, a total of approximately 898 existing parking stalls would be repurposed for use as a Vehicle Sales Area for inventory of new pre-ordered vehicles for customer pick-up. Finally, the remaining existing 249 parking stalls would be provided for public use, and are located at the north and northeast portion of the Project Site, meeting and exceeding the required State Enterprise Parking requirement.

3.3.3 Trees

As discussed in greater detail in Section 4 of this IS/MND, a tree report was prepared by a certified arborist in accordance with the City's Tree Preservation Ordinance No. 186,873, and this report is included as Appendix B to this IS/MND. The tree report identified 257 private property trees, no public right-of-way trees, and no offsite trees whose canopies overhang the Project Site. Of these trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of 11 non-protected private property trees, while the remaining trees would be preserved.

3.3.4 Fencing

The Project would include installation of 6-foot-tall steel-tube perimeter fencing with four automatic vehicular gates, along the perimeter excluding an approximately 38,409 square-foot "dogleg" portion with frontage along Winnetka Avenue. The perimeter fencing ("Durable Barrier") is consistent with the City of Los Angeles' Landscape Guidelines "K" and allows for security of the Vehicle Sales Area (Inventory). In addition, automatic vehicular gates would be installed at two locations along the interior eastern property line, as well as the Oso Avenue and Prairie Street access drives with a queuing distance of 40-feet from the property line at the Prairie Street driveway.

3.3.5 Solar Panels

The Project would include solar panels on 15 percent of the roof area (formally provided as Project Design Feature PDF-1, below).

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.32 F and 12.32 Q, a Vesting Zone Change from the [Q]M2-1 and P-1 zones to the (T)(Q)M2-1 Zone;
- Pursuant to LAMC Section 12.24 W.4, a Conditional Use to allow automotive use in the proposed M2-1 Zone that is within 500 feet of a residential use or an A or R Zone; and
- Any additional discretionary or ministerial actions from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, demolition, removal and replacement of street trees, grading, temporary street closure permits, and sign permits.

3.5 RELATED PROJECTS

In this IS/MND, cumulative impact analyses are provided for each environmental issue discussed in Section 4 (Environmental Impact Analysis) and can be found in each respective subsection of Section 4. According to the Los Angeles Department of Transportation (LADOT), there is only one related project within a half mile of the Project Site. The application for this project was filed in 2013 and the project is the mixed-use project located at 20000 West Prairie Street, across Winnetka Avenue from the Project Site. A portion of this related project has already been built, and the third phase is currently under construction and consists of the development of 260 apartment units. A map showing the location of this related project is provided in Figure 3-7.

3.6 PROJECT DESIGN FEATURES

The following Project Design Features (PDFs) would be included as part of the Project:

PDF-1 The Project will include solar panels on 15 percent of the roof area.

PDF-2 Where available, the Project will use power poles to provide electricity during construction.

3.7 SUMMARY OF MITIGATION MEASURES

As discussed in greater detail in Section 4 of this IS/MND, the following mitigation measures are applicable to the Project:

TRA-1 The Project Applicant shall offer a transit subsidy to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project Applicant shall offer a daily transit subsidy of at least \$0.75 to all employees.

TRA-2 The Project Applicant shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides.

TRA-3 Construction Traffic Management Plan

Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

TCR-1

If tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist, defined as someone meeting the Secretary of the Interior Professional Qualification Standards in Archaeology, retained by the Project Applicant shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeano Tataviam Band of Mission Indians (FTBMI) to observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

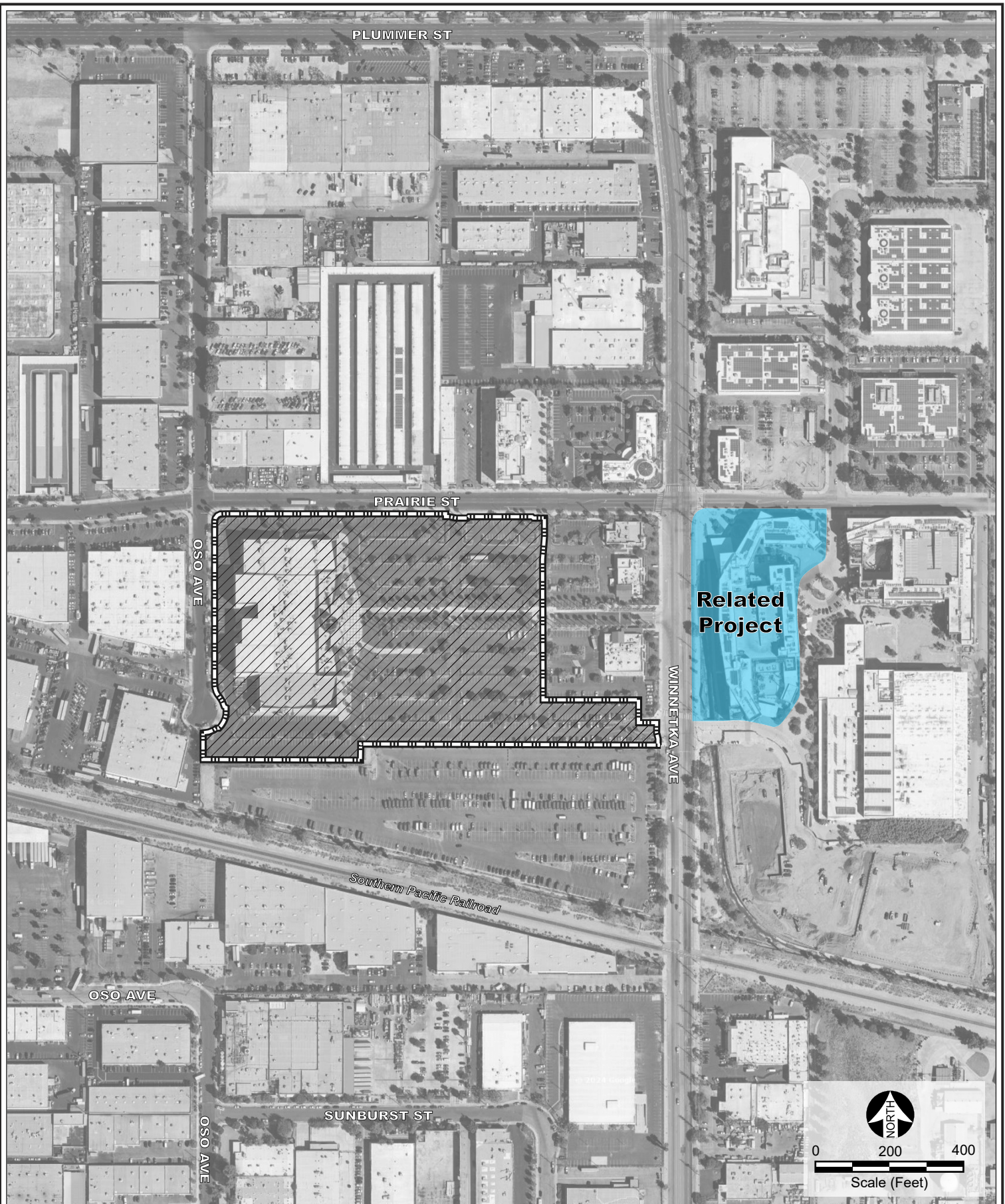
TCR-2

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-3

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 pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.



Legend

 Project Site

Source: Google Maps 2024.

Figure 3-7
Related Project Location Map

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

No Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is located in an urbanized portion of Los Angeles and is topographically relatively flat. Streets in the Project area are densely populated with commercial and industrial buildings, and occasionally, residential uses. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels, although views of mountains to the north are currently available

from some vantage points. The Project would reutilize the existing theater building for a new Tesla Delivery Hub and Service Center. As the Project would not change the height or orientation of the on-site development, views of the mountains to the north would continue to be available in the Project area, and no impact would occur.

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

No Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.¹ The nearest state designated scenic highway is Topanga Canyon Boulevard (State Route 27), which is approximately 1.8 miles from the Project Site. Therefore, no impact would occur.

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

Less Than Significant Impact. The Project Site is located within an urbanized area, and thus, the following analysis will focus on whether the Project will conflict with any applicable zoning and/or other regulations governing scenic quality. As discussed below under “Land Use,” the Project would be consistent with the General Plan land use designation for the Project Site. With respect to the Project Site zoning, the Project requests a Vesting Zone Change from [Q]M2-1 and P-1 to M2-1, removing the [Q] condition. However, the [Q] condition only limits the use on the Project Site and is not related to scenic quality. The Chatsworth – Porter Ranch Community Plan designates the area north of Stoney Point, east of Topanga Canyon Boulevard, and south of the 118/Simi Freeway as a scenic landmark. However, the Project would not conflict with this designation or otherwise impact this resource. The Chatsworth – Porter Ranch Community Plan does not contain any other policies with regard to scenic quality, and therefore, the Project would not conflict with any applicable zoning or other regulations governing scenic quality, and this impact would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets.

¹ California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways, https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx, accessed October 20, 2023.

Artificial Light

An adverse impact would occur if a project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, the existing uses on the Project Site (movie theater and other commercial uses, as well as the associated surface parking lot) currently provide a moderate amount of illumination at the Project Site. The Project would reutilize these existing sources of illumination, demolish existing exterior lighting, and add new illuminated signs on the east and west sides of the building. Any exterior building lighting would be designed to confine illumination to the Project Site and would not result in any additional illumination at any light sensitive receptor, the closest of which is approximately 500 feet east of the Project Site (“The 24 Residences”), which is across Winnetka Boulevard from the Project Site. Therefore, lighting from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of artificial light, and this impact would be less than significant.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets or in surface parking lots, exterior building windows, and surfaces of brightly painted buildings. Glare currently exists at the Project Site from windows of the existing building as well as automobiles parked in the surface parking lot. The Project would maintain these existing sources of glare and the proposed use would provide a similar amount of glare as currently exists at the Project Site (from the windows and solar panels on the reutilized building as well as automobiles parked in the proposed surface parking). In addition, all exterior windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, glare from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of glare, and this impact would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Like the Project, this related project is

subject to applicable development standards, which results in individual review of the visual character of each project, to ensure consistency with design standards and that individual projects are compatible with existing land uses. Therefore, although development of the Project in combination with the related project would result in a general intensification of land uses in an already urbanized area of the City, the Project would not combine with the related project to generate a significant cumulative impact with respect to scenic vistas, views, or visual character.

As it relates to light and glare, development of the Project in combination with the related project would result in an intensification of land uses in an already urbanized area of the City that currently maintains an elevated level of ambient light and glare. As such, the Project and the related project would contribute to ambient light levels within the surrounding area. However, this is a heavily urbanized area and the presence of additional nighttime illumination resulting from the Project and the related project would not represent a substantial alteration to the existing nighttime visual environment. For these reasons, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project Site is zoned [Q]M2-1 and P-1 and the General Plan land use designation for the Site is Light Manufacturing. The Site is developed with a multiplex theater building and an associated surface parking lot. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.² Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.³ The Project Site is zoned [Q]M2-1 and P-1 and no Williamson Act contract applies to the Project Site. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to cause the rezoning of forest land or timberland. The Project Site is currently zoned [Q]M2-1 and P-1 and is not zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or the conversion of forest land to a non-forest use. The Project Site is currently zoned [Q]M2-1 and P-1, and is currently developed with a multiplex theater building and an associated surface

² State of California Department of Conservation, Farmland Mapping and Monitoring Program, <https://maps.conservation.ca.gov/DLRP/CIFF/>, October 20, 2023.

³ State of California Department of Conservation, Williamson Act Program, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed October 20, 2023.

parking lot. The Project Site is not used as forest land, and therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized and the Project Site is currently developed with a multiplex theater building and an associated surface parking lot. The Project Site does not contain any agricultural or forest land. As such, the Project would not result in the conversion of farmland to a non-agricultural use or the conversion of forest land to a non-forest use, and no impact would occur.

Cumulative Impacts

As described above, the Project would not result in any impacts related to agricultural and forestry resources, and the Project area is developed with urban land uses. The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction, and is not located on a site that contains agricultural or forestry resources. Therefore, no cumulative impacts would occur with respect to agricultural and forestry resources.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following, which is included in Appendix A of this IS/MND:

- A Air Quality and Greenhouse Gas Emissions Technical Modeling, Noah Tanski Environmental Consulting (NTEC), October 2023.

Regulatory Framework

Federal

Clean Air Act

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

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation’s public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), sulfur dioxide (SO₂), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and lead.

**Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County**

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O ₃	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m ³)	Non-attainment	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter – PM ₁₀	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	-	-
Fine Particulate Matter – PM _{2.5}	24-hour	-	-	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Attainment
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Attainment
Nitrogen Dioxide – NO ₂	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Attainment

Sulfur Dioxide – SO ₂	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m ³	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m ³	Non-attainment
Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations . Accessed October 6, 2023.					

State

California Clean Air Act

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

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The State standards and attainment/non-attainment are also shown in Table III-1, above.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs)

and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.⁴ The recommendations are advisory and should not necessarily be interpreted as defined “buffer zones”; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

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

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance: This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to

⁴ CARB, *Air Quality and Land Use Handbook, A Community Health Perspective*, April 2005.

prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2022 Air Quality Management Plan

SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS (Connect SoCal), SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.⁵ HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

⁵ SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

Local

City of Los Angeles General Plan Air Quality Element

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

- Goal 1:** Good air quality in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.
- Goal 4:** Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air

pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.^{6,7}

Carbon Monoxide – CO

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

Ozone – O₃

O₃ is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_x emissions is automobile exhaust. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O₃ irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO₂

NO₂ is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO₂ may even contribute to the development of asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

⁶ USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

⁷ SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

Sulfur Dioxide – SO₂

Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO₂ may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO₂, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM₁₀ and PM_{2.5})

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM₁₀) or even less than 2.5 microns (PM_{2.5}) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM₁₀ and PM_{2.5} include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

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

Toxic Air Contaminants

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

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential

cancer risk from vehicle traffic.⁸ Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.⁹ In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.¹⁰

Volatile Organic Compounds

Volatile organic compounds (VOCs) are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_x, CO, SO₂...) and contribute to the formation of photochemical smog.

Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O₃, PM_{2.5}, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O₃, PM₁₀, and PM_{2.5}. Table III-1, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas (“SRAs”) throughout the Basin. The Project is located in SCAQMD’s SRA No. 6, “West San Fernando Valley.” Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in SRA No. 6 from 2019 through 2021. As shown, the eight-hour Federal and State standard for O₃ was exceeded 86 times during this three-year period, and the State one-hour standard was exceeded 19 times. The Federal standard for PM_{2.5} was exceeded 3 times. CO,

⁸ CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

⁹ SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.

¹⁰ CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

NO₂, and SO₂ levels did not exceed their respective CAAQS or NAAQS during this period. Data for PM₁₀ and lead is not available for SRA No. 6.

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

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2021
Ozone – O₃			
Maximum 1-hour Concentration (ppm)	0.101	0.142	0.110
Maximum 8-hour Concentration (ppm)	0.087	0.115	0.083
Days > 0.070 ppm (Federal/State 8-hour standard)	6	49	31
Days > 0.09 ppm (State 1-hour standard)	1	14	4
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	2.6	2.0	2.6
Maximum 8-hour Concentration (ppm)	2.2	1.7	1.9
Days > 35 ppm (Federal 1-hour standard)	0	0	0
Days > 20 ppm (State 1-hour standard)	0	0	0
Days > 9.0 ppm (Federal/State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO₂			
Maximum 1-hour Concentration (ppb)	64.4	57.2	54.2
Days > 100ppb (Federal 1-hour standard)	0	0	0
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µm/m ³)	N/A	N/A	N/A
Days > 150 µg/m ³ (Federal 24-hour standard)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	30.00	27.60	55.5
Days > 35 µg/m ³ (Federal 24-hour standard)	0	0	3
Sulfur Dioxide – SO₂			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 75 ppb (Federal 1-hour standard)	N/A	N/A	N/A
Days > 250 ppb (State 1-hour standard)	N/A	N/A	N/A
Days > 40 ppb (State 24-hour standard)	N/A	N/A	N/A
Lead - Pb			
Maximum Monthly Average Concentration (µg/m ³)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m ³)	N/A	N/A	N/A
N/A = data not available ppm = parts per million of air, by volume ppb = parts per billion of air, by volume µg/m ³ = micrograms per cubic meter Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year . Accessed October 5, 2023.			

Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize risk from air toxics across the Air Basin. Based on the MATES V model, the calculated cancer risk from air toxics in the Project's zip code (91311) is approximately 310 in one million, which is lower than the Air Basin's average risk of 454 per one million. The air toxics risk in the Project's zip code is less than it is for 84.0% of the population with the air basin.¹¹

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to the Draft CalEnviroScreen 4.0, the Project's census tract is ranked 61st percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 88th percentile, indicating that its pollution burden is above average for the State.¹²

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analyses, the South Coast Air Quality Management District (SCAQMD) considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours, but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that localized significance thresholds (LSTs) based on shorter averaging periods, such as the NO₂ and CO LSTs, may also be applied to receptors such as commercial

¹¹ SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A207&views=view_1. Accessed October 5, 2023.

¹² Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. https://experience.arcgis.com/experience/4af93cf9888a424481d2868391af2d82/page/home/?data_id=dataSource_2-1754d6afdb4-layer-9%3A4973. Accessed October 5, 2023.

and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.¹³

The Project Site is in a neighborhood that consists of mainly commercial and industrial land uses. As a result, there is only one sensitive receptor in the vicinity of the Project Site, “The 24,” which is a multi-family residential building located at 9254 Winnetka Avenue. “The 24” is located approximately 460 feet east of the Project Site where the nearest construction/renovation activities would occur, though it is approximately 150 feet east of the Project Site’s driveway along Winnetka Avenue. Additional residential buildings are currently under construction as part of an expansion of “The 24” residential campus. These future residential buildings would be setback at a similar or greater distance from the Project Site as the existing residential building at 9254 Winnetka Avenue. It is uncertain if these future residential buildings would be completed and occupied prior to construction of the Project, but the following analysis conservatively assumes that they would be completed, occupied, and therefore sensitive to the Project’s air quality impacts. Given their similar setback and orientation from the Project Site, the existing and future residential buildings are analyzed as a single receptor – collectively, “The 24 Residences.”

Other nearby receptors where workers or other users may be present for one to eight or more hours include a multitude of commercial, industrial, and other land uses surrounding the Project Site. The nearest such land uses to the Project include warehouse and commercial uses located along Oso Avenue and Prairie Street, approximately 85 feet to the west and north, respectively. Receptors that are farther from the Project Site than the previously identified receptors would experience lesser impacts.

Existing Project Site Emissions

The Project Site currently contains a 3,666-seat movie theater, a 3,415 square-foot fitness studio/gym, and a 3,464 square-foot restaurant use. The rest of the site consists of surface parking area and minor landscaping in support of these uses. However, neither the movie theater nor the frozen yogurt restaurant is currently operational. Table III-3 provides an estimate of daily pollutant emissions associated with the operating fitness studio/gym land use, inclusive of its related vehicle trips and mobile source emissions. The estimated emissions are provided for informational purposes only and have not been factored into any subsequent analyses.

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

**Table III-3
Project Site – Estimated Daily Operations Emissions from Existing Uses**

Emissions Source	Emissions in lbs per day ^A					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	0.77	0.67	6.66	0.01	1.21	0.31
Area	0.11	<0.01	0.15	<0.01	<0.01	<0.01
Energy	<0.01	0.03	0.03	<0.01	<0.01	<0.01
Net Regional Total	0.88	0.70	6.83	0.01	1.21	0.32
^A Some figures may not add up properly due to rounding. Source: NTEC, 2023. Modeling included in Appendix A of this IS/MND.						

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

Less Than Significant Impact. The following analysis assesses the Project’s consistency with the SCAQMD 2022 AQMP and SCAG’s 2020-2045 RTP/SCS. The 2022 AQMP’s projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS, which are themselves largely based on growth forecasts from local governments like the City of Los Angeles; therefore a project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

First, the Project’s development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. The Project Site is zoned [Q]M2-1 and P-1, which would permit the Project’s use with the requested zone change for removal of the [Q] condition. Therefore, RTP/SCS assumptions about population and employment growth in the City accommodate the Project on this Site. Second, development of the Project would also be consistent with land use patterns and smart growth policies regarding Priority Growth Areas (PGAs). PGAs such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the SCAG region’s total land area, but the 2020-2045 RTP/SCS anticipates that 74 percent of new employment growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, leveraging transit investments, and conserving the region’s resource areas. Thus, the 2020-2045 RTP/SCS emphasizes new infill development in PGAs – especially higher intensity infill projects that replace low-intensity uses – and assumes a significant increase in employment density in such locations. Projects fitting this land use pattern are consistent with the 2020-2045 RTP/SCS.

The Project Site is located within multiple PGAs (e.g., HQTAs and in or near the Valley Job Center). It is currently improved with a commercial building and large surface parking area, and two of the Project Site’s three existing tenant spaces are currently non-operational. Therefore, the existing uses are not fully leveraging the Site’s location within multiple PGAs. Development of the Project

would increase employment at the Site and would provide the opportunity for employees and other Project users to utilize nearby high quality transit options, which would reduce vehicle trips and VMT. Given these considerations, the Project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals. The Project would not result in growth – or accompanying emissions – that are unaccounted for by the 2020-2045 RTP/SCS or the 2022 AQMP. Projects that are consistent with the 2020-2045 RTP/SCS are part of the regional solution for meeting the 2022 AQMP’s air pollution reduction goals. The Project would not have a significant long-term impact on the region’s ability to meet state and federal air quality standards.

City of Los Angeles Policies

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City’s clean air goals. As shown below in Table III-4, the Project would be consistent with the applicable policies of the Air Quality Element.

**Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
Goal 1 – Good air quality and mobility in an environment of continued population growth and healthy economic structure.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards. And as discussed further below, construction and operation of the Project would not result in exceedances of ambient air quality standards and thresholds.
Objective 1.1 – It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	Consistent. As explained above, the Project would not interfere with SCAQMD’s 2022 AQMP and would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards.
Objective 1.3 – It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	Consistent. The Project would minimize its fugitive dust particulate emissions via compliance with SCAQMD rules. The Project would not include the development of unpaved roads or parking lots.
Goal 2 – Less reliance on single-occupant vehicles with fewer commute and non-work trips.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility and reduce reliance on single-occupant vehicle trips. The Project’s location within a HQTA and in or near the Valley Job Center would promote the use of alternative transportation modes.
Objective 2.1 – It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	Consistent – As explained above, the Project would not interfere with SCAQMD’s 2022 AQMP and would be consistent with the latest land use and transportation planning strategies to reduce VMT while improving mobility and advancing

**Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
	attainment of state and federal air quality standards.
Objective 2.2 – It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	Consistent. The Project's location within a HQTAs and in or near the Valley Job Center would promote the use of alternative transportation modes.
Objective 3.1 – It is the objective of the City of Los Angeles to increase the portion of work trips made by transit to levels that are consistent with the goals of the AQMP and the Congestion Management Plan.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies to promote use of alternative transportation modes, including transit.
Objective 3.2 – It is the objective of the City of Los Angeles to reduce vehicle traffic during peak periods.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies that emphasize use of alternative transit modes and reduce VMT, which reduces vehicle traffic.
Goal 4 – Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies to improve mobility while advancing attainment of state and federal air quality standards.
Objective 4.1 – It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	Consistent. The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Objective 4.2 – It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.	Consistent. As explained above, the Project would be consistent with the latest land use and transportation planning strategies to reduce VMT. The Project's location within a HQTAs and Job Center would promote the use of alternative transportation modes.
Objective 4.3 – It is the objective of the City of Los Angeles to ensure that land use plans separate major sources of air pollution from sensitive receptors such as schools, hospitals, and parks.	Consistent. The Project does not propose a major source of air pollution. The Project's air quality impacts are analyzed in this document, and all Project impacts with respect to air quality – including impacts on nearby sensitive receptors – would be less than significant.
Goal 5 – Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures	Consistent. As explained, the Project would be consistent with the latest land use and transportation planning strategies to reduce VMT and corresponding fossil fuel use. The Project

**Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
including passive methods such as site orientation and tree planting.	would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Objective 5.2 – It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	Consistent. As noted above, the Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Source: NTEC, 2023.	

Conclusion

To summarize the analysis in response to Threshold (a): (1) Project-related growth would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections; (2) the Project would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions; (3) to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans, and its impact with respect to Threshold (a) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

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

Construction

Construction of the Project would primarily consist of renovations to the existing movie theater building and parking lot. The movie theater building would be converted into showroom, delivery preparation, parts storage, and service areas in support of the delivery hub and service center use. Internal demolition and construction would be required to facilitate this conversion. Improvements to the parking lot would involve reconfiguring curbs, islands, and striping, as well

as installing EV chargers that would be used for preparation of the new vehicles. The Project would not involve mass grading activities or the ground-up construction of any new buildings. Implementation of these improvements would last up to approximately eight months. The Project's construction activities were grouped into the following phases:

- Demolition
- Building Construction
- Paving
- Architectural Coating

The Project's unmitigated maximum daily regional and local emissions from these construction phases, as estimated using SCAQMD's CalEEMod version 2022 model, are shown below in Table III-5. Regional thresholds and LSTs for each air pollutant are also shown for comparison. The estimated emissions fully account for the potential for overlapping phases of construction, such as the overlap of building construction and architectural coatings. As shown, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Local emissions also would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

**Table III-5
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)**

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Emissions						
2024	0.55	9.38	8.25	0.04	3.12	0.77
2025	58.8	17.2	21.0	0.06	4.07	1.19
Maximum Regional Emissions	58.8	17.2	21.0	0.06	4.07	1.19
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
Demolition (2024)	0.43	4.21	5.89	0.01	1.81	0.37
Demolition (2025)	0.41	4.10	5.87	0.01	1.80	0.36
Building Construction	0.75	7.18	10.2	0.02	0.29	0.26
Paving	3.51	3.73	4.99	0.01	0.17	0.16
Architectural Coating	54.27	1.18	1.52	<0.01	0.04	0.03
Overlap of Building Construction, Paving, and Architectural Coating	58.53	12.09	16.71	0.03	0.5	0.45
Maximum Localized Emissions	58.53	12.09	16.71	0.03	1.81	0.45
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	-	No	No	-	No	No

Operation

Emissions associated with the Project's operations were also calculated using CalEEMod version 2022. As shown below in Table III-6, the Project would not result in major sources of air pollution. The Project's maximum daily emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would they exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. As a result, the Project's operations-related emissions impacts on regional and localized air quality would be less than significant.

**Table III-6
Regional and Localized Operational Emissions**

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	6.52	5.32	54.8	0.12	11.3	2.93
Area	3.77	0.04	5.17	<0.01	0.01	0.01
Energy	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Regional Emissions: ^A	10.3	5.32	60.0	0.12	11.3	2.94
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Thresholds?	No	No	No	No	No	No
Localized Emissions:	3.77	0.04	5.17	<0.01	0.01	0.01
Localized Significant Thresholds	-	103	426	-	1	1
Exceed Threshold?	-	No	No	-	No	No
Note: ^A Some emissions may not add up due to rounding and differences between summer and winter emissions. Source: NTEC, 2023. Modeling included in Appendix A of this IS/MND.						

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

Less Than Significant Impact.

Construction

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

The primary TAC that would be generated by construction activities is diesel PM, which would be emitted from the exhaust pipes of diesel-powered construction vehicles and equipment. According

to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day would contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately eight months, and daily diesel PM emissions would vary considerably day by day, and by phase, over this duration. As shown earlier, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. And as explained previously, the maximum daily construction emissions are conservative estimates that are not likely to occur on a given construction workday, let alone every day for the entirety of construction. Given these considerations, TAC emissions from the Project's construction equipment are expected to result in less than significant health risk impacts.

Operation

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs. Additionally, the Project does not propose sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes or warehouse distribution facilities. While the Project does propose an automobile service center, it would not include paint booths or metal-plating facilities that emit air pollutants of concern, according to CARB. The types of services facilitated by the Project would not be substantial sources of TACs. As such, the Project's operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

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

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors and would not include any land uses typically associated with unpleasant odors and local

nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.¹⁴ Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

¹⁴ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>, August 2003.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based in part on the following, which is included in Appendix B of this IS/MND:

B Tree Report, Carlberg Associates, December 29, 2023.

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?

No Impact. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited above. The Project Site is located in an urbanized and developed area of the City, and is currently developed with a multiplex theater building and an associated surface parking lot. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.¹⁵ No hydrological features are present on the Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. No riparian areas or other sensitive natural communities are located on the Project Site. Thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities, and no impact would occur.

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

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. A review of the National

¹⁵ NavigateLA, Significant Ecological Area layer: <http://navigateLA.lacity.org/navigateLA/>, accessed October 20, 2023.

Wetlands Inventory identified no wetlands or water features on the Project Site. Therefore, no impact would occur.¹⁶

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?

Less Than Significant Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is currently developed with a multiplex theater building and an associated surface parking lot, and does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed and does not contain any major water bodies that would contain or support habitat for native resident or migratory bird species. According to the tree report prepared for the Project Site (included as Appendix B to this IS/MND, there are 257 trees located on the Project Site, although one of the trees is dead. The Project would remove 11 on-site non-protected trees, while the remaining 246 trees would be preserved. During Project construction activities, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant.

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

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance No. 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica* var. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).¹⁷ In addition, in December 2020, Mexican Elderberry (*Sambucus Mexicana*) and Toyon (*Heteromeles arbutifolia*) were added to the class of “protected trees”

¹⁶ U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>, accessed October 20, 2023.

¹⁷ City of Los Angeles, Ordinance No. 177404, effective April 23, 2006.

(Ordinance No. 186873). According to the tree report prepared for the Project Site (included as Appendix B of this IS/MND), there are 257 trees on the Project Site, no public right-of-way trees, and no off-site trees with canopies overhanging the Project Site. Of these trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of 11 on-site non-protected trees, while the remaining trees would be preserved. The existing trees that would be removed as part of Project construction would be replaced according to the Urban Forestry Division requirements. As none of the trees located on the Project Site are protected trees, a less than significant impact would occur.

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

No Impact. A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of the City, and is currently developed with a multiplex theater building and an associated surface parking lot. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Site,¹⁸ and the Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.¹⁹ Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

The Project Site is located in a highly urban area that likely does not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, or sensitive natural communities. Further, the Project area is not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. The only identified related project is the mixed-use project located east of the Project Site across Winnetka Avenue, which is currently under construction. It is assumed that like the Project, this related project would have been required to comply with the requirements of the MBTA as well as the City's Protected Tree Ordinance and the City's requirements regarding street tree removal and replacement. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

¹⁸ NavigateLA, Significant Ecological Area layer: <http://navigateLA.lacity.org/navigateLA/>, accessed October 20, 2023.

¹⁹ City of Los Angeles General Plan Conservation Element, Exhibit B2.

V. CULTURAL RESOURCES

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

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

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

The existing building on the Project Site was built in 1997 and is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, the existing building was not identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review. As such, the Project would result in no impact with respect to historic resources.

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

Less Than Significant with Mitigation Incorporated. State CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that

fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities, including for the existing commercial building and associated parking lot. As discussed in the Geotechnical Investigation prepared for the Project Site (included in Appendix C of this IS/MND), artificial fill soils were encountered at most of the boring locations, extending from the ground surface to depths of 2.5 to 6.5 feet.²⁰ While the Project does not include the construction of any subterranean levels and proposes the reuse of the existing building and surface parking lot, the Project would still require excavation for the installation of utilities, which could have the potential to disturb existing but undiscovered archaeological resources, however unlikely due to the artificial fill soils present at the Project Site.

The City has established a standard condition of approval to address the inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey or report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. In addition, as discussed further below under "Tribal Cultural Resources," the Project would implement Mitigation Measures MM-TCR-1 through MM-TCR-3 regarding the inadvertent discovery of such resources. With implementation of the City's established condition of approval to address any inadvertent discovery of archaeological resources, as well as MM-TCR-1 through MM-TCR-3, Project impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in an urbanized area, and is developed with an existing commercial building and associated parking lot. As discussed above, while the Project does not include the construction of any subterranean levels and proposes to reuse the existing building and surface parking lot, the Project would still require excavation for the installation of utilities. No human remains are known to exist at the Project Site, and although unlikely due to the presence of artificial fill soils at the Project Site, there is a possibility that human remains could be encountered during excavation activities. Should human remains inadvertently be encountered, the Project would comply with the City's standard condition of approval for inadvertent discovery of human remains, which states the following:

²⁰ Geotechnical Investigation, SoCalGeo, November 5, 2021, page 1, included in Appendix C of this IS/MND.

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

Stop immediately and contact the County Coroner:

1104 N. Mission Road

Los Angeles, CA 90033

323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or

323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods as provided in Public Resources Code Section 5097.98. If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

In addition, as discussed further below under "Tribal Cultural Resources," the Project would implement Mitigation Measures MM-TCR-1, MM-TCR-2, and MM-TCR-3 regarding the inadvertent discovery of such resources, including human remains. Compliance with the City's standard condition of approval described above, as well as implementation of MM-TCR-1, MM-TCR-2, and MM-TCR-3, would ensure appropriate treatment of any potential human remains discovered during Project construction activities. Therefore, the Project's impacts on human remains would be less than significant.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historic resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. The Project would implement standard City conditions of approval, as well as mitigation measures MM-TCR-1, MM-TCR-2, and MM-TCR-3, and would comply with State regulations related to the inadvertent discovery of any archaeological resources and/or human remains, if necessary. The only identified related project is the mixed-use project located east of the Project Site, across

Winnetka Avenue, which is currently under construction. Like the Project, this related project would be subject to regulatory requirements related to the inadvertent discovery of archaeological resources and human remains. Therefore, cumulative impacts with respect to historical resources, archaeological resources, and human remains would be less than significant.

VI. ENERGY

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

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

Less Than Significant. This analysis relies on Appendix F of the CEQA Guidelines, which was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.”

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix G and the *L.A. CEQA Thresholds Guide*, the following eight factors will be considered in determining whether this threshold of significance is met:

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;

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and
8. Whether the project conflicts with adopted energy conservation plans.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

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

Construction

Electricity

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction (formally provided as Project Design Feature PDF-2). Moreover, construction electricity usage would replace the electricity usage associated with the existing buildings. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

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

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.²¹ In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025,

²¹ California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

subsection (h)) to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.²² In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips.

Electricity

Buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 1,650,568 kWh per year (refer to Table VI-1). In addition, by 2020, LADWP was required to procure at least 33 percent of their energy portfolio from renewable sources. The current sources procured by LADWP include wind, solar, and geothermal 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.²³ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs as well as the installation of solar panels on 15 percent of the roof area.

Based on LADWP's 2022 SLTRP, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (encompassing the Project's 2025 buildout year) is estimated to be approximately 20,874 GWh of electricity²⁴ As such, the Project-related increase in annual electricity consumption

²² California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

²³ CEC, Utility Annual Power Content Labels for 2021, www.energy.ca.gov/pcl/labels/.

²⁴ 2022 Power Strategic Long-Term Resource Plan, December 2022, LADWP, Appendix A.

of 1,650,568 kWh per year would represent approximately 0.008 percent of LADWP’s projected sales in 2025.

**Table IV-1
Estimated Project Electricity Demand**

Land Use	Size	Total (kw-h/yr)¹
Automobile Care Center	118,784 sf	1,197,244
Parking Lot	--	453,324
Total		1,650,568
sf =square feet kw-h = kilowatt-hour yr = year ¹ Calculated via CalEEMod. Refer to Appendix A of this IS/MND. Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.		

Natural Gas

During operation, the Project is not expected to result in the consumption of natural gas. Accordingly, natural gas would not be supplied to support the Project’s operational activities, and thus there would be no natural gas demand during operation of the Project.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted previously, the Project Site is currently improved with mostly surface parking area, and two of the Project Site’s three existing tenant spaces are currently non-operational. Therefore, existing Project uses are not fully leveraging the Site’s location within a HQT. Development of the Project would increase employment at the Site and provide the opportunity for employees and other Project users to utilize local transit options, which would reduce vehicle trips and VMT. Further, the RTP/SCS also identifies “Job Centers,” which represent areas with significantly higher employment density than surrounding areas. The RTP/SCS seeks to prioritize employment growth in existing Job Centers to leverage existing density and infrastructure. The Project is located in or near the Valley Job Center, which the RTP/SCS identifies as being generally north of Roscoe Boulevard and east of Topanga Canyon Boulevard. Therefore, development of the Project would also be consistent with the RTP/SCS’s strategies concerning Job Centers. Given these considerations, the Project is appropriately located and would support the RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in order to reduce regional VMT and related GHG emissions.

Further, the Project Site is currently served by many local transit lines and regional/commuter lines via stops located within convenient walking distance along Winnetka Avenue, Plummer Avenue, Nordhoff Street, and other nearby streets. Transit service in the Project vicinity is currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro,

routes 166, 167, and 243) and the Antelope Valley Transit Authority (AVTA, route 787). Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide approximately 28 bicycle parking spaces for employees and visitors.

During Project operations, vehicles traveling to and from the Project Site are also assumed to comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. 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. It is anticipated that the future Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. In addition, as the Project proposes a service center for electric vehicles, many of the vehicle trips to the Project Site would be via electric vehicles, which would reduce the Project's consumption of gasoline and diesel. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

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

Construction

As discussed above, electricity 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, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.008 percent of LADWP's projected sales in 2025-2026. The Project is not expected to result in the demand for natural gas during operation. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's service provisions.

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

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak

load conditions, LADWP's power system experienced an all-time high peak of 6,432 MW on August 31, 2017.²⁵ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2018, the base case peak demand for the power grid is 5,820 MW.²⁶ In comparison to the LADWP power grid base peak load of 5,820 MW in 2018, the Project would represent approximately 0.002 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 enough to account for future electrical demand by the Project.²⁷ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity usage during Project operations presented on Table VI-1 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. In addition, the Project is not expected to result in the demand for natural gas during operation. Therefore, Project construction and operational activities would comply with existing energy standards.

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 traveling to and from the Project Site are assumed to comply with CAFÉ fuel economy standards. 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. In addition, as the Project proposes a service center for electric vehicles, many of the vehicle trips to the Project Site would be via electric vehicles, which would reduce the Project's consumption of gasoline and diesel. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) *Effects of the Project on Energy Resources*

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2022 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity.

²⁵ LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

²⁶ LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

²⁷ LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

Natural gas supplied to the 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 United States as well as Canada. According to the U.S. Energy Information Administration (EIA), as of January 2021, the United States currently has about 86 years of natural gas reserves.²⁸ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operational activities would have a negligible effect on natural gas supply.

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.²⁹ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). 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. In addition, as the Project proposes a service center for electric vehicles, many of the vehicle trips to the Project Site would be via electric vehicles, which would reduce the Project's consumption of gasoline and diesel. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

Due to the Project Site location, most on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: 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. 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.³⁰

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

Approximately 527,839 thousand barrels of crude oil (approximately 22.2 billion gallons) were supplied to California refineries in 2022.³¹ Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves. As noted previously, the Project Site is currently improved with mostly

²⁸ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed October 24, 2023.

²⁹ BP Global, <https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html>, accessed November 15, 2021.

³⁰ CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, <https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&IR=0&mC=36.416862115300304%2C-120.421142578125&zL=8>, accessed November 15, 2021.

³¹ California Energy Commission, Oil Supply Sources to California Refineries, <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/annual-oil-supply-sources-california>, accessed October 25, 2023.

surface parking area, and two of the Project Site's three existing tenant spaces are currently non-operational. Therefore, existing Project Site uses are not fully leveraging the Site's location within a HQT. Development of the Project would increase employment at the Site and provide the opportunity for employees and other Project users to utilize local transit options, which would reduce vehicle trips and VMT. Further, the RTP/SCS also identifies "Job Centers," which represent areas with significantly higher employment density than surrounding areas. The RTP/SCS seeks to prioritize employment growth in existing Job Centers to leverage existing density and infrastructure. The Project is located in or near the Valley Job Center, which the RTP/SCS identifies as being generally north of Roscoe Boulevard and east of Topanga Canyon Boulevard. Therefore, development of the Project would also be consistent with the RTP/SCS's strategies concerning Job Centers. Given these considerations, the Project is appropriately located and would support the RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in order to reduce regional VMT.

Further, the Project Site is currently served by many local transit lines and regional/commuter lines via stops located within convenient walking distance along Winnetka Avenue, Plummer Avenue, Nordhoff Street, and other nearby streets. Transit service in the Project vicinity is currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro, routes 166, 167, and 243) and the Antelope Valley Transit Authority (AVTA, route 787). Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide approximately 28 bicycle parking spaces for employees and visitors.

7) *The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements*

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code. The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

8) *Whether the Project conflicts with adopted energy conservation plans.*

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency

Standards, which have been incorporated into the City's Green Building Code. With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. As discussed previously, the 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020-2045 RTP/SCS. The Project would provide commercial uses in close proximity to existing public transportation, including Metro and AVTA bus lines. This is evidenced by the Project Site's location within a designated HQTAs. The 2020-2045 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2020-2045 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

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

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include, but are not limited to, the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency. In addition, the Project would implement sustainability measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2020-2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's proximity to existing public transportation would serve to reduce VMT and associated

transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFÉ fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, and as described previously, this related project has already been developed.

Electricity

The Project, in conjunction with the related project, would result in an increased demand for electricity supplies. LADWP's 2022 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost-effective manner. The 2022 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2022 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives.

LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, both the Project and the related project would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

As discussed above, the Project is not expected to use natural gas during either construction or operation. The related project could result in an increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. The related project would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result

in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

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

VII. GEOLOGY AND SOILS

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The analysis in this section is based in part on the following item, which is included as Appendix C of this IS/MND:

C Geotechnical Investigation, SoCalGeo, November 5, 2021.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault

Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigation prepared for the Project (included in Appendix C of this IS/MND), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and the possibility of significant fault rupture at the Project Site is considered to be low.³² Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the Alquist-Priolo Special Studies Zone Map issued by the State Geologist in 2014 for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. The Project involves the reuse of the existing building. However, any Project construction activities would be subject to compliance with existing state and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical report prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site, and Project impacts with respect to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region. However, the Project does not include the types of activities, such as mining operations, boring of large areas, the extraction or injection of oil or groundwater, horizontal drilling, or other activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking. Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake.

The Project proposes to reuse the existing building. In addition, as with any new development in the State of California, any Project construction activities would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be

³² Geotechnical Investigation, SoCalGeo, November 5, 2021, page 11.

required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

According to the Geotechnical Investigation prepared for the Project Site, the Earthquake Zones of Required Investigation, Canoga Park Quadrangle map, published by the CGS, indicates that the Project Site is not located within a designated liquefaction hazard zone. In addition, based on the lack of groundwater within the upper 25 feet, and the fact that the historic high groundwater level for the Site is 90± feet below the ground surface, liquefaction is not considered to be a design concern for the Project.³³

Project construction activities would not involve the injection of water or any other liquid into the ground. In addition, construction of the Project would be subject to the LABC requirements and recommendations included in the final geotechnical report. As such, liquefaction potential for the Project Site is considered low. Based on the above, development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction, and no impact would occur.

iv. Landslides?

No Impact. The Project Site is relatively flat and is not identified by ZIMAS as being within a landslide hazard zone. Therefore, the potential for landslides is negligible, and the Project would result in no impact with respect to landslides.

³³ Geotechnical Investigation, SoCalGeo, November 5, 2021, page 13.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. During the Project's construction phase, activities such as excavation for utilities and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

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

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

Less Than Significant Impact. As discussed previously, the liquefaction potential at the Project Site is considered low. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. As discussed in the Geotechnical Investigation, the potential for other geologic hazards such as seismically induced settlement, lateral spreading, and subsidence affecting the Project Site are considered low.³⁴ In addition, the

³⁴ Geotechnical Investigation, SoCalGeo, November 5, 2021, page 11.

Project proposes to reuse the existing building and does not include the construction of any new buildings on the Project Site. Therefore, the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and Project impacts would be less than significant.

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

No Impact. Based on the Geotechnical Investigation prepared for the Project Site, soils at the Project Site are considered to have a very low expansive potential.³⁵ In addition, the Project proposes to reuse the existing building and does not include the construction of any new buildings on the Project Site. Therefore, the Project would not cause or exacerbate geologic hazards, and no impact with respect to expansive soils would occur.

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

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

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and is currently developed with a commercial building and associated parking lot. As discussed in the Geotechnical Investigation prepared for the Project Site (included in Appendix C of this IS/MND), artificial fill soils were encountered at most of the boring locations, extending from the ground surface to depths of 2.5 to 6.5 feet.³⁶ While the Project does not include the construction of any subterranean levels, the Project would require excavation for the installation of utilities, which could have the potential to disturb existing but undiscovered paleontological resources, however unlikely due to the artificial fill soils present at the Project Site.

³⁵ [Geotechnical Investigation](#), SoCalGeo, November 5, 2021, page 9.

³⁶ [Geotechnical Investigation](#), SoCalGeo, November 5, 2021, page 1.

However, the City has established a standard condition of approval to address the inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the find. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey or report shall be submitted to the Los Angeles County Museum of Natural History and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with this condition of approval, all activities would be conducted in accordance with regulatory requirements.

Through compliance with the City's established condition of approval to address any inadvertent discovery of paleontological resources, Project impacts would be less than significant.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development as well as CBC and LABC construction standards that are designed to protect public safety. The only identified related project is the mixed-use project located east of the Project Site across Winnetka Avenue, which is currently under construction. Like the Project, it is assumed that this related project was required to comply with CBC and LABC construction standards and requirements. Impacts with respect to paleontological resources are also assessed on a site-by-site basis. All development in the City (including the Project and the related project) that includes ground-disturbing activities is required to adhere to existing State and City regulations and/or any required mitigation measures related to the discovery of paleontological resources. For these reasons, cumulative impacts related to geology and soils would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis in this section is based on the following, which is included in Appendix A of this IS/MND:

- A** Air Quality and Greenhouse Gas Emissions Technical Modeling, Noah Tanski Environmental Consulting, October 2023.

Climate Change Background

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

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).³⁷ Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. Below is a discussion of (1) the plans, policies, and regulations (collectively, the “Applicable GHG Regulations”) that are fundamental to determining whether the Project would have a significant impact on GHG emissions, and (2) the existing conditions under the Applicable GHG Regulations.

State

The State legislature, executive office, and administrative agencies have promulgated various regulations, rules, policies, and strategies that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the “AB 32 Scoping Plan” or 2008 Scoping Plan)
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the “Supplemental FED”)
- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the “First Update” or 2013 Scoping Plan Update)
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target (the “2017 Scoping Plan Update”)
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)

³⁷ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the “2022 Scoping Plan Update”)

Other regulations would also have an indirect effect on the Project’s GHG emissions. The Project’s relation to the following regulations would not be determinative of its CEQA significance, but explanations of these regulations are nonetheless provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

EO S-3-05

In June 2005, Governor Arnold Schwarzenegger signed EO-S-3-05, which had the goal of reducing the State’s GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

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

- By 2010, reduce statewide GHG emissions to 2000 levels.³⁸
- By 2020, reduce statewide GHG emissions to 1990 levels.

AB 32 required the California Air Resources Board (CARB) to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

SB 97

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

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead

³⁸ The 2010 target to reduce GHG emissions to 2000 levels was not met.

agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

- (1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for the cumulative impact analysis.”³⁹

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

SB 375

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

EO-B-30-15

In April 2015, Governor Jerry Brown issued EO B-30-15, which had the goal of reducing the State’s GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

³⁹ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

SB 32

Signed in September 2016 by Governor Brown, SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

On September 10, 2018, Governor Brown issued EO B-55-18, which established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

AB 1297

Governor Gavin Newsom codified the goals outlined in EO-B-55-18 by his signing of AB 1279 in September 2022. AB 1279 requires the state to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal. AB 1297 represents the State's latest – and most stringent – GHG reduction target.

SB 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.⁴⁰

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

Climate Change Scoping Plans

The Scoping Plan is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various

⁴⁰ Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.

sectors to reduce GHG emissions and reach the State’s climate targets. CARB published the 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. 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). The 2017 Scoping Plan Update shifted focus to the newer SB 32 goal of a 40 percent below 1990 levels by 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 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 the aforementioned targets, 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. 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 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 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 VIII-1
Estimated Statewide GHG 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 BAU 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)
<i>Notes:</i>	

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.

Table VIII-2 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p>Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) <i>The California Climate Crisis Act</i></p>	<p>AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage (CCUS) technologies.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update.</p>
<p>Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) <i>Carbon Capture, Removal, Utilization, and Storage Program</i></p>	<p>SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology.</p> <p>The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project.</p> <p>The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.</p>
<p>Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022)</p>	<p>SB 846 extends the Diablo Canyon Power Plant’s sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission</p>

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<i>Diablo Canyon Powerplant: Extension of Operations</i>	(CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022) <i>Clean Energy, Jobs, and Affordability Act of 2022</i>	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) <i>Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors</i>	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) <i>Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases</i>	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<p>hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses.</p> <p>This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.</p>
<p>Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022)</p> <p><i>California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands</i></p>	<p>AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience.</p> <p>This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO₂, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible.</p> <p>This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.</p>
<p>Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022)</p> <p><i>Hydrofluorocarbon gases: sale or distribution</i></p>	<p>SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California’s economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.</p>
<p>Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021)</p> <p><i>Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects</i></p>	<p>SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO₂ removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding.</p>

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<p>CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.</p>
<p>Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021)</p> <p><i>Greenhouse Gases: Cement Sector: Net-zero Emissions Strategy</i></p>	<p>SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state’s cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must:</p> <ul style="list-style-type: none"> • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. <p>The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.</p>
<p>Executive Order N-82-20</p>	<p>Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California’s land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state’s carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.</p> <p>CO2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to:</p> <ul style="list-style-type: none"> • Establish a baseline assessment of California’s biodiversity that builds upon existing data and can be updated over time.

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> • Analyze and project the impact of climate change and other stressors in California’s biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. <p>CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state’s process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production.</p> <p>The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.</p>
Executive Order N-79-20	<p>Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are:</p> <ul style="list-style-type: none"> • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. <p>The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above.</p> <p>The 2022 Scoping Plan Update modeling reflects achieving these targets.</p>
Executive Order N-19-19	<p>Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that:</p> <ul style="list-style-type: none"> • Includes a proactive strategy for the state’s pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth

Table VIII-2

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<p>potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change.</p> <ul style="list-style-type: none"> Aligns with the fiduciary responsibilities of the California Public Employees’ Retirement System, California State Teachers’ Retirement System, and the University of California Retirement Program. <p>Executive Order N-19-19 directs the State Transportation Agency to leverage more than \$5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state’s 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government’s carbon footprint. Finally, it tasks CARB with accelerating progress toward California’s goal of five million ZEV sales by 2030 by:</p> <ul style="list-style-type: none"> Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. <p>The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.</p>
<p>Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019)</p> <p><i>Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program</i></p>	<p>Sea level rise, combined with storm-driven waves, poses a direct risk to the state’s coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California’s coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy’s jurisdiction.</p>
<p>Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019)</p> <p><i>Coastal Protection: Climate Adaption: Project</i></p>	<p>This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any</p>

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p><i>Prioritization: Natural Infrastructure: Local General Plans</i></p>	<p>projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.</p>
<p>Executive Order B-55-18</p>	<p>Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:</p> <ul style="list-style-type: none"> • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state’s water supply, water quality, and native plants and animals. <p>This Executive Order also calls for CARB to:</p> <ul style="list-style-type: none"> • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. <p>The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.</p>
<p>Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018)</p> <p><i>California Renewables Portfolio Standard Program: emissions of greenhouse gases</i></p>	<p>Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.</p> <p>The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.</p>
<p>Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018)</p> <p><i>Electric Vehicle Charging Infrastructure: Assessment</i></p>	<p>This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure.</p> <p>This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.</p>

**Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p>Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) <i>Insurance: Climate Change</i></p>	<p>This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.</p>
<p>Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) <i>Near-zero-emission and Zero-emission Vehicles</i></p>	<p>Existing state and federal law set specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds.</p> <p>This bill supports the deployment of cleaner trucks as modeled in the 2022 Scoping Plan Update.</p>

The 2022 Scoping Plan scenario identifies the need to accelerate AB 32’s 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan scenario is summarized in Table 2-1 (starting on page 72) of the 2022 Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in VMT; light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation, ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California’s Legislature and state agencies will continue to collaborate to achieve the state’s climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state’s near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan 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:

- Green New Deal
- Green Building Code
- City of Los Angeles All-Electric Buildings
- General Plan Housing Element (Housing Needs Assessment)
- Mobility Plan 2035

These programs and regulations are discussed below under the section for local GHG regulatory framework.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and

transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

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

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Growth Areas (PGAs) and aims to enhance and build out the region's transit network. PGA's such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for just 4 percent of total land in the SCAG region, but they are projected to accommodate 64 percent of the region's future household growth and 74 percent of the region's future employment growth by 2045.⁴¹ According to the 2020-2045 RTP/SCS, dense infill development in PGAs can help reduce travel distances, increase mobility options, leverage transit investments, and improve access to workplaces and other destinations, reducing VMT and, crucially, associated GHG emissions.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the state's emissions goals.

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Basin and

⁴¹ SCAG, Final 2020-2045 RTP/SCS, September 2020.

developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.⁴² A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.⁴³ The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO_{2e} per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO_{2e} per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO_{2e} per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

Local

City of Los Angeles Green New Deal

In 2007, the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (“LA Green Plan/Climate LA”). This document outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City’s first “Sustainable City pLAn” that was released in 2015. It augments, expands, and elaborates the City’s vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists “Climate Mitigation” (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

⁴² SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, <http://www3.aqmd.gov/hb/2008/081231.a.thm>. Accessed June 23, 2022.

⁴³ SCAQMD, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed June 23, 2022.

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.
- 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.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfills by 2028.
- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019

CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with few exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances, and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratories, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions – more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

City of Los Angeles General Plan Housing Element (Housing Needs Assessment)

The Housing Element of the City's General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. The current RHNA goal for affordable housing within the City is approximately 40 percent of new construction. However, the City's projections show affordable housing comprising 20 percent of new construction, which falls short of the 40 percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Mobility Plan 2035

In August 2015, the City Council adopted the Mobility Plan 2035, which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment in September 2016. The Mobility Plan incorporates "complete streets" principles and lays the foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

Existing Conditions

Existing Statewide GHG Emissions

CARB reports that in 2019, emissions from GHG emissions statewide were 404 MMTCO_{2e}, 27 MMTCO_{2e} below the state's 2020 GHG limit of 431 MMTCO_{2e}. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

Existing Project Site Emissions

The Project Site currently contains a 3,666-seat movie theater, a 3,415 square-foot fitness studio/gym, and a 3,464 square-foot restaurant use. The rest of the site consists of surface parking area and minor landscaping in support of these uses. However, neither the movie theater nor the frozen yogurt restaurant is currently operational. It is estimated that the operating fitness/studio/gym land use generates approximately 256 MTCO_{2e} of annual GHG emissions. This estimate is provided for informational purposes only and has not been factored into any subsequent analyses.

Thresholds of Significance

Pursuant to the Appendix G thresholds, the Project would have a significant impact with respect to GHG emissions if it would:

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

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

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

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).⁴⁴ It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.⁴⁵

⁴⁴ See also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

⁴⁵ See for example: San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR – 2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the 2022 Scoping Plan Update, as well as the City's Green New Deal.

Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. In addition, neither SCAQMD, OPR, CARB, CAPCOA, nor any other state or regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

For informational purposes, the analysis also estimates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy the State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate

increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO₂e per year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.

emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Plans

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction strategies. As discussed previously, the Project will be evaluated for consistency with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2022 Scoping Plan Update provides measures to achieve the State's GHG reduction targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reductions (and corresponding GHG reductions) required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change. This analysis addresses consistency with the Green New Deal's strategies and goals. Thus, if the Project is designed in accordance with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (i.e., SB 375 for the 2020-2045 RTP/SCS and AB 1279 for the 2022 Scoping Plan Update). A consistency analysis is provided and describes the Project's compliance or conflict with performance-based standards included in the applicable portions of the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to building momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA."

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, and funding. Additionally, CAPs need to be monitored and updated as State targets change and new data becomes available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA qualified CAP or as individual measures) aligned with the State's climate

goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions. According to Appendix D, “By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.”

The State also recognizes in Appendix D, Local Actions, of the 2022 Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a project is in alignment with the State’s climate goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State’s climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State’s goals. The State also recognizes the lead agencies’ discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Quantification of Project GHG Emissions

The California Emissions Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, which provided data (e.g., emissions factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

A fundamental difficulty in the analysis of GHG emissions is the global nature of existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing “new” GHG emissions. As a result, there is frequently an inability to conclude whether a project’s GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. For example, if a multi-family residential project replaces an existing supermarket, GHG emissions associated with the existing supermarket would not be totally eliminated because former patrons of the supermarket would still drive and get groceries somewhere else, which would continue to generate associated GHG emissions. GHG emissions associated with the new multi-family residential project would not be totally new, because many residents will have presumably moved there from other housing. Their GHG emissions would be shifted to their new housing, but if the new multi-family residential project has access to high quality transit and walkable destinations, then there is a strong likelihood that the residents’ GHG per capita would be reduced on average by their move to the new project. Notwithstanding these complexities, the

analysis of the Project's GHG emissions is conservative because it assumes all the Project's direct and indirect GHG emissions would be new additions to the atmosphere.

Construction

The Project's construction emissions were estimated using CalEEMod version 2022. Details regarding modeling assumptions are provided in the appendix to this report. CalEEMod calculates emissions from sources such as off-road equipment usage and on-road vehicle travel associated with hauling, delivery, and construction worker trips. GHG emissions during construction were estimated based on the assumptions provided in the appendix. GHG emissions generated by the Project's construction activities reflect the types and quantities of construction equipment that would be used to implement the Project, which would primarily consist of renovations to the existing movie theater building and parking lot. The movie theater building would be converted into showroom, delivery preparation, parts storage, and service areas in support of the delivery hub and service center use. Internal demolition and construction would be required to facilitate this conversion. Improvements to the parking lot would involve reconfiguring curbs, islands, and striping, as well as installing EV chargers. The Project would not involve mass grading activities or the ground-up construction of any new buildings. Implementation of these improvements would last up to approximately eight months.

In accordance with the SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project, assumed to be 30 years. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. Additionally, GHG emission reductions measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that any GHG reduction measures will address construction GHG emissions as part of operational GHG reduction strategies. Thus, total construction GHG emissions were divided by 30 and then added to the Project's annual operational GHG emissions inventory.

Operation

Similar to construction, CalEEMod version 2022 was used to estimate potential direct and indirect GHG emissions generated by the Project's operations. Details regarding modeling assumptions are also provided in the appendix. The analysis addresses GHG emissions from the following sources:

- Area Sources: Emissions associated with the on-site use of powered equipment.
- Energy Sources: Emissions associated with a project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: Emissions associated with a project's related vehicle travel.

- Water/Wastewater Sources: Emissions associated with energy used to pump, convey, delivery, and treat water.
- Solid Waste Sources: Emissions associated with the disposal of solid waste into landfills.
- Refrigerant Sources: Emissions associated with fugitive GHG emissions associated with building air conditioning and refrigeration equipment.

Analysis

The Appendix G thresholds questions concerning GHG emissions are addressed together in the following analysis:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Plan Consistency

Less Than Significant Impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal. As demonstrated below, the Project would be consistent with these applicable GHG reduction plans and policies, and its GHG impact would therefore be less than significant.

2020-2045 RTP/SCS

As noted earlier, SCAG's latest 2020-2045 RTP/SCS (Connect SoCal) is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

Generally, projects are considered consistent with the provisions of regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new, dense housing and/or job growth in infill locations and PGAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. As explained earlier, PGAs such as Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs) account for only four percent of the SCAG region's total land area, but the 2020-2045 RTP/SCS anticipates that 74 percent of new employment growth will occur in these PGAs. According to the 2020-2045 RTP/SCS, dense infill development in PGAs can support the goals

of the 2020-2045 RTP/SCS by reducing travel distances, increasing mobility options, improving access to workplaces, leveraging transit investments, and conserving the region's resource areas. Thus, the 2020-2045 RTP/SCS emphasizes new infill development in PGAs – especially higher intensity infill projects that replace low-intensity uses – and assumes a significant increase in employment density in such locations. Projects fitting this land use pattern are consistent with the 2020-2045 RTP/SCS.

The Project Site is located within multiple PGAs (e.g., HQTAs and in or next to the Valley Job Center). It is currently improved with a commercial building and large surface parking area, and two of the Project Site's three existing tenant spaces are currently non-operational. Therefore, the existing uses are not fully leveraging the Site's location within multiple PGAs. Development of the Project would increase employment at the Site and would provide the opportunity for employees and other Project users to utilize nearby high quality transit options, which would reduce vehicle trips, VMT, and related GHG emissions. Given these considerations, the Project fits the land use pattern adopted and emphasized by the 2020-2045 RTP/SCS and would contribute directly to its goals.

In support of this conclusion, the Project is estimated to generate daily average work-related VMT that is less than the 15.0-mile impact threshold for its Area Planning Commission.⁴⁶ Given that this threshold is itself 15 percent below the Area Planning Commission's average, it means that the Project would result in work-related VMT per capita that is over 15 percent below the Area Planning Commission's average. This would exceed the 2020-2045 RTP/SCS's objective of reducing daily VMT per capita by 5 percent by 2045 across the SCAG region.

Additionally, it is worth noting that the Project proposes a delivery hub and service center for EVs. It is therefore reasonable to expect that a substantial portion of the Project's VMT would be generated by EVs that do not emit tailpipe GHGs. Facilities such as the Project are vital for supporting the State's transition to EVs, which is a critical component of the State's GHG reduction strategies.

2022 Scoping Plan Update

As discussed, jurisdictions that want to take meaningful climate action should look to the following three priority areas: transportation electrification, VMT reduction, and building decarbonization. An assessment of the goals, plans, and policies implemented by the City which would support GHG reduction strategies in the three priority areas is provided below.

⁴⁶ Linscott, Law & Greenspan, Engineers. Transportation Assessment for the Tesla Delivery Hub and Service Center. October 2023.

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 be zero-emission by 2035.

- **Convert local government fleets to zero-emission vehicles (ZEV)**

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 to 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 City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals. The Project would support transition to ZEVs as it proposes a delivery hub and service center for EVs. Facilities such as the Project are vital for supporting the State's transition to EVs, which is a critical component of the State's GHG reduction strategies.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans.**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamlined 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.

EV delivery hubs and service centers are critical components of the “ZEV ecosystem” referenced by this strategy, and the development of such uses is a key step in “ZEV readiness.” Traditional gas-powered automobiles rely on an existing robust ecosystem of dealerships, mechanical shops, oil change shops, tire centers, etc. Statewide transition to broader ZEV use will be contingent on the development of similar facilities for EVs. The Project would contribute to the creation of a ZEV ecosystem and would aid in ZEV readiness as it involves the development of an EV delivery hub and service center, which would support ZEV ownership and maintenance.

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.

- **Reduce or eliminate minimum parking standards in new developments.**
- **Implement parking pricing or transportation demand management pricing strategies.**

The City of Los Angeles Mobility Plan 2035, which is the Transportation Element of the City’s General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of development near transit (within half a mile). These reduction strategies and TDM programs have limited applicability to the Project, which is an auto-related use and therefore would require a substantial number of parking spaces for vehicle storage, in addition to parking for employees, customers, and visitors (for example, customers with EV service appointments will inherently need to bring their EVs to the Project Site, and parking would be required for vehicle storage). However, it is worth noting that the Project would result in the removal of 95 parking spaces on the Site. And as explained below, the Project would be consistent with the Scoping Plan’s VMT-reduction strategies that are applicable to the Project.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.**

The City of Los Angeles Mobility Plan 2035 established a “Complete Streets” planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with the State’s Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing, and other active transportation modes. The Design Guide

establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation, but the Project would be in support of this strategy. As explained earlier, the Project would be located within a HQTAs and a Job Center, and development within these areas is part of the regional strategy to promote transit ridership and active transportation modes, which are themselves central components of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375, which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development, and encourages high-density residential/commercial development along transit corridors.

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS, also referred to as Connect SoCal. The 2020-2045 RTP/SCS’s “Core Vision” prioritizes the maintenance and management of the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City has developed the Complete Streets Design Guide, which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project’s consistency with these strategies is largely demonstrated by its consistency with SCAG’s 2020-2045 RTP/SCS, which is addressed and explained earlier in this report.

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-fired resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial).

- **Adopt all-electric new construction reach codes for residential and commercial uses.**

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 the State's 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 RPS Standard 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, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC and would not include natural gas appliances or other uses.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings. The City and LADWP have established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program, residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water use and associated GHG emissions.

As noted above, the Project would be renovated in accordance with the requirements of the LAMC and would not include natural gas appliances or other uses.

Green New Deal

The Green New Deal provides information as to what the City will do with buildings and infrastructure in its control, and it provides aspirational targets related to housing and development, as well as mobility and transit, that are related to GHG reduction. For example, targets include reducing VMT per capita five percent by 2025 and increasing trips made by walking, biking, or transit 35 percent by 2025. The Green New Deal has also established increased renewables requirements for LADWP. Regarding housing, the Green New Deal aspires that 75 percent of new housing units are built within 1,500 feet of transit by 2035.

The Project would generally comply with these aspirations as it proposes development in an urban infill location that is also within multiple PGAs, which would promote increases in transit and active mode shares. As discussed earlier, the Project is estimated to result in a work-related VMT per capita that is over 15 percent below the average of its Area Planning Commission. Thus, overall, the Project would be consistent with the aspirational targets of the Green New Deal.

Plan Consistency Conclusion

In summary, the Project's location, land use characteristics, and design would be consistent with 2020-2045 RTP/SCS, 2022 Scoping Plan Update, and Green New Deal efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant.

Project GHG Emissions

Construction

As explained earlier, construction of the Project is anticipated to last approximately eight months and would primarily consist of renovations to the existing movie theater building and parking lot. Construction of the Project is estimated to generate approximately 248 MTCO_{2e}. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over a 30-year project lifetime. This results in annual Project construction emissions of approximately 8.3 MTCO_{2e}.

Operation

Table VIII-3 shows the Project's estimated GHG emissions from operations, including the Project's annualized construction-related GHG emissions. Operation of the Project is estimated to result in approximately 6,865.82 MTCO_{2e} per year.

**Table VIII-3
Operations-Related GHG Emissions at Project Buildout**

Source	Emissions (MTCO₂e)
Mobile	2,078
Area	2.42
Energy	519
Water/Wastewater	39.1
Solid Waste	142
Refrigerants	4,077
Construction	8.3
Total Emissions	6,865.82
Source: NTEC, 2023. Modeling included in Appendix A of this IS/MND.	

Conclusion

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project’s GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated goals of reducing statewide emissions to 1990 levels, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB has adopted various plans and regulations to reduce statewide GHG emissions.

Consistent with CEQA Guidelines Section 15064(h)(3), the City as Lead Agency has determined that the Project’s contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB’s 2022 Scoping Plan, the 2020-2045 RTP/SCS, and the City of Los Angeles Green New Deal.

Given the Project’s consistency with these State, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project’s impacts are cumulatively less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based in part on the following item, which is included as Appendix D of this IS/MND:

- D** Phase I Environmental Site Assessment, Partner Engineering and Science, Inc., September 20, 2021.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment. The Project proposes to reuse the existing building and does not include the construction of any new buildings on the Project Site. Any Project construction activities would not use a significant amount of hazardous materials, and the types of hazardous materials that would be used during construction would be typical of those hazardous materials necessary for construction of similar commercial buildings (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). While construction would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

The Project includes reutilization of the existing movie theater building and ancillary uses from the Project Site. To the extent that the Project would require the transport, use, or disposal of small amounts of hazardous materials (such as commercial-grade cleaning solvents, waxes, dyes, toners, paints, or bleach, the use of these materials would be in accordance with existing local, state, and federal regulations, which would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project's impacts related to this issue would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to the public or the environment by releasing hazardous materials into the environment through accident or upset conditions. The following provides a summary of observations from the Phase I Environmental Site Assessment (Phase I ESA) prepared by Partner Engineering, which is included in Appendix D of this IS/MND).

During the site reconnaissance conducted as part of the Phase I ESA, no evidence of reportable quantities of hazardous substances was observed on the Project Site. Small quantities of retail cleaning products and general maintenance supplies were found to be properly labeled and stored with no signs of leaks, stains, or spills. According to the Phase I ESA, the storage and use of cleaning and maintenance supplies does not appear to pose a significant threat to the environmental integrity of the Project Site. In addition, no evidence of current or former aboveground storage tanks (ASTs) or underground storage tanks (USTs) was observed during

the site reconnaissance. Finally, based on the age of the existing buildings, they are not likely to contain asbestos or lead based paint. Based on the analysis contained in the Phase I ESA, Partner Engineering concluded that there are no recognized environmental conditions or other environmental concerns at the Project Site and does not recommend any further investigation of the Project Site. Therefore, this impact would be less than significant.

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

Less Than Significant Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. There are no schools within one-quarter mile of the Project Site. However, the following schools are located in the general Project area (at a greater distance than one-quarter mile): Limerick Avenue Elementary School; Superior Street Elementary School; Our Community School; Alfred B. Nobel Charter Middle School; Chaminade Middle School; Egremont School; and Chatsworth High School.

The types of hazardous materials that would be used during Project construction activities would be typical of those hazardous materials necessary for construction (e.g., paints, solvents, fuel for construction equipment, building materials, etc.), which could emit hazardous emissions. However, the use of these materials would comply with all applicable federal, state, and local regulations. In addition, there are intervening structures and roadways between the schools and the Project Site, and the distance between the Project Site and the nearest schools would ensure that the Project's use of these materials would not pose a hazard to these schools.

While the Project would be operational during school hours, to the extent that the Project would require the use of hazardous materials, such use would be in accordance with existing local, state, and federal regulations. In addition, there are intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis, commonly referred to as the "Cortese List." A significant impact may occur if a project site is included on any of the above lists and poses an

environmental hazard to surrounding sensitive uses. According to the Phase I ESA (included in Appendix D of this IS/MND), the Project Site appears on the following two database listings:

- California Drive-In Theater Inc., listed at 9201 Winnetka Avenue, is identified on the Hazardous Waste Tracking System (HWTS) database. The HWTS account was created in December 1996 and inactivated in October 2000.
- 9210 Winnetka Avenue, listed at 9201 Winnetka Avenue, is identified on the California Integrated Water Quality System Project (CIWQS) database. A terminated stormwater construction permit was issued March 1997 and terminated in April 2004.

Based on the regulatory status and lack of listings in other databases indicating violations and/or a release, these listings are not considered to have created an environmental concern at the Project Site, and this impact 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. A significant impact may occur if a project is located within an airport land use plan, or within two miles of a public airport or public use airport, and would subject people residing or working in the area to a safety hazard or excessive noise levels. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD and the Los Angeles Department of Transportation (LADOT). The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and

pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by City regulations would ensure that Project impacts related to emergency response would be less than significant.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.⁴⁷ Therefore, no impact would occur.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the Project Site boundaries. The only identified related project is the mixed-use project located east of the Project Site across Winnetka Avenue, which is currently under construction. The related project includes a mix of residential, office, and retail uses, and therefore, it is not likely to use large amounts of hazardous materials. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

⁴⁷ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 20, 2023.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed

by the State Water Resources Control Board (SWRCB). The Project proposes to reuse the existing building and does not include the construction of any new buildings or mass grading of the Project Site. The Project would be required to comply with the NPDES General Construction Permit, which satisfies the LARWQCB water quality standards, including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that the Project complies with the LARWQCB standards and therefore that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants (e.g., typical commercial cleaning products, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first ¼-inch of rainfall in accordance with established stormwater treatment protocols. Regulatory compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Regulatory compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities of the Project would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality, and Project impacts related to water quality would be less than significant.

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

No Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The Project Site is located in an urbanized area of the City and is developed with impervious surfaces (commercial building and surface parking lot). During a storm event, stormwater runoff flows to the adjacent roadways

where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

Based on the Geotechnical Investigation conducted for the Project Site (refer to Appendix D-1 of this IS/MND), free groundwater was not encountered during the drilling of any borings. Based on the lack of any water within the borings and the moisture contents of the recovered soil samples, static groundwater is considered to have existed at a depth in excess of 25 feet at the time of the subsurface exploration.⁴⁸ The Project proposes to reuse the existing building and does not include the construction of any new buildings on the Project Site. Therefore, no dewatering would be required. Finally, all water consumption associated with the Project would be supplied by LADWP and not from any groundwater beneath the Project Site. Thus, no impacts related to groundwater would occur as a result of the Project.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation. The Project Site is located in a highly urbanized area of the City, and there are no natural watercourses on the Project Site. As discussed above, the Project Site is currently developed with an existing commercial building and associated parking lot and is therefore completely impervious. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would continue to be impervious, and the Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. 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 $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Project construction activities on the

⁴⁸ Geotechnical Investigation, SoCalGeo, November 5, 2021, page 7.

Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site, as the Project Site is currently developed with a commercial building and associated parking lot, which would be reused. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Regulatory compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Project impacts would therefore be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if a project would substantially increase the probability that polluted runoff would reach storm drains. Runoff from the Project Site currently is and would continue to flow toward the existing storm drain system along Winnetka Avenue.⁴⁹

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the Project would be required to comply with the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters

⁴⁹ Navigate LA, Storm Drains Layer: <http://navigatela.lacity.org/navigatela/>.

inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. Thus, the Project would not have the potential to impede or redirect flood flows and no impact related to this issue would occur.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1280F).⁵⁰ Further, the Project Site is located approximately 13.5 miles north of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

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

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that Project impacts with respect to a water quality control plan or groundwater management plan would be less than significant.

⁵⁰ FEMA Flood Map Service Center, Search by Address, website: <https://msc.fema.gov/portal/search?AddressQuery=9201%20Winnetka%20avenue%2C%20Chatsworth%2C%20ca#searchresultsanchor>, accessed October 20, 2023.

Cumulative Impacts

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

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized area of the City currently developed with commercial uses and associated surface parking. Additionally, the Project Site is entirely surrounded by existing development and roadways. Regarding the surrounding land uses, the Project would provide commercial uses in an area containing similar uses. As such, the Project would be compatible with and complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, no impact would occur.

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

Less Than Significant Impact. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.⁵¹ More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project’s consistency with the requirements and policies

⁵¹ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

of SCAG's RTP/SCS, the City's General Plan (including the Framework Element), and the Chatsworth-Porter Ranch Community Plan, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant, as further described below.

Regional

SCAG's 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (also known as Connect SoCal). The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

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

Project Consistency Discussion

As discussed on Table XI-1, the Project would be substantially consistent with the goals and principles contained in the 2020-2045 RTP/SCS.

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

Goals and Guiding Principles	Consistency Assessment
<p>Goal 1 Encourage regional economic prosperity and global competitiveness.</p>	<p>Not Applicable/Consistent. This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would include commercial uses (Delivery Hub and Service Center for Tesla vehicles) near other industrial and commercial uses in an urbanized area, supporting the regional economic prosperity and global competitiveness of Southern California.</p>
<p>Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.</p>	<p>Consistent. The Project Site is located in a highly urbanized area in the City. The Project includes development of commercial uses (Delivery Hub and Service Center for Tesla vehicles) in close proximity to existing commercial uses, and public transit, including Metro and AVTA bus lines. Furthermore, the Project would be subject to the site plan review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.</p>
<p>Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.</p>	<p>Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.</p>
<p>Goal 4 Increase person and goods movement and travel choices within the transportation system.</p>	<p>Consistent. The Project includes development of commercial uses (Delivery Hub and Service Center for Tesla vehicles) near other industrial and commercial uses. The Project would include 28 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities (including Metro and AVTA bus lines) would further reduce dependence on automobile travel, reducing VMT.</p>
<p>Goal 5 Reduce greenhouse gas emissions and improve air quality.</p>	<p>Consistent. The Project includes development of commercial uses (Delivery Hub and Service Center for Tesla vehicles) near other commercial and industrial uses. The Project would include 28 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. Further, the Project's use as a Delivery Hub and Service Center for Tesla vehicles would support the use of electric vehicles. In addition, the Project Site's location near robust transit opportunities (including Metro and AVTA bus lines) would further reduce dependence on</p>

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

Goals and Guiding Principles	Consistency Assessment
	automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.
Goal 6 Support healthy and equitable communities.	Consistent. The Project includes development of commercial uses (Delivery Hub and Service Center for Tesla vehicles). Given the urban nature of the Project Site area, Project employees would be able to walk and bike to/from work. In addition, the Project Site's location near robust transit opportunities (including Metro and AVTA bus lines) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. The Project includes development of commercial uses (Delivery Hub and Service Center for Tesla vehicles) on an infill site in an urbanized area of the City that is near several sources of transit, including Metro and AVTA bus line. The Project would also include 28 bicycle parking spaces. The Project Site's proximity to transit and the Project's inclusion of bicycle parking help to reduce dependence on automobile travel and to reduce mobile-source GHG emissions. The Project consists of an electric vehicle Delivery Hub/Service Center, which would help to further reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.

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

Goals and Guiding Principles	Consistency Assessment
transportation technologies and expanding travel choices.	
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	Not Applicable. This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS.	

Local

City of Los Angeles General Plan

The City’s General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element (including chapters pertaining to Land Use and Urban Form and Neighborhood Design), a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 Citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City’s overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the “umbrella document” that provides the direction and vision necessary to bring cohesion to the City’s overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the Chatsworth-Porter Ranch Community Plan (Community Plan) Area, discussed further below.

Project Consistency Analysis

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

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

Objective	Project Consistency
Framework Element: Land Use Chapter	
<p>Goal 3A A physically balanced distribution of land uses that contributes towards and facilitates the</p> <ul style="list-style-type: none"> • City’s long-term fiscal and economic viability, • Revitalization of economically depressed areas, • Conservation of existing residential neighborhoods, • Equitable distribution of public resources, • Conservation of natural resources, • Provision of adequate infrastructure and public services, • Reduction of traffic congestion and improvement of air quality, • Enhancement of recreation and open space opportunities, • Assurance of environmental justice and a healthful living environment, and • Achievement of the vision for a more livable city. 	<p>Consistent. The Project would revitalize the Project Site by converting a vacant/underutilized building into a viable commercial use containing a Delivery Hub and Service Center for Tesla vehicles, which would also provide new jobs to the area.</p> <p>The Project would also include 28 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site’s location near robust transit opportunities (including Metro and AVTA bus lines) would further reduce dependence on automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.</p>
<p>Policy 3.4.2 Encourage new industrial development in areas traditionally planned for such purposes generally in accordance with the Framework Long-Range Land Use Diagram and as specifically shown on the community plans.</p>	<p>Consistent. The Project includes the development of commercial uses (Delivery Hub and Service Center for Tesla vehicles) on a site that is designated for Light Manufacturing uses in the Chatsworth-Porter Ranch Community Plan.</p>
<p>Goal 3J Industrial growth that provides job opportunities for the City’s residents and maintains the City’s fiscal viability.</p>	<p>Consistent. The Project helps achieve this goal by converting a vacant/underutilized “light manufacturing” property into a viable commercial use containing a Delivery Hub and Service Center for Tesla vehicles, which would also provide new jobs to the area.</p>
<p>Objective 3.14 Provide land and supporting services for the retention of existing and attraction of new industries.</p>	<p>Consistent. The Project would provide a Delivery Hub and Service Center for Tesla vehicles, which is permitted by the Project Site zoning (with removal of the [Q] condition) as well as by the Project Site’s Light Manufacturing land use designation.</p>
<p>Policy 3.14.4 Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.</p>	
<p>Source: City of Los Angeles General Plan.</p>	

Chatsworth-Porter Ranch Community Plan

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

Project Consistency Discussion

The Project supports the following Industrial Objective and Policy of the Community Plan:

- To promote economic well-being and public convenience through designating lands for industrial development that can be used without detriment to adjacent uses of other types, and imposing such restrictions on the types and intensities of industrial uses as are necessary to this purpose. (Objective 4, page 2).
- The Plan encourages continued development of research and development type industries which do not generate excessive noise, dust, and fumes and are compatible with the residential character of the north and west San Fernando Valley. (Industrial Standards and Guidelines, page 8).

The Project would be substantially consistent with this objective and policy contained in the Community Plan. The Project would reutilize, improve, and update the existing vacant building for the sale, preparation, distribution, and service of new Tesla electric vehicles. Electric vehicles are notably different than gas powered vehicles as there is no exhaust system, no fuel tanks, no liquid fuel usage, no engine noise, no emissions like hydrocarbon and carbon monoxide that are emitted from an automobile powered by an internal combustion engine. As such, the proposed Tesla Delivery Hub and Service Center would distribute and service the Tesla electric vehicles and would not generate excessive noise, dust and fumes.

Preservation of industrial land remains an important Citywide policy objective. The proposed Vesting Zone Change from [Q]M2-1 and P-1 to M2-1 will retain the Project Site's underlying industrial status, allowing reutilization and modernization of an existing vacant structure for the sale, preparation, delivery and service of electric vehicles. Therefore, the Project would substantially conform with the purpose, intent and provisions of the General Plan, and the Chatsworth-Porter Ranch Community Plan.

Cumulative Impacts

Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. The Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT. The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction, and which includes a mix of office, retail, and residential uses. Like the Project, this related project is subject to the same City development standards and requirements. The Project and the related project are consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers. Therefore, cumulative impacts related to land use and planning would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located in a City-designated Mineral Resource Zone 2 Area (MRZ-2).⁵² Therefore, the Project would have no impact with respect to the loss of availability of a known regionally-important mineral resource, and no impact would occur.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through Downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present,⁵³ and much of the area around

⁵² City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

⁵³ Conservation Element of the City of Los Angeles General Plan, September 16, 2001, Exhibit A.

the Project Site has been developed with structures and is inaccessible for mining extraction.⁵⁴ Furthermore, the Project Site is developed and located in an urbanized area. Redevelopment of the Project Site would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

Cumulative Impacts

As discussed above, the Project would not result in any impacts related to mineral resources. The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Like the Project, the related project is not located in a Mineral Resource Zone. Therefore, no cumulative impacts related to mineral resources would occur.

⁵⁴ Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based on the following, which is included in Appendix E of this IS/MND:

E Noise Technical Modeling, Noah Tanski Environmental Consulting, October 2023.

Existing Conditions

Noise-Sensitive Receptors

The City’s General Plan Noise Element considers residential uses, long-term care facilities, dormitories, motels, hotels, transient lodgings, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature preserves, and parks to be noise-sensitive uses. The Project is located in a neighborhood that consists mainly of commercial and industrial land uses. There is only a one noise-sensitive receptor within approximately 500 feet of the Project Site, “The 24,” which is a multi-family residential building located at 9254 Winnetka Avenue. “The 24” is located approximately 460 feet east of the Project Site where the nearest construction/renovation activities would occur, though it is approximately 150 feet east of the Project Site’s driveway along Winnetka Avenue. Additional residential buildings are currently under construction as part of an expansion of “The 24” residential campus. These future residential buildings would be setback at a similar or greater distance from the Project Site as the existing residential building at 9254 Winnetka Avenue. It is uncertain if these future residential buildings would be completed and occupied prior to construction of the Project, but the following analysis conservatively assumes that they would be completed, occupied, and therefore sensitive

to the Project’s noise impacts. Given their similar setback and orientation from the Project Site, the existing and future residential buildings are analyzed as a single receptor group – collectively, “The 24 Residences.”

Other sensitive receptors that are located farther from the Project would experience reduced impacts. As such, the following analysis generally focuses on The 24 Residences in order to assess the significance of the Project’s potential noise impacts.

A map showing the location of the Project in relation to The 24 Residences is provided in Figure 4-1.

Existing Ambient Noise Conditions

On August 31, 2021, noise measurements were obtained at two locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project Site and The 24 Residences. At both locations, the primary source of noise was vehicular traffic along Winnetka Avenue and Prairie Street. Secondary sources of noise, such as those from surrounding commercial uses and parking lots, was not a significant contributor to noise levels. The measured noise levels are shown in Table XIII-1, below.

**Table XIII-1
Existing Noise Levels**

Noise Measurement Location	Sound Level (dBA L _{eq})
1. Prairie Street, north of Project Site	61.0
2. Winnetka Avenue, near The 24 Residences	60.9
Source: NTEC, 2021.	



Figure 4-1
Noise Receptor Location Map

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.

Construction

On-Site Construction Activities

Construction of the Project would primarily consist of renovations to the existing movie theater building and parking lot. The movie theater building would be converted into showroom, delivery preparation, parts storage, and service areas in support of the delivery hub and service center use. Internal demolition and construction would be required to facilitate this conversion. Improvements to the parking lot would involve reconfiguring curbs, islands, and striping, as well as installing EV chargers. The Project would not involve mass grading activities or the ground-up construction of any new buildings.

Implementation of these improvements would last up to approximately eight months. Noise-generating construction activities would be permitted to occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M., but the Project is anticipated to utilize a five-day work week.

The 24 Residences is located approximately 460 feet from the nearest Project Site area where parking lot improvements would occur, and it is located over 1,000 feet from the existing movie theater building. Therefore, the following analysis focuses on the potential for parking lot improvements to result in substantial noise increases at The 24 Residences. Internal demolition and other renovation activities at the existing movie theater building that is over 1,000 feet from this receptor would have less potential to result in substantial noise increases at The 24 Residences, given the far greater distance involved and the fact that most work would be internal within the building.

The loudest parking lot improvements would be repaving activities, which would require a dump truck feeding asphalt to a paver, as well as a roller to compact the asphalt. As these construction vehicles work across the approximately 11.5-acre parking lot area, their noise levels at The 24 Residences would fluctuate depending on their distances from the receptor. Noise levels would be greater when these construction vehicles operate closer to The 24 Residences and lower when farther away. Notwithstanding this fact, noise impacts associated with repaving activities have been conservatively modeled by assuming that these construction vehicles would spend an entire workday operating at the minimum 460-foot receptor distance, which approximates the shortest distance between construction vehicles and the ground-level of The 24 Residences. This screening analysis utilizing the minimum 460-foot receptor distance maximizes the Project's construction noise projections. In comparison, construction noise projections at The 24

Residences' upper floors would be similar or reduced based on the slightly farther distance that noise would travel – and thus attenuate – when reaching this receptor’s upper floors.

Table XIII-2 shows the estimated noise increase at The 24 Residences that would result from the Project’s repaving activities. As shown, related noise increases would not exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. And as explained earlier, noise increases from other renovation activities would not exceed those due to the Project’s parking lot repaving activities. Therefore, the Project’s construction noise impact at The 24 Residences from parking lot repaving and other activities would be less than significant.

**Table XIII-2
Construction Noise Levels – Parking Lot Repaving**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
The 24 Residences	61.1	60.9	64.0	3.1
Source: NTEC, 2023. Modeling included in Appendix E of this IS/MND.				

Section 112.05 of the LAMC establishes a noise limit of 75 dBA L_{eq} at a distance of 50 feet for powered equipment and hand tools operated within 500 feet of residential zones between the hours of 7:00 A.M. and 10:00 P.M. As the Project is not located within 500 feet of any residential zone, this regulation would not apply to the Project’s construction noise levels.⁵⁵ In any case, the Project’s “worst-case” construction noise levels at The 24 Residences from parking lot repaving would be 61.1 dBA L_{eq} , which is well-below section 112.05’s 75 dBA L_{eq} noise limit.

Off-Site Construction Activities

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. The Project’s maximum truck trip generation would occur during its demolition phase, when it is conservatively estimated that up to 30 haul trips per day (15 inbound and 15 outbound) would assist in removing demolition materials from the Project Site. This level of haul truck activity (approximately four trips per hour, assuming a standard eight-hour workday) would have a minimal effect on roadside ambient noise levels along Prairie Street, Winnetka Avenue, and other truck routes that would be utilized by the Project’s haul trips, much less than the 5 dBA L_{eq} increase threshold of significance. Therefore, the Project’s noise impact from construction trucks would be less than significant.

⁵⁵ The 24 Residences are part of a mixed-use property that is zoned (Q)CM-1-MPR, which is a “commercial manufacturing” zone.

Additionally, it should be noted that Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles.

Operation

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below.

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ensure that noise from mechanical sources does not increase ambient noise levels at neighboring occupied properties (including non-residential properties within 150 feet of the Project Site) by more than 5 dBA. The 24 Residences is not a neighboring occupied property: it is located over 1,000 feet from the existing theater building that would be converted into the proposed showroom, delivery, preparation, parts storage, and service areas – all of which would be internal within the building. Thus, it reasons that the Project's compliance with LAMC Section 112.02, which would prohibit the Project's mechanical systems or equipment from increasing noise levels at neighboring properties located within 150 feet of the Project Site by 5 dBA, would subsequently ensure that any noise increases at the much-farther The 24 Residences are also below 5 dBA. However, given the over 1,000-foot separation between the existing theater building and The 24 Residences, it is unlikely that The 24 Residences would experience any audible mechanical noises from the Project at all.

Parking

The Project is estimated to generate a maximum 188 vehicle trips per hour. FTA equations for the prediction of parking facility noise impacts estimate that a facility with this hourly vehicle activity would result in a noise level of 49 dBA L_{eq} within 50 feet, or approximately 30 dBA L_{eq} at The 24 Residences, which is over 460 feet from the Project's visitor parking areas where most parking activity would occur. Given the fact that daytime noise levels at The 24 Residences exceed 60 dBA L_{eq} , it is unlikely that the Project's parking activity would result in measurable, let alone noticeably louder noise conditions at The 24 Residences. Noise increases over any averaging period (i.e., hourly L_{eq} , 24-hour CNEL, etc.) would be nominal, less than 0.1 dBA.

Car Delivery

Car offloading from delivery trucks would take place south of the existing theater building, over 1,000 feet from The 24 Residences. An idling truck would generate a sound power level of approximately 96 dBA, which would be no greater than approximately 40 dBA at The 24 Residences. Given the fact that daytime noise levels at The 24 Residences exceed 60 dBA L_{eq} , it is unlikely that truck idling noise would result in measurably or noticeably louder noise conditions at this receptor, especially given the fact that deliveries would occur intermittently, and truck idling

would be restricted no more than five minutes, based on State idling rules. Noise increases over any averaging period would be nominal, less than 0.1 dBA.

Automobile Servicing

The Project's service areas would be fully internal within the existing theater building and over 1,000 feet from The 24 Residences. The types of power tools utilized, such as torque wrenches and drills, generally produce noise levels less than 75 dBA at 50 feet. Noise levels at The 24 Residences would be less than 30 dBA based on attenuation from distance and the fully enclosed service areas. This would have a nominal effect on the receptor's daytime noise levels, which exceed 60 dBA L_{eq} . Noise increases over any averaging period would be nominal, less than 0.1 dBA.

Overall, the Project's on-site sources of operational noise would not be capable of individually or collectively increasing ambient noise levels at The 24 Residences by a substantial degree. The Project's noisiest sources (e.g., mechanical sources, car delivery trucks, automobile servicing tools) would operate over 1,000 feet from The 24 Residences such that their noise levels would be substantially attenuated before reaching The 24 Residences. And the Project's nearest source of noise, its parking lot, would not generate substantial noise levels to begin with. Combined noise levels from the Project's on-site noise sources would not increase ambient noise levels at The 24 Residences by more than a fraction of a decibel, an imperceptible increase. As a result, the impact of the Project's on-site operational noise sources would be less than significant.

Off-Site Operational Noise

On a typical weekday, the Project is estimated to generate approximately 1,918 net new vehicle trips, including 185 A.M. peak hour trips and 243 net new P.M. peak hour trips.⁵⁶ As shown in Table XIII-3, the Project's peak-hour traffic would not generate noise levels in excess of 48.4 dBA L_{eq} on Prairie Street or 55.0 dBA L_{eq} on Winnetka Avenue, which are the roadways that would experience the greatest shares of Project-related traffic. These maximum peak-hour impacts are much lower than existing ambient noise levels on Prairie Street and Winnetka Avenue. For example, daytime ambient noise levels along Prairie Street were measured to be 61.0 dBA L_{eq} , which is much greater than the Project's maximum 48.4 dBA L_{eq} traffic noise impact on this roadway. Daytime ambient noise levels along Winnetka Avenue were measured to be 60.9 dBA L_{eq} , also much higher than the Project's maximum 55.0 dBA L_{eq} traffic noise impact on this roadway. Given these results, the Project's overall impact on surrounding traffic noise levels no more than a 1 dBA L_{eq} impact during any operational hour and less than a 1 dBA CNEL impact over the course of any day. Therefore, the Project's traffic-related noise impact would be less than significant.

⁵⁶ Linscott, Law & Greenspan, Engineers. LADOT Transportation Assessment Memorandum of Understanding. August 2023.

**Table XIII-3
Project Only Traffic Noise Levels**

Roadway Segment	Traffic Noise Level (dBA L _{eq})	
	AM Peak Hour	PM Peak Hour
Prairie Street, east of Oso Avenue	47.4	48.4
Winnetka Avenue, north of Prairie Street	52.8	55.0
Winnetka Avenue, south of Prairie Street	49.4	50.3
Source: Modeling by NTEC, 2023. Modeling included in Appendix E of this IS/MND. Traffic data provided by Linscott, Law & Greenspan, Engineers, 2023.		

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

Less Than Significant Impact.

Construction

Construction of the Project may occasionally employ smaller earthmoving vehicles such as skid steer loaders or mini excavators. These vehicles can produce groundborne vibration levels up to 0.003 inches per second peak particle velocity (PPV) at a reference distance of 25 feet. This is well below the FTA’s most stringent vibration damage criteria for “Buildings extremely susceptible to vibration damage,” which is 0.12 inches per second PPV. Because there are no structures within 25 feet of the Project Site, much less structures that are extremely susceptible to vibration damage, the Project’s construction equipment would not be capable of exposing structures to groundborne vibration levels in excess of FTA vibration damage criteria. As a result, the Project’s building damage-related groundborne vibration impacts from construction would be less than significant.

Operation

The Project would not contain any significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Automobile service equipment would primarily be conventional auto-mechanic tools, which do not produce substantial groundborne vibration. The Project’s related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. Therefore, the Project’s operations-related groundborne vibration impact 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 two miles of a public or public use airport and would not expose people residing or working in the project area to excessive noise levels from aircraft. Therefore, no impact would occur.

Cumulative Impacts

Construction

As discussed previously, the Project's construction activities could temporarily increase ambient noise levels at The 24 Residences, which is the only noise-sensitive receptor identified within 500 feet of the Project Site. Any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at this receptor and potentially result in a cumulatively considerable impact. However, the only related project identified in the vicinity of the Project and The 24 Residences is The 24 Residences itself. The 24 Residences, part of the larger "24" mixed-use campus, is currently under construction to add additional residential buildings. The preceding analysis addresses the Project's construction noise impact to this receptor and demonstrates that the impact would be less than significant.

Regarding vibration, the Project would generate negligible construction-related groundborne vibrations at the nearest surrounding structures, far below thresholds associated with building damage. There is no potential for cumulatively considerable vibration impacts at receptors because the presence of multiple vibration sources rarely results in cumulative increases in groundborne vibration levels. Generally, additional vibration sources result in additional vibration peaks (i.e., PPV groundborne vibration signals or events), not necessarily higher (i.e., more damaging) peaks, because the probabilities of constructive wave interference are extremely small. Therefore, this impact would be less than significant.

Operation

As discussed earlier, the Project's on-site operational noise sources would have a minimal effect on surrounding ambient noise levels, particularly at The 24 Residences. The Project's traffic-generation would also result in minimal increases in the area's roadside ambient noise levels. Therefore, the Project's operations would not meaningfully contribute to any cumulatively considerable noise increases, and this impact would be less than significant.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, the Project's indirect unplanned population growth impacts associated with construction activities would be less than significant.

Operation

The proposed uses would generate to 88 employment positions at the Project Site.⁵⁷ Based on the nature of the Project, it is likely that the employees who would work at the Project would already reside in the surrounding area, and it is not anticipated that people would move to the

⁵⁷ As discussed in the Transportation Assessment contained in Appendix F-1 of this IS/MND, based on the City's VMT calculator, the Project would generate 88 employees.

area to work at the Project Site. Further, the employment generated by the Project is consistent with the Project Site's location in or near the Valley Job Center, which the RTP/SCS identifies as being generally north of Roscoe Boulevard and east of Topanga Canyon Boulevard. Thus, employment associated with the Project would not induce substantial unplanned population growth in the City, and this impact would be less than significant.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating the construction of replacement housing elsewhere. The Project Site is currently developed with commercial uses and associated parking. The Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur.

Cumulative Impacts

The only identified related project is a mixed-use project located east of the Project Site, across Winnetka Avenue. This project includes a mix of office, retail, and residential uses, which would help the City meet its goal to provide additional housing units. Further, as discussed previously, the Project would provide employment positions that would likely be accommodated by people who already reside in the surrounding area, and the Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if, as a result of LAFD not being able to adequately serve the Project with existing governmental facilities, there would be a need for a new or physically altered fire station to be constructed which would cause significant environmental impacts.⁵⁸ The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.⁵⁹ The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

⁵⁸ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

⁵⁹ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

Construction

Construction and demolition activities associated with the Project could temporarily increase demand for fire protection. Such activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Project construction activities would comply with all applicable federal, state, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel will have training in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.⁶⁰ Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections) and travel lanes would be maintained in each direction on all public streets around the Project Site throughout the construction period, and emergency access would not be impeded. Further, the Project would be required to implement a Construction Traffic Management Plan, which would include traffic management strategies, and ensure that adequate and safe access for LAFD remains available within and near the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access and response times. However, a Construction Traffic Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. The majority of construction-related traffic, including deliveries, hauling activities, and construction worker trips, would occur outside the typical weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts and the slowing

⁶⁰ Cal. Code of Regs., tit. 8, § 1920.

of emergency response times. In addition, temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period, and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections).

Furthermore, Section 21055 of the California Vehicle Code (CVC) exempts drivers of authorized emergency vehicles from adherence to the rules of the road, and Section 21806 of the CVC requires drivers to yield to emergency vehicles. Finally, construction is a temporary condition which would not itself require the construction of specific new governmental facilities to maintain adequate fire protection services.

The Project is similar to other construction projects, uses standard materials and construction practices similar to such projects, and as a result, LAFD possesses sufficient equipment, knowledge, and resources to address any concerns related to fire protection from the Project. Furthermore, as discussed above, the Project would comply with relevant regulations for workplace safety, best management practices for material use and storage, and ensuring emergency access to the site.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

The Project's proposed uses would be similar to other uses in the Project vicinity. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest to the Project Site. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the 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 commercial/industrial is 1 mile for an engine company and 1.5 miles for a truck company. If this maximum distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. LAFD Station No. 107, located at 20225 Devonshire Street, which is approximately 1.5 miles from the Project Site, would serve the Project Site. Station No. 107 is equipped with a truck company and an engine company. However, as this station is further than 1 mile from the Project Site, automated fire sprinklers would be required.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Winnetka Avenue, Oso Avenue, and Prairie Street) and would be maintained at all times during both Project construction and operation. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Department of Building and Safety and LAFD standards and requirements for design and construction.

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element and Policy 2.1.6 of the Safety Element, and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Further, LAFD has identified future strategies in their 2018-2020 Strategic Plan as critical goals to continue to provide excellent service and meet future needs. These strategies consist of better integration of technology in dispatch, vehicle location systems, and staffing as a key component of LAFD's strategy. LAFD is adapting more advanced technological strategies to deploy resources and address life safety issues, maximizing existing resources. LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements outlined which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project operation would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Implementation of the Project and the related project would result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related project would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related project would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.⁶¹ The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.⁶² The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction and operation of new uses can result in additional calls for service from the Los Angeles Police Department (LAPD). The Project includes proposed construction methods and

⁶¹ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

⁶² City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

building uses currently widespread in the City of Los Angeles, which LAPD has sufficient specialized equipment and training with which to respond. LAPD dispatches resources dynamically, with officers responding from the field, patrols, or facilities depending on their location at the time. Due to the nature of dispatching police calls for service, facilities are not the limiting factor in responding to calls for service, but rather equipment and staffing as police are infrequently in one location for extended periods of time. LAPD continually evaluates their equipment and staff levels, making adjustments as necessary, with a focus towards advanced technology, operational efficiencies, community involvement, and advanced training to maximize current resources community involvement, as outlined in the LAPD Strategic Plan, *LAPD 2020 & Beyond*.⁶³ Due to the unpredictable nature of deploying resources, developments such as advanced equipment in vehicles, improved access to digital resources in vehicles, and advanced mobile phone capabilities all allow for a more mobile and dynamically deployed workforce. These advances, such as in car computers, mobile phone advancements, mapping and navigation improvements, and dispatch center advancements allow for resources to be deployed from the field rather than a static office or station. The Project would not introduce physical obstructions, inhibiting the LAPD, nor would the uses contain novel activities that would require new police facilities to adequately ensure public safety. The Project would also comply with relevant laws, as well as industry standards in securing the property during both construction and operation. The Project would include security measures during operation, such as secured access, closed circuit video surveillance, security alarm systems, and ample lighting. The Project would not constitute a novel arrangement of uses or use type which would require the construction of altered or new specialized facilities.

The Project Site is served by the City of Los Angeles Police Department's (LAPD) Valley Bureau, which oversees LAPD operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley areas.⁶⁴ The Devonshire Community Police Station, located at 10250 Etiwanda Avenue, is approximately 3.8 miles driving distance from the Project Site. The Valley Bureau service area is 226 square miles in size has approximately 1.8 million residents.⁶⁵ LAPD has identified the need for more reserve officers in its Strategic Plan, and identifies staffing needs yearly during the budgeting process. New staffing is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project would not introduce population to an area not served by a police station or an area otherwise not currently served by existing police services, and therefore the Project would not require new facilities or staffing requiring dedicated facilities.

Furthermore, the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services.

⁶³ <http://lapd-assets.lapdonline.org/assets/pdf/Strategic%20Plan%202019-2021.pdf>

⁶⁴ LAPD, Valley Bureau: http://www.lapdonline.org/valley_bureau

⁶⁵ LAPD: http://www.lapdonline.org/west_valley_community_police_station

Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAPD emergency response. In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, Project impacts would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Implementation of the Project and the related project would result in a net increase in the number of residents and employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related project would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related project would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

c. Schools?

Less Than Significant Impact. The Project would reutilize the existing theater building for a new Tesla Delivery Hub and Service Center, which would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. While the Project does not include residential uses and therefore would not result in any direct demand for school services, the related project includes approximately 260 residential units and therefore would result in an

increase in the number students in the Project Site area. However, similar to the applicant of the Project, the applicants of the related project would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d. Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The Project would reutilize the existing theater building for a new Tesla Delivery Hub and Service Center. Employees generated by the proposed use would not typically enjoy long periods of time during the workday to visit parks, and they would be more likely to use parks near their homes during non-work hours. In addition, the demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. The Project includes only commercial uses, which would not generate a residential population that would result in additional demand for parks and recreational facilities, and this impact would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. As the related project includes residential uses, it could result in an increase demand for parks and recreational services. The related project includes amenities such as a pool and fitness center. In addition, as the related project includes residential uses, the applicant of the related project would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

e. Other public facilities?

Less Than Significant Impact. The Project would reutilize the existing theater building for a new Tesla Delivery Hub and Service Center. Employees generated by the proposed use would not typically enjoy long periods of time during the workday to visit libraries, and they would be more likely to use libraries near their homes during non-work hours. In addition, it is likely that employees working in the proposed Tesla Delivery Hub and Service Center would have individual access to internet service, which provides information and research capabilities that studies have

shown to reduce demand at physical library locations.^{66,67} As the Project only includes commercial uses, it would not result in additional demand for library facilities, and this impact would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. As the related project includes residential uses, it could result in an increase demand for library services. The anticipated revenue to the General Fund generated by the related project through business taxes and other revenue sources would help offset the increase in demand for library services and fund necessary library improvements. As such, the demand for library services created by the related project could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

⁶⁶ "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": <http://www.nea.gov/research/toread.pdf>.

⁶⁷ "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As discussed in response to Checklist Question XV(d) (Public Services – Parks), the Project includes only commercial uses, which would not generate a residential population that would result in additional demand for parks and recreational facilities, and therefore, this impact would be less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, the construction of which could have a significant adverse effect on the environment. The Project does not include any recreational facilities. Further, as the Project would not result in additional demand for parks and recreational facilities, the Project would not require the construction or expansion of recreational facilities, and no impact would occur.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question XV(d) (Public Services – Parks). As discussed therein, cumulative impacts related to parks and recreational facilities would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based on the following items, which are included as Appendix F-1 and F-2 of this IS/MND:

F-1 Transportation Assessment, Linscott, Law & Greenspan, Engineers, October 30, 2023.

F-2 Transportation Assessment Letter, Los Angeles Department of Transportation, November 14, 2023.

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. Appendix D of the Transportation Assessment, which is included as Appendix F-1 of this IS/MND, provides an analysis of the Project’s consistency with the City’s relevant plans and policies. As confirmed in Appendix D, the Project would not conflict with the relevant City plans, policies, and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project will not conflict with any plans or policies that govern the public right-of-way, such as the Los Angeles Department of Transportation’s (LADOT) Manual of Policy and Procedures (MPP) Section 321, Driveway Design, and the Citywide Design Guidelines – Guideline 2. The Project has been found to be consistent with the GHG reduction targets forecasted in the SCAG

RTP/SCS. Additionally, the Project has been found to be consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, and the Chatsworth-Porter Ranch Community Plan Community Plan.

Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant. Furthermore, the Project Applicant will comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance in LAMC Section 12.26.J) and other requirements pursuant to the LAMC. It is noted that the City's TDM Ordinance is currently being updated. Although not yet adopted, the Project Applicant will comply with the terms of the proposed TDM Ordinance update, which is expected to be completed prior to the anticipated construction of the Project.

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

Less Than Significant with Mitigation Incorporated. This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The Los Angeles Department of City Planning (LADCP) and LADOT updated the Transportation Section of the City's CEQA Thresholds Guide to comply with and implement Senate Bill 743 (SB 743).

On September 27, 2013, Governor Brown signed SB 743. Under SB 743, the focus of transportation analysis pursuant to CEQA shifts from driver delay, or Level of Service (LOS), to reduction in VMT, reduction in GHG emissions, creation of multimodal networks, and promotion of mixed-use developments. In December 2018, the California Natural Resources Agency certified and adopted amendments to the CEQA Guidelines implementing SB 743 with a target implementation date of July 1, 2020. City staff presented the CEQA Appendix G environmental checklist update to the City Council, which led to the adoption of new VMT-based significance thresholds and its subsequent incorporation into the City's CEQA Threshold Guide. In the course of this update, LADOT has developed a VMT Calculator tool to "screen" projects to determine if a VMT analysis is required, and if so, then to estimate project specific daily household VMT per capita and daily work VMT per employee for land use development projects. This tool is intended to be used for the development projects within the City, and the VMT methodology is tailored to the Transportation Assessment Guidelines (TAG).

For development projects, a proposed project will have a potential VMT impact if a project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission ("APC") area in which the project is located.

- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. As the Project Site is located within the North Valley APC, the VMT impact criteria (i.e., 15% below the APC average) applicable to the Project is 15.0 Daily Work VMT per Employee.

The impact methodology set forth in the TAG for a mixed-use project such as the Project is as follows:

- **Mixed-Use Projects.** The Project VMT impact should be considered significant if any one (or all) of the Project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Project VMT Analysis

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.4 of the City's VMT Calculator tool. Copies of the detailed City of Los Angeles VMT Calculator worksheets for the Project are contained in Appendix B of the Transportation Assessment, which is included as Appendix F-1 of this IS/MND. As indicated in the summary VMT Calculator worksheet, the Project is forecast to generate the following:

- The Project Applicant will commit to implementing one TDM measure as a Project Design Feature: Include Bike Parking per LAMC.
- The Project, with the inclusion of the Project Design Feature (Include Bike Parking per LAMC), is estimated to generate a total of 1,934 daily vehicle trips.
- The estimated Daily Work VMT per Employee for the Project with the inclusion of the Project Design Feature is 17.1 Daily Work VMT per Employee, which is greater than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee. Therefore, the Project would result in a significant Daily Work VMT per Employee impact.
- Mitigation Measures have been identified to reduce the Daily Work VMT per Employee impact to a less than significant level. Therefore, the Project will provide transit subsidies and implement a ride-share program as Mitigation Measures.

- The Project, with the inclusion of the Project Design Feature and Mitigation Measures described above, is estimated to generate a total of 1,918 daily vehicle trips.
- The estimated Daily Work VMT per Employee for the Project with the inclusion of the Project Design Feature and Mitigation Measures is 14.8 Daily Work VMT per Employee, which is less than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee.

Based on the above analyses the Project, with inclusion of the TDM strategies as Project Design Features and Mitigation Measures, would not result in a significant Daily Work VMT per Employee impact. Therefore, no further mitigation is necessary as it relates to VMT.

Mitigation Measures

TRA-1 The Project Applicant shall offer a transit subsidy to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project Applicant shall offer a daily transit subsidy of at least \$0.75 to all employees.

TRA-2 The Project Applicant shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. To be conservative, a Construction Traffic Management Plan (CTMP) will be implemented (see Mitigation Measure TRA-3), which would ensure that impacts are less than significant.

Operation

The Project Site has frontage along Winnetka Avenue, which is designated by the City as a Boulevard II. Additionally, the Project has frontage along Prairie Street and Oso Avenue, both of which are designated by the City as a Local Street – Standard. Winnetka Avenue has a posted speed limit of 40 miles per hour, Prairie Avenue has a posted speed limit of 30 miles per hour, and Oso Avenue has an assumed speed limit of 25 miles per hour.

The Project would maintain the existing vehicular access points and would not add new curb cuts. Additionally, the Project would maintain the existing pedestrian access points to the Project Site, including the direct connection from the sidewalk along the south side of Prairie Street, west of the Westerly Prairie Street Driveway. In addition, the Project would improve the sidewalks along the 22nd Place and 23rd Street property frontages to enhance the pedestrian experience and ensure ADA compliance.

The Bureau of Engineering (BOE) has recommended that the Project provide a one-foot dedication along Prairie Street and Oso Avenue. Additionally, BOE has recommended a 15-foot radius property line return or a 10-foot by 10-foot corner cut dedication at the intersection of Oso Avenue and Prairie Street. Dedication and improvement requirements for the Project will be confirmed with BOE and the Los Angeles Department of City Planning (LADCP) prior to construction. Should it be determined that the dedications are required, the sidewalks along Prairie Street and Oso Avenue would be improved. Additionally, the 15-foot radius property line return or 10-foot by 10-foot corner cut dedication at the intersection of Oso Avenue and Prairie Street would improve conditions for motorists, pedestrians, and bicyclists. Signalized crossings are provided within convenient walking distance to the Project Site along the Winnetka Avenue and Prairie Street corridors.

Winnetka Avenue, Prairie Street, and Oso Avenue are noted in the City's High Injury Network (HIN). However, the Project would not preclude the City from making future safety-related improvements along the roadways fronting the Project Site. Further, no excessive vehicle queuing is anticipated at the Project Site driveways and the driveways would be improved to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site.

Therefore, based on the above, it can be determined that the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and this impact would be less than significant.

Mitigation Measure

TRA-3 Construction Traffic Management Plan

Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts

between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

d. Result in inadequate emergency access?

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times. Emergency vehicular access to the Project Site would be maintained from all Project driveways, and the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and operation. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street

conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant.

Cumulative Impacts

As with the Project, other nearby development projects, such as the one identified related project, will be reviewed for consistency with the local plans, programs, ordinances, and policies that address the circulation system. If a project is found to be inconsistent with any of the local programs, plans, ordinances, and policies that address the circulation system, the project would be required to implement changes or mitigation measures to achieve consistency. Accordingly, there would be no significant cumulative impacts to which the Project, as well as other nearby related projects contribute to regarding transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. In addition, since the Project does not include any features that would preclude the City from complying with these guiding documents and policy objectives, there is no cumulative inconsistency that can be determined. Therefore, cumulative impacts related to plan consistency would be less than significant.

As stated in the City's TAG document (refer to Section 2.2.4 thereof), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS. Based on the above Project-related VMT analysis and conclusions (i.e., which conclude that the Project falls under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), the Project's cumulative VMT impact would be less than significant.

Pursuant to the TAG, the potential for cumulative impacts related to hazardous design features should be determined by reviewing project site access plans for cumulative development projects

with access points proposed along the same block(s) as a proposed project. As stated above, the only identified related project is located east of the Project Site across Winnetka Avenue, and there are no related projects located on the same block as the Project. Therefore, there would be no cumulative impacts related to substantially increasing hazards due to geometric design features or incompatible uses, and this impact would be less than significant.

Finally, similar to the Project, all ingress/egress and access associated with the related project would be designed and constructed in conformance to all applicable requirements, including the City Building Code, City Fire Code, LAMC, and other LAFD standards and requirements for design and construction. As all projects, including the Project and the related project, would be required to comply with existing regulations related to access, cumulative impacts with respect to emergency access would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant with Mitigation Incorporated. A significant impact would occur if the Project would 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, which is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

As discussed above, the existing building on the Project Site is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, the existing building was not identified by

SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review.

Additionally, most of the natural ground-surface appears to be obscured by urban development; consequently, not all surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the Project area, buried resources could potentially be unearthed during Project activities. Therefore, customary caution and a halt-work condition will in place for all ground-disturbing activities. However, as discussed previously, the Project involves the reuse of the existing building and does not involve mass grading activities or the ground-up construction of any new buildings. Nevertheless, in the event that any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations. Excavation of potential cultural resources will not be attempted by Project personnel.

On October 5, 2023, Planning Staff received an email from Sarah Brunzell, on behalf of the Cultural Resources Management (CRM) Division of the Fernandeño Tatviam Band of Mission Indians (FTBMI), requesting that the Applicant submit a FTBMI Project Intake Form, in order to further evaluate the Project's impacts related to Tribal Cultural Resources. On October 13, 2023, the Tribal representative indicated that the Project is categorized as Low Sensitivity and directed the Applicant to complete a new consultation form. On November 15, 2023, the Tribal Representative noted that the Project Site is located in an area that is home to a concentration of Tribal Cultural Resources and thus requested that Mitigation Measures TCR-1, TCR-2, and TCR-3 be included in the Project's Mitigated Negative Declaration Report. If cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting the Secretary of Interior standards retained by the Project Applicant shall assess the find.

Therefore, with implementation of Mitigation Measures TCR-1, TCR-2, and TCR-2, impacts would be less than significant.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant with Mitigation Incorporated. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural

Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. An informational letter was mailed to a total of 10 Tribes known to have resources in this area, on September 22, 2023, describing the Project and requesting any information regarding resources that may exist on or near the Project Site.

On October 5, 2023, Planning Staff received an email from Sarah Brunzell, on behalf of the Cultural Resources Management (CRM) Division of the Fernandeño Tatviam Band of Mission Indians (FTBMI), requesting that the Applicant submit a FTBMI Project Intake Form, in order to further evaluate the Project's impacts related to Tribal Cultural Resources. On October 13, 2023, the Tribal representative indicated that the Project is categorized as Low Sensitivity and directed the Applicant to complete a new consultation form. On November 15, 2023, the Tribal Representative noted that the Project Site is located in an area that is home to a concentration of Tribal Cultural Resources and thus requested that Mitigation Measures TCR-1, TCR, and TCR-3 be included in the Project's Mitigated Negative Declaration Report. If cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot

buffer) shall cease and a qualified archaeologist meeting the Secretary of Interior standards retained by the project applicant shall assess the find.

Should tribal cultural resources be inadvertently encountered, the Project would comply with Mitigation Measures MM-TCR-1 through MM-TCR-3, provided below, regarding the discovery and handling of any potential resources. With implementation of MM-TCR-1 through MM-TCR-3, impacts with respect to tribal cultural resources would be less than significant.

Mitigation Measures

MM-TCR-1: If tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist, defined as someone meeting the Secretary of the Interior Professional Qualification Standards in Archaeology, retained by the Project Applicant shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeano Tataviam Band of Mission Indians (FTBMI) to observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

MM-TCR-2: 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.

MM-TCR-3: 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 pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project would implement Mitigation Measures MM-TCR-1 through MM-TCR-3 to ensure that its impacts with respect to tribal cultural resources are less than significant. The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. The related project would be assessed for the potential to encounter tribal cultural resources, and if necessary, would implement mitigation measures similar to the Project. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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

Water

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 XIX-1, the Project would consume an increase of approximately 9,503 gallons of water per day (gpd). It should be noted that this amount does not take into account the existing uses that would be removed, as well as the effectiveness of water conservation measures required in accordance

with the City’s Green Building Code, which would likely reduce the Project’s water consumption (and wastewater generation) shown on Table XIX-1.

**Table XIX-1
Estimated Wastewater Generation and Water Consumption¹**

Land Use	Size	Water Consumption Rate/Wastewater Generation Rate²	Total (gallons/day)
Delivery Hub/Service Center	118,784 sf	80 gpd/1,000 sf	9,503
Total			9,503
sf = square feet gpd = gallons per day ¹ Conservatively assumes that all water converts to wastewater. ² Source: City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Engineering Services Division, Sewer Generation Factors, April 6, 2012.			

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the LADWP Water Service Organization (WSO) to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project’s demand for water. LADWP’s WSO will initiate a Service Advisory Request (SAR), which when completed, will provide information regarding the range of flows and pressures that can be expected at the requested service location. The type and cost of improvements are also provided in the SAR. A project developer will then be required to participate in the cost of any necessary new water main extensions and/or replacements required to serve a project. In the event LADWP is unable to perform required installations and replacements in a timely manner, the project developer can have the work performed by a private contractor, in consultation with LADWP. Water main and related infrastructure upgrades would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within public and private rights-of-way; and (3) the existing infrastructure would be replaced with new infrastructure in areas that have already been significantly disturbed. For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Implementation of the Project in conjunction with the related project could result in an increased impact on water conveyance infrastructure. It should be noted that the estimated water demand calculated above for the Project does not take into account the effectiveness of water conservation measures required in accordance with the City’s Green Building Code, nor does it take into account the water demand from the existing uses, all of which would likely substantially reduce the cumulative water consumption. As with the Project, the related project would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for

each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirements for fire flow and other fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. As identified on Table XIX-1, above, the Project would generate an increase of approximately 9,503 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.

Regarding sewer capacity, the City has a codified regulatory process to confirm that there is sufficient infrastructure capacity to serve a project. The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

If the public sewer lacks sufficient capacity, the Project would be required to build sewer lines to a point in the sewer system with sufficient capacity. Potential sewer infrastructure upgrades would not be expected to create a significant impact to the physical environment as installation of any upgrades would primarily involve trenching within the affected streets and within areas that have already been significantly disturbed. The Project would secure any necessary permits from the Department of Public Works and would comply with all standard City requirements during construction, as described above. Therefore, Project impacts related to the construction or relocation of new facilities associated with wastewater infrastructure would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Implementation of the Project combined with the related project in the area could increase the need for wastewater treatment. As with the Project, the related project would be subject to review by the Bureau of Sanitation to ensure that existing infrastructure would be adequate to meet the requirements for each project. All development in the City is subject to City requirements regarding potential infrastructure improvements need to meet respective wastewater infrastructure needs. Further, with a remaining treatment capacity of approximately 88 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development, and no new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage

As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electrical Power

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

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Natural Gas

As discussed in response to Checklist Question VI(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Telecommunications

In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

Like the Project, the related project represents infill development served by existing utilities, including telecommunications infrastructure. As with the Project, the related project would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related project would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. As concluded in LADWP's 2020 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an average year, single dry year, and multiple dry year in each year from 2025 to 2045. LADWP's 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021.⁶⁸

⁶⁸ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, page 11-13.

As shown on Table XIX-1, above, the Project would consume a net increase of approximately 9,503 gallons of water per day. According to LADWP, if a project is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted UWMP, which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated. As discussed previously in response to Checklist Question XI(b) (Land Use and Planning), the Project is consistent with the City's General Plan land use designation for the Project Site. As discussed in previously in response to Checklist Question III(a) (Air Quality), the Project would be within the population projections contained in SCAG's RTP/SCS, upon which the current UWMP was based. Thus, the Project's demand for water could be accommodated by LADWP's existing and projected water supplies. As such, the Project would not require new or additional water supply or entitlements, and impacts related to water supply would be less than significant.

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. Implementation of the Project in conjunction with the related project would increase demand for water services provided by the City's water supply system. LADWP (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2040. In terms of the City's overall water supply condition, any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands. For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, the related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Both the Project and the related project would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, 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.

Cumulative Impacts

For a full discussion of cumulative impacts with respect to wastewater treatment, please see subsection (a), above. As discussed therein, cumulative impacts related to wastewater treatment would be less than significant.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals. The landfills that serve the City and the capacity of these landfills are shown in Table XIX-2, below. As shown, the landfills have an approximate available daily intake of 13,886 tons.

**Table XIX-2
Landfill Capacity**

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	2019 Average Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	13	10.18	3,600	2,785	815
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Lancaster	81	9.89	3,000	395	2,605
Sunshine Canyon	17	54.01	12,100	7,420	4,580
Total					13,886
Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021					

Construction

The Project proposes to reuse of the existing building. Therefore, there would be minimal waste generated during the construction period, mostly from interior demolition and construction work. Pursuant to the requirements of Senate Bill 1374⁶⁹, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Given the remaining permitted capacity of the landfills open to the City, the landfills

⁶⁹ <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>

serving the Project Site would have sufficient capacity to accommodate the Project’s construction solid waste disposal needs.

Operation

As shown on Table XIX-2, the Project would generate approximately 593.9 pounds (0.297 tons) of solid waste per day. This total is conservative and does not account for removal of the existing uses, as well as the effectiveness of recycling efforts, which the Project would be required by the City to implement. These regulations include AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City’s Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide, with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁷⁰

With a remaining daily intake capacity of approximately 13,886 tons of solid waste per day, the four Class III landfills serving the City that accept commercial solid waste could accommodate the Project’s increase of approximately 0.297 tons of solid waste per day. Further, 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. Therefore, Project impacts related to solid waste would be less than significant.

**Table XIX-3
Estimated Solid Waste Generation**

Land Use	Size	Generation Rate¹	Total (lbs)
Delivery Hub/Service Center	118,784 sf	5 lbs/day/1,000 sf	593.9
Total			593.9
lbs = pounds sf = square feet			
¹ Source: CalRecycle website: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates .			
Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.			

Cumulative Impacts

The only identified related project is the mixed-use project located east of the Project Site, across Winnetka Avenue, which is currently under construction. The Project in combination with the related project would generate additional solid waste. As shown in Table XIX-2, above, the landfills serving the City have an approximate available daily intake of 13,886 tons. Therefore, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. Similar to the Project, the related project would be required by the City to participate in regional source reduction and recycling programs pursuant to AB 939, which would further reduce the amount of solid waste to be disposed of at the landfills.

⁷⁰ LA Sanitation, Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-zswirp?_adf.ctrl-state=1bepuilnjy_5&_afLoop=15197272541934425#!, accessed October 25, 2023.

Thus, cumulative development would not create the need for new or expanded landfills, and cumulative impacts with respect to solid waste service would be less than significant.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its “Zero-Waste-to-Landfill” goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur.

Cumulative Impacts

All development in the City, including the Project and the related project, would be required to comply with the City’s recycling programs. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.⁷¹ Therefore, no impact would occur.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.⁷² In addition, the Project Site is flat and is not located in a hillside zone. Therefore, no impact would occur.

⁷¹ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 20, 2023.

⁷² City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 20, 2023.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.⁷³ Therefore, no impact would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.⁷⁴ Therefore, no impact would occur.

Cumulative Impacts

The Project vicinity, including the Project Site and the site of the related project, is not within or near a very high fire severity zone, and the Project would not result in any impacts related to wildfire. Therefore, no cumulative impacts related to wildfire would occur.

⁷³ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 20, 2023.

⁷⁴ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 20, 2023.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. As discussed under Checklist Topics IV (Biological Resources) and V (Cultural Resources), the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As discussed under Checklist Topic XVIII (Tribal Cultural Resources), most of the natural ground-surface appears to be obscured by urban development; consequently, not all surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the Project area, buried resources could potentially be unearthed during Project activities. Therefore, customary caution and a halt-work

condition will in place for all ground-disturbing activities. However, as discussed previously, the Project involves the reuse of the existing building and does not involve mass grading activities or the ground-up construction of any new buildings. Nevertheless, in the event that any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations. Excavation of potential cultural resources will not be attempted by Project personnel. Additionally, per the CRM Division's request on November 15, 2023, MM-TCR-1 through MM-TCR-3 will be implemented.

The key elements of the Mitigation Monitoring Program (MMP) for the Project include those presented below:

- The description of the mitigation measure;
- The phases of the Project at which each mitigation measure must be implemented;
- The party who is responsible for the necessary implementing actions;
- The necessary implementing vehicle;
- The party who is responsible for verifying that the necessary implementing action is taken; and
- The primary record documenting the necessary implementing action.

The MMP for the Project is included in Section 5 of this IS/MND. Therefore, with the MMP implemented, impacts would be less than significant with mitigation incorporated and these issues do not need to be further analyzed in an EIR.

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. Based on the analysis contained in this IS/MND, the Project's contribution to cumulative impacts would not be considerable.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Based on the analysis contained in this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings, and all Project impacts would be less than significant.

5 MITIGATION MONITORING PROGRAM

5.1 INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions that are required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Project and therefore, is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, the MND identified mitigation measures to avoid or reduce potentially significant environmental impacts of the Project. This MMP is designed to monitor the implementation of the mitigation measures identified for the Project.

5.2 ORGANIZATION

As shown on the pages below, each identified mitigation measure and/or Project Design Feature (PDF) for the Project is listed and categorized by environmental issue area, with accompanying discussion of the following:

Enforcement Agency – the agency with the power to enforce the mitigation measure and/or PDF.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation, and development are made, or who physically monitors the Project for compliance with the mitigation measure and/or PDF.

Monitoring Phase – the phase of the Project during which the mitigation measure and/or PDF shall be monitored. Examples include the following general categories:

- Pre-Construction, including the design phase

- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the mitigation measure and/or PDF shall be monitored.

Action Indicating Compliance – the action of which the enforcement or monitoring agency indicates that compliance with the required mitigation measure and/or PDF has been implemented.

The Project Applicant shall be responsible for implementing all mitigation measures and/or PDFs unless otherwise noted and shall be obligated to provide documentation concerning the implementation of the listed mitigation measures and/or PDFs to the appropriate monitoring agency and the appropriate enforcement agency. All departments listed in the MMP are within the City unless otherwise noted. It is noted that while certain agencies outside of the City may be listed as the monitoring/enforcement agencies for individual mitigation measures and/or PDFs listed in this MMP, the City, as the Lead Agency for the Project, is responsible for overseeing and enforcing implementation of the MMP as a whole.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Project Applicant shall be responsible for implementing each mitigation measure and/or PDF and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each mitigation measure and/or PDF has been implemented. The Project Applicant shall maintain records demonstrating compliance with each mitigation measure and/or PDF. Such records shall be made available to the City upon request.

5.4 PROGRAM MODIFICATION

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

The Project shall be in substantial conformance with the mitigation measures and/or PDFs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with the mitigation measures and/or PDFs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a mitigation measure and/or

PDF may be modified or deleted, if the enforcing department or agency or the decision maker for a subsequent discretionary Project-related approval finds that the modification or deletion complies with CEQA, including State CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modification to or deletion of mitigation measures and/or PDFs. Any addendum or subsequent CEQA clearance that may be required in connection with the modification or deletion shall explain why the mitigation measure and/or PDF is no longer needed, not feasible, or the other basis for modifying or deleting the mitigation measure and/or PDF. Under this process, the modification or deletion of a mitigation measure and/or PDF shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures and/or PDFs results in a substantial change to the Project or the non-environmental conditions of approval.

5.5 MMP

5.5.1 MITIGATION MEASURES

TRANSPORTATION

TRA-1 The Project Applicant shall offer a transit subsidy to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project Applicant shall offer a daily transit subsidy of at least \$0.75 to all employees.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Field inspection once per year for five years

Action Indicating Compliance: Field inspection sign-off

TRA-2 The Project Applicant shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

TRA-3 Construction Traffic Management Plan

Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; periodic field inspection

Action Indicating Compliance: Plan approval; field inspection sign-off

TRIBAL CULTURAL RESOURCES

TCR-1 If tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist, defined as someone meeting the Secretary of the Interior Professional Qualification Standards in Archaeology, retained by the Project Applicant shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeano Tataviam Band of Mission Indians (FTBMI) to observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

TCR-2 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: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection if tribal cultural resources are encountered

Action Indicating Compliance: Field inspection sign-off

TCR-3 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 pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection if human remains or funerary objects are encountered

Action Indicating Compliance: Field inspection sign-off

5.5.2 PROJECT DESIGN FEATURES

PDF-1 The Project will include solar panels on 15 percent of the roof area.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval

PDF-2 Where available, the Project will use power poles to provide electricity during construction.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off