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

Mitigated Negative Declaration

20401 VENTURA BOULEVARD PROJECT

Case Number: ENV-2022-8821-MND

Project Location: 20401 Ventura Boulevard, Los Angeles, CA 91364

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

Council District: 3-Bob Blumenfield

Project Description: The Project includes the demolition and removal of the existing remnant building foundation and associated parking areas from the Project Site for the construction, use, and maintenance of a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, and associated parking lot.[1] The building would be three (3) stories tall (a maximum building height of 38 feet 3 1/8 inches) over two (2) basement levels of storage space. The Project would include 22 vehicle parking spaces to be provided in a surface parking lot located in the eastern portion of the Project Site. Additionally, the Project would include 16 short-term bicycle parking spaces and 24 long-term bicycle parking spaces. A loading area would be located interior of the building, with additional loading areas located within the surface parking lot in the northeastern portion of the Project Site. Project signage would include four (4) Wall Signs and one (1) Monument Sign. The 19 non-protected but significant trees on the Project Site would be removed and replaced in accordance with the City's tree replacement requirements. The Project would require the export of approximately 32,598 cubic yards of material during the demolition phase and 41,000 cubic yards of soil and material during the grading phase. The Applicant is seeking the following discretionary approvals from the City: 1) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32(Q), a Vesting Zone Change from P-1LD, C2-1LD, and C4-1LD to C2-2LD; 2) Pursuant to LAMC Section 12.24.W.50, a Conditional Use to allow for the development of a storage building for household goods within 500 feet of a residential use; 3) Pursuant to LAMC Section 11.5.7.F, Specific Plan Exceptions from the Ventura Cahuenga Boulevard Corridor Specific Plan for: a) an increase in height from 30 feet to 37 feet 7½ inches; b) an increase in floor area ratio (FAR) from 1:1 to 2.96:1; and c) relief from the stepback requirement of the specific plan Section 7.E.1.f; 4) Pursuant to LAMC Section 11.5.7.C, a Specific Plan Project Compliance Review and a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required; and 5) Pursuant to LAMC Section 16.05, Site Plan Review for a development of a project resulting in a net increase of 50,000 square feet of nonresidential floor area.

PREPARED FOR:	PREPARED BY:	APPLICANT:
The City of Los Angeles Department of City Planning	CAJA Environmental Services 9410 Topanga Cnyn. Blvd. Chatsworth, CA 91311	20401 Ventura Boulevard, LLC 570 Lake Cook Road, Suite 325 Deerfield, IL 60015

[1] *The gross square footage of the proposed building is 158,317 square feet, and the net square footage is 146,012 square feet.*

November 2023

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from the construction and operation of the proposed 20401 W. Ventura Boulevard Project (Project). The Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project would not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration (IS/MND) is intended as informational documents and is ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes: (1) to inform governmental decision-makers and the public about the potentially 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 mitigation measures or feasible alternatives[1]; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An application for the Project has been submitted to the Department of City Planning for discretionary review. The Department of City Planning, as the Lead Agency, has determined that the Project is subject to CEQA, and the preparation of an IS/MND is required.

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

This IS/MND has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1 *Project Alternatives are only required in an EIR.*

1.2. ORGANIZATION OF THE IS/MND

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

1 INTRODUCTION

Describes the purpose and content of the Initial Study, and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics 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

The Mitigation Monitoring Program (MMP) is the document that will be used by the enforcement and monitoring agencies responsible for the implementation of the mitigation measures that have been incorporated into the Project. The mitigation measures that have been incorporated into the Project are listed by environmental topic.

6 PREPARERS AND PERSONS CONSULTED

Identifies the Lead Agency, the Project Applicant, and consultants/persons associated with preparation of the Initial Study.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	20401 WEST VENTURA BOULEVARD “PROJECT”
ENVIRONMENTAL CASE NO.	ENV-2022-8821-MND
RELATED CASES	CPC-2022-8820-VZC-CU-SPE-SPP-SPR

PROJECT LOCATION	20401 WEST VENTURA BOULEVARD, LOS ANGELES, CA 91364
COMMUNITY PLAN AREA	CANOGA PARK – WINNETKA - WOODLAND HILLS - WEST HILLS
GENERAL PLAN DESIGNATION	GENERAL COMMERCIAL
ZONING	C2-1LD, C4-1LD, P-1LD
COUNCIL DISTRICT	CD 3, COUNCILMEMEBER, BOB BLUMENFIELD

LEAD AGENCY	CITY OF LOS ANGELES
STAFF CONTACT	ADRINEH MELKONIAN
ADDRESS	6262 VAN NUYS BOULEVARD, ROOM 430 VAN NUYS, CA 91401
PHONE NUMBER	(213) 978-1301
EMAIL	ADRINEH.MELKONIAN@LACITY.ORG

APPLICANT	20401 VENTURA BOULEVARD, LLC
ADDRESS	570 LAKE COOK ROAD, SUITE 325, DEERFIELD, IL 60015
PHONE NUMBER	(310) 683-0964

PROJECT SUMMARY

The Project includes the demolition and removal of the existing remnant building foundation and associated parking areas from the Project Site for the construction, use, and maintenance of a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, and associated parking lot.[1] The building would be three stories tall (a maximum building height of 38 feet 3 1/8 inches) over two (2) basement levels of storage space. The Project would include 22 vehicle parking spaces to be provided in a surface parking lot located in the eastern portion of the Project Site. Additionally, the Project would include 16 short-term bicycle parking spaces and 24 long-term bicycle parking spaces. A loading area would be located interior of the building, with additional loading areas located within the surface parking lot in the northeastern portion of the Project Site. Project signage would include (4) Wall Signs and one (1) Monument Sign. The 19 non-protected but significant trees on the Project Site would be removed and replaced in accordance with the City's tree replacement requirements. The Project would require the export of approximately 32,598 cubic yards of material during the demolition phase and 41,000 cubic yards of soil and material during the grading phase. The Applicant is seeking the following discretionary approvals from the City: 1) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32(Q), a Vesting Zone Change from P-1LD, C2-1LD, and C4-1LD to C2-2LD; 2) Pursuant to LAMC Section 12.24.W.50, a Conditional Use to allow for the development of a storage building for household goods within 500 feet of a residential use; 3) Pursuant to LAMC Section 11.5.7.F, Specific Plan Exceptions from the Ventura Cahuenga Boulevard Corridor Specific Plan for: a) an increase in height from 30 feet to 38 feet 3 1/8 inches; b) an increase in floor area ratio (FAR) from 1:1 to 2.96:1; and c) relief from the stepback requirement of the specific plan Section 7.E.1.f; 4) Pursuant to LAMC Section 11.5.7.C, a Specific Plan Project Compliance Review and a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required; and 5) Pursuant to LAMC Section 16.05, Site Plan Review for a development of a project resulting in a net increase of 50,000 square feet of nonresidential floor area.

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

ENVIRONMENTAL SETTING

The Project Site is located at 20401 West Ventura Boulevard and comprises assessor's parcel number (APN) 2166-033-012. The Project Site is bounded by Ventura Boulevard to the south, surface parking lots to the east and west, and a right of way associated with the Ventura Freeway to the north. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. The Project Site is located along a corridor of Ventura Boulevard, which is developed mostly with commercial land uses (e.g., retail, restaurant, office, hotel, etc.), but also contains some residential properties. Temple Kol Tikvah is located across Ventura Boulevard to the south from the Project Site. Taft Charter High School is located approximately 0.4 miles to the southeast of the Project Site. Residential land uses lie beyond the commercial development on the south side of Ventura Boulevard. The Ventura Freeway is located just north of the Project Site. The Project Site is zoned

[1] *The gross square footage of the proposed building is 158,317 square feet, and the net square footage is 146,012 square feet.*

C4-1LD (Commercial Zone, Height District 1L, Development Limitation), C2-1LD (Commercial Zone, Height District 1L, Development Limitations), P-1LD (Automobile Parking Zone, Height District 1L, Development Limitations), with a land use designation of General Commercial. The Project Site also falls within the boundaries of the Ventura-Cahuenga Boulevard Corridor Specific Plan, which designates the Project Site as Neighborhood and General Commercial.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED
(e.g., permits, financing approval, or participation agreement)

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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.

Adrineh Melkonian	City Planner
PRINTED NAME	**TITLE**
Adrineh Melkonian	November 22, 2023
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

MITIGATION MEASURES IDENTIFIED FOR THIS PROJECT

CULTURAL RESOURCES

ARCHEO-1: Inadvertent Discovery of Archaeological Resources

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

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

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

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

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

GEOLOGY AND SOILS

PALEO-1 If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

TRIBAL CULTURAL RESOURCES

TCR-1: Prior to the start of construction, a Qualified representative, procured by the Fernandeño Tataviam Band of Mission Indians and retained by the Project Applicant, shall conduct a Tribal Cultural Resources Worker Environmental

Awareness Program (WEAP) training for construction personnel regarding the aspects of Tribal Cultural Resources and the procedures for notifying the Fernandeño Tataviam Band of Mission Indians should Tribal Cultural Resources be discovered by construction staff. Training can be done in conjunction with Cultural Resources WEAP training, if such training is requested by the project's archaeologist.

TCR-2: A Treatment and Disposition Plan (TDP) shall be established, in consultation with the Fernandeño Tataviam Band of Mission Indians, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The TDP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. 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.

TCR-3: 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 Secretary of Interior standards retained by the project applicant shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment. The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground-disturbing activities.

TCR-4: 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 MLD, as determined by the NAHC, should those findings be determined as Native American in origin.

TCR-5: The Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe the first (5) days of scheduled activities which include clearing, grubbing, and grading operations. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by project applicant, in writing, upon completion of each set of scheduled activities and 5 days' notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request ground-disturbing activities cease within 60 feet of the discovery to assess and document potential finds in real time. A qualified archaeologist meeting Secretary

of Interior standards shall also assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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-6: The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to spot check all ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity once weekly for the total duration of such soil disturbing activities. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by project applicant, in writing, upon completion of each set of scheduled activities and 5 days' notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards, retained by the project applicant, as well as the Tribal Monitor, shall assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project includes the demolition and removal of the existing remnant building foundation and associated parking areas from the Project Site for the construction, use, and maintenance of a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, and associated parking lot.[1] The building would be three stories tall (a maximum building height of 38 feet 3 1/8 inches) over two (2) basement levels of storage space. The Project would include 22 vehicle parking spaces to be provided in a surface parking lot located in the eastern portion of the Project Site. Additionally, the Project would include 16 short-term bicycle parking spaces and 24 long-term bicycle parking spaces. A loading area would be located interior of the building, with additional loading areas located within the surface parking lot in the northeastern portion of the Project Site. Project signage would include (4) Wall Signs and one (1) Monument Sign. The 19 non-protected but significant trees on the Project Site would be removed and replaced in accordance with the City's tree replacement requirements. The Project would require the export of approximately 32,598 cubic yards of material during the demolition phase and 41,000 cubic yards of soil and material during the grading phase. The Applicant is seeking the following discretionary approvals from the City: 1) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32(Q), a Vesting Zone Change from P-1LD, C2-1LD, and C4-1LD to C2-2LD; 2) Pursuant to LAMC Section 12.24.W.50, a Conditional Use to allow for the development of a storage building for household goods within 500 feet of a residential use; 3) Pursuant to LAMC Section 11.5.7.F, Specific Plan Exceptions from the Ventura Cahuenga Boulevard Corridor Specific Plan for: a) an increase in height from 30 feet to 38 feet 3 1/8 inches; b) an increase in floor area ratio (FAR) from 1:1 to 2.96:1; and c) relief from the stepback requirement of the specific plan Section 7.E.1.f; 4) Pursuant to LAMC Section 11.5.7.C, a Specific Plan Project Compliance Review and a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required; and 5) Pursuant to LAMC Section 16.05, Site Plan Review for a development of a project resulting in a net increase of 50,000 square feet of nonresidential floor area.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The 1.23-acre (53,529-square-foot) Project Site is located in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area of the City of Los Angeles (City). The

[1] *The gross square footage of the proposed building is 158,317 square feet, and the net square footage is 146,012 square feet.*

Project Site is located at 20401 West Ventura Boulevard and comprises assessor parcel number (APN) 2166-033-012. The Project Site is bounded by Ventura Boulevard to the south, surface parking lots to the east and west, and a right of way associated with the U.S. Highway 101 (Ventura Freeway) to the north. Regional access to the Project Site is provided via Ventura Freeway. The Project Site location is shown in Figures 3-1 and 3-2.

3.2.2 Existing Conditions

The Project Site is zoned C4-1LD (Commercial Zone, Height District 1L, Development Limitation), C2-1LD (Commercial Zone, Height District 1L, Development Limitations), P-1LD (Automobile Parking Zone, Height District 1L, Development Limitations), with a land use designation of General Commercial. The existing zoning and land use designation for the Project Site are shown in Figures 3-3 and 3-4, respectively. The Project Site also falls within the boundaries of the Ventura-Cahuenga Boulevard Corridor Specific Plan, which designates the Project Site as Neighborhood and General Commercial. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. There are 19 trees on the Project Site, four (4) trees located offsite in the Caltrans right-of-way (ROW) north of the Project Site, and four (4) street trees located in the ROW south of the Project Site (refer to Table 3-1).[2,3] None of these are considered a Protected tree as defined by the City.[4] However, all of the trees are considered significant since they all have a minimum trunk size of eight inches in diameter at breast height.

3.2.3 Surrounding Land Uses

Hilly topography and improved streets characterize the area near the Project Site. The Project Site is located on Ventura Boulevard that is developed mostly with commercial land uses (e.g., retail, restaurant, office, hotel, etc.), and also residential properties.

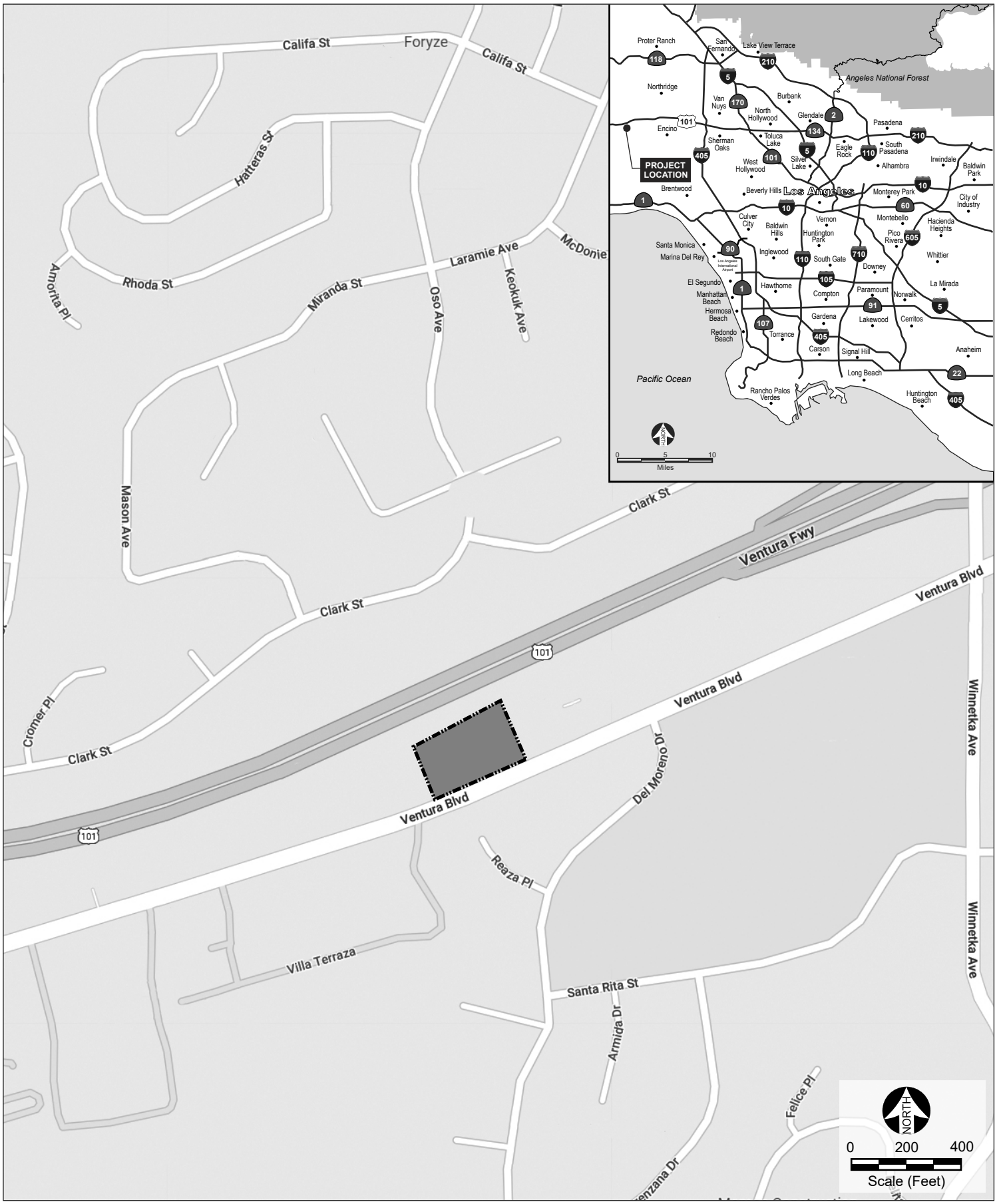
The properties located directly east of the Project Site are zoned (Q)P-1LD and (Q)C4-1LD and are improved with parking lots and an office building. Further east of these properties are two (2) hotels a medical office and a drive-through fast-food restaurant in the C2-1LD and C4-1LD zones. A grocery store (Ralph's) is located on the southeast corner of Winnetka Avenue and Ventura Boulevard, approximately 0.5 miles from the Project Site. Directly west of the Project Site is zoned P-1LD and improved with a parking lot. Further west of the project site is a senior living facility and an office building. Further west of that is a first-aid training facility, a new car dealership, a large retailer (Target), and a shopping center.

---

2 *City of Los Angeles Tree Report, Carlberg Associates, June 11, 2022. Refer to Appendix A.*

3 *One of the street trees is dead.*

4 *Protected trees and shrubs as defined by the City include oak trees (Quercus spp.) and Southern California black walnut trees (Juglans californica), western sycamore trees (Platanus racemosa), California bay trees (Umbellularia californica), Mexican elderberry shrubs (Sambucus Mexicana), and toyon (Heteromeles arbutifolia).*



Legend

Project Site

Source: Google Maps 2023.

Figure 3-1
Regional Location Map

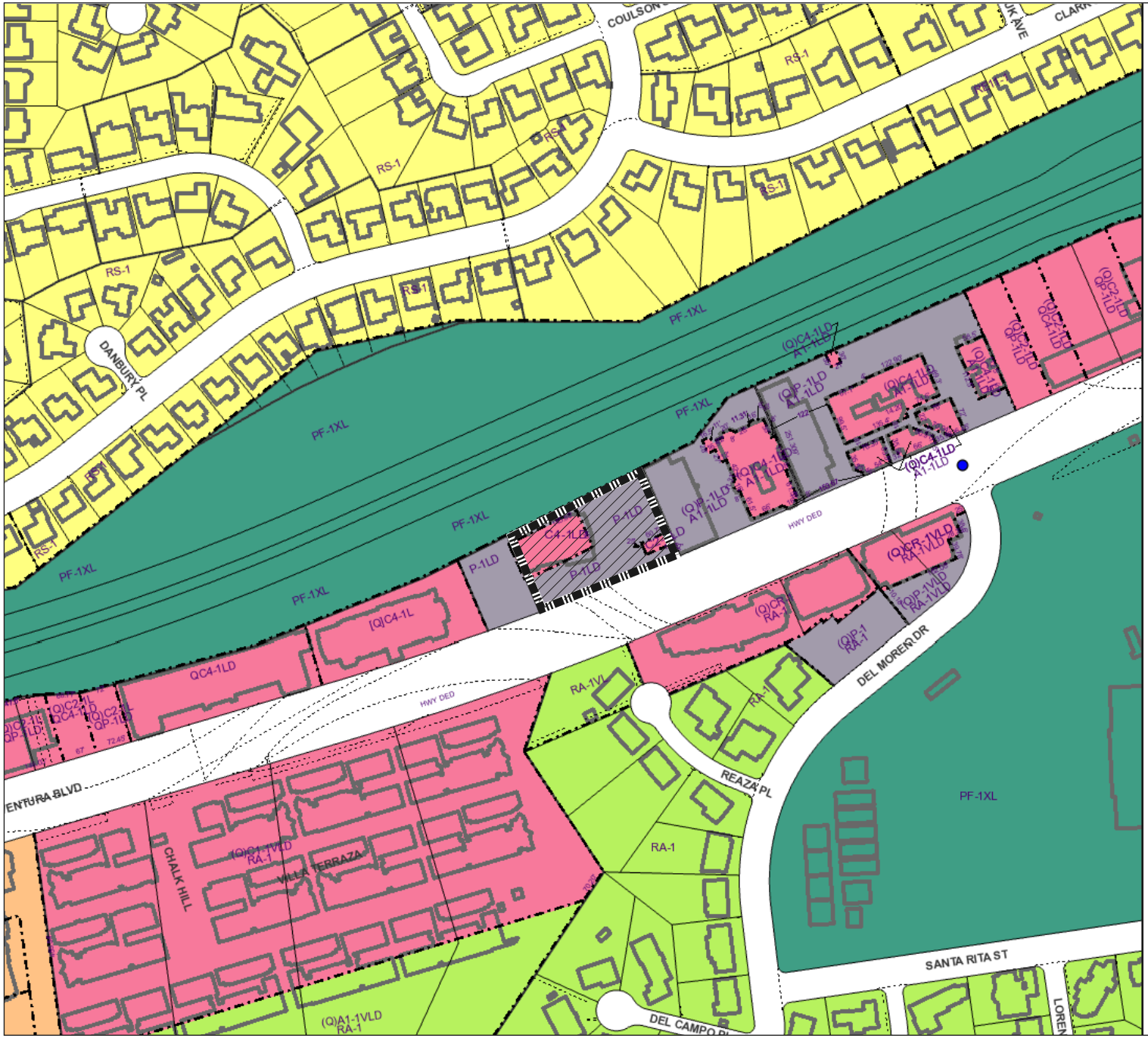


Legend

Project Site

Figure 3-2
Aerial Photo of the Project Site

Source: Google Maps, 2023.



Legend

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF
- HILLSIDE
- Project Site

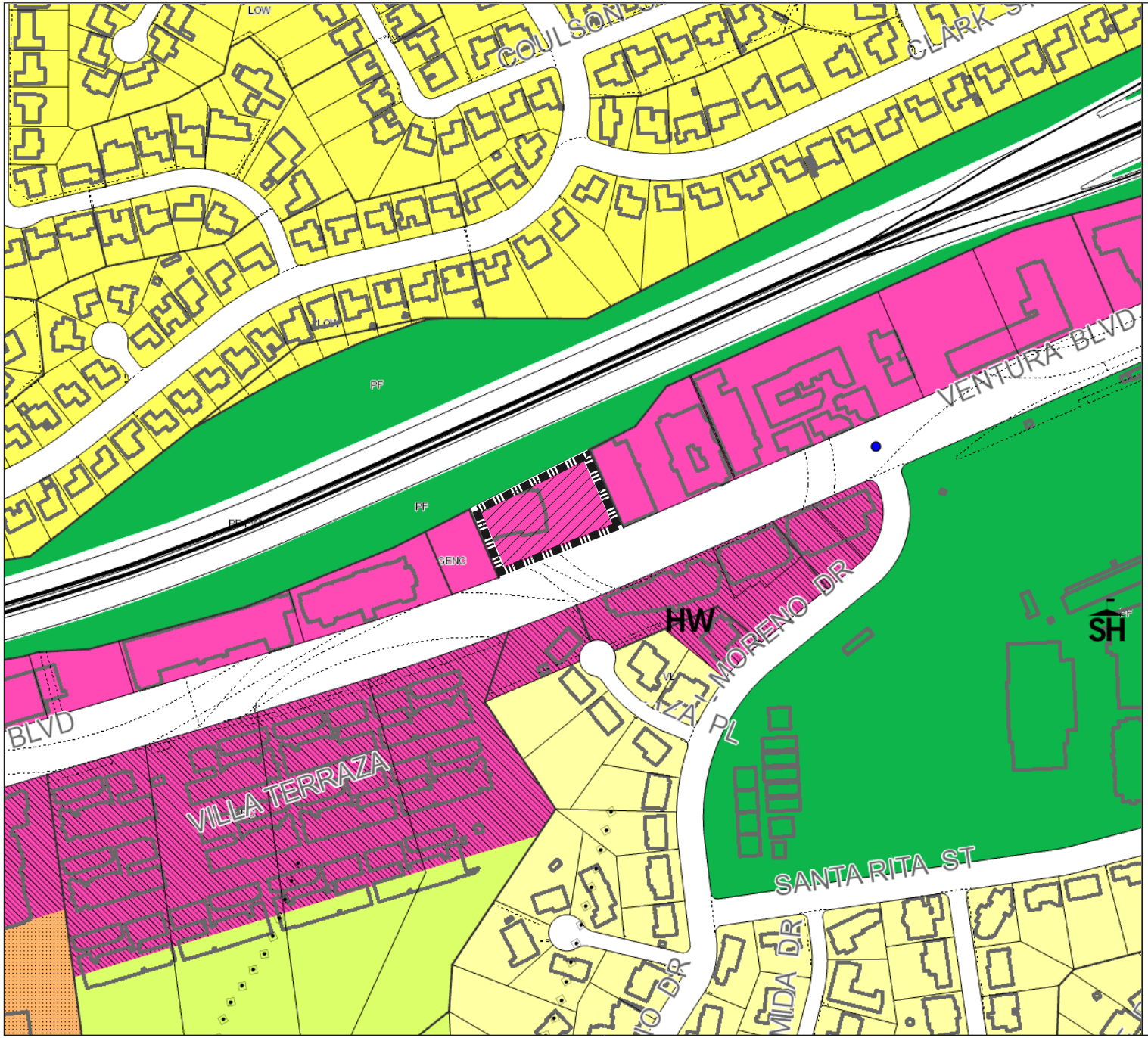
NORTH

0 200

Scale (Feet)

Source: ZIMAS, 2023.

Figure 3-3
Existing Zoning



Legend

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities
- HW House of Worship
- SH Public Senior High School

Project Site

NORTH

0 200

Scale (Feet)

Figure 3-4
Existing Land Use Designation

Source: Los Angeles City Planning Department: http://zimas.lacity.org/, accessed 8/3/2023.

Table 3-1
Project Site Trees and ROW Trees

Tree Species		Quantity/Location
Scientific Name	**Common Name**	
Pinus halepensies	Aleppo pine	2 onsite 1 offsite
Eucalyptus polyanthemos	silver dollar gum	3 offsite
Pinus canariensis	Canary Island pine	2 onsite
Pyrus kawakamii	evergreen pear	2 onsite
Lingustrum lucidum	glossy privet	2 onsite
Juniperus chinesis 'Torulosa'	Hollywood juniper	1 onsite
Washingtonia robusta	Mexican fan palm	6 onsite
Fraxinus uhdel	Shamel ash	4 onsite
Liquidambar styraciflua	American sweetgum	4 ROW[1]
	Total	**19 onsite** **4 offsite** **4 ROW[1]**

ROW = right-of-way

[1] *One of the ROW trees is dead.*

Source: City of Los Angeles Tree Report, Carlberg Associates, June 11, 2022. Refer to Appendix A.

Temple Kol Tikvah is located across Ventura Boulevard to the south of the Project Site and is zoned (Q)CR-1 and (Q)P-1, a single-family home zoned RA-1VL, and a multi-lot multi-family residential development zoned (Q)A1-1VLD and (Q)C1-1VLD. Taft Charter High School is located approximately 0.4 miles to the southeast of the Project Site and is zoned PF-1XL. Residential land uses are located beyond the commercial development on the south side of Ventura Boulevard. Interstate 101 is located just to the north of the Project Site and is zoned PF-1XL. Residential land uses are also located beyond Interstate 101 to the north.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the demolition and removal of the existing remnant building foundation, parking areas, and 19 trees, from the Project Site and development of the site with a 158,371-square-foot climate-controlled self-storage facility, which would include a 1,015-square-foot office associated with the storage facility operations, and 1,400 square feet of either neighborhood-serving retail or office use.[5] The building would be three stories tall (a maximum building height of 38 feet and 3 1/8 inches) over two basement levels. Project plans are shown in Figures 3-5 through 3-16.

[5] *The gross square footage of the proposed building is 158,317 square feet, and the net square footage is 146,012 square feet.*

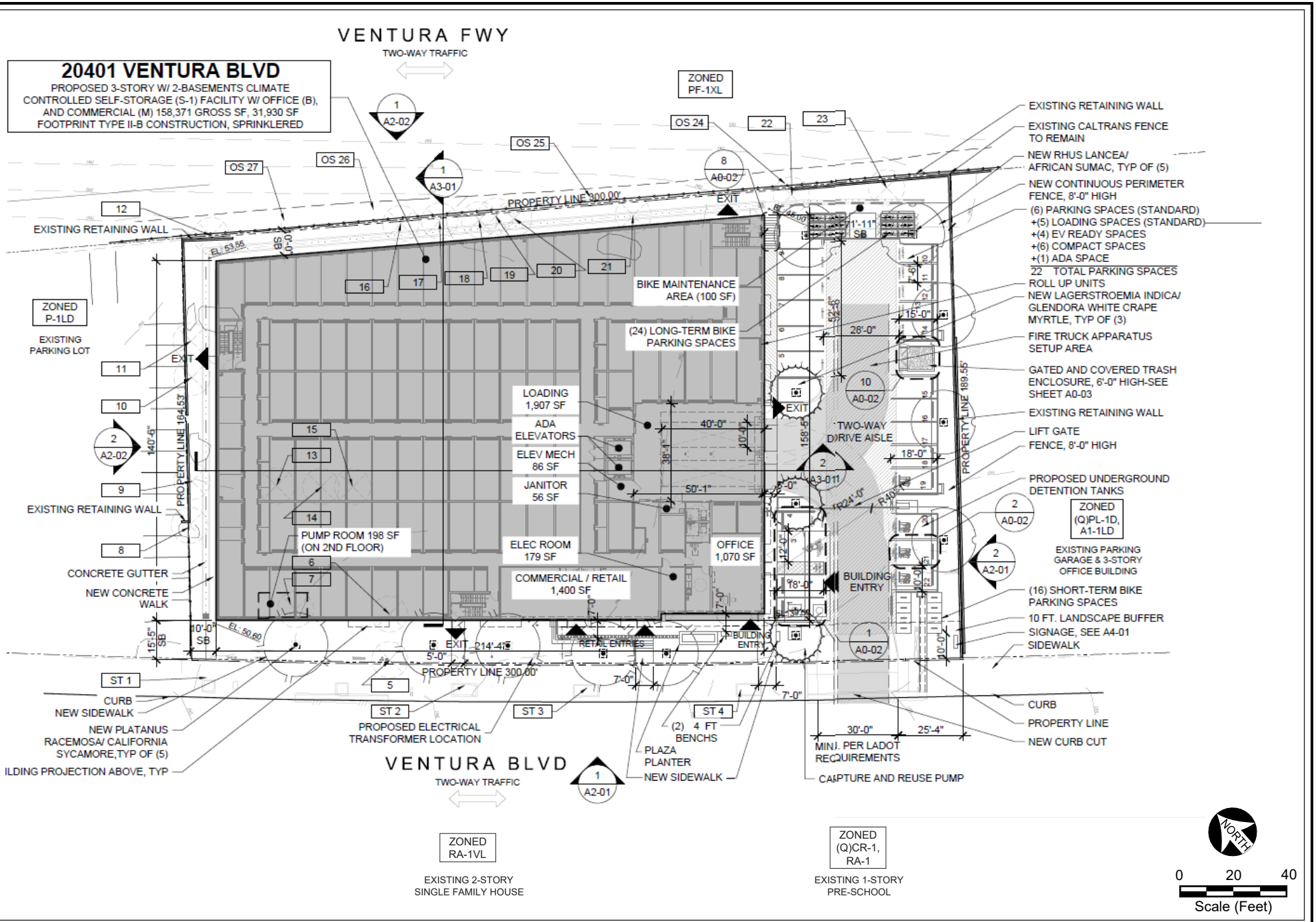


Figure 3-5
Project Site Plan

Source: SGW Architecture & Design, 2022.



Figure 3-6
Lower Basement Floor Plan

Source: SGW Architecture & Design, 2022.



Source: SGW Architecture & Design, 2022.

Figure 3-7
Basement Floor Plan

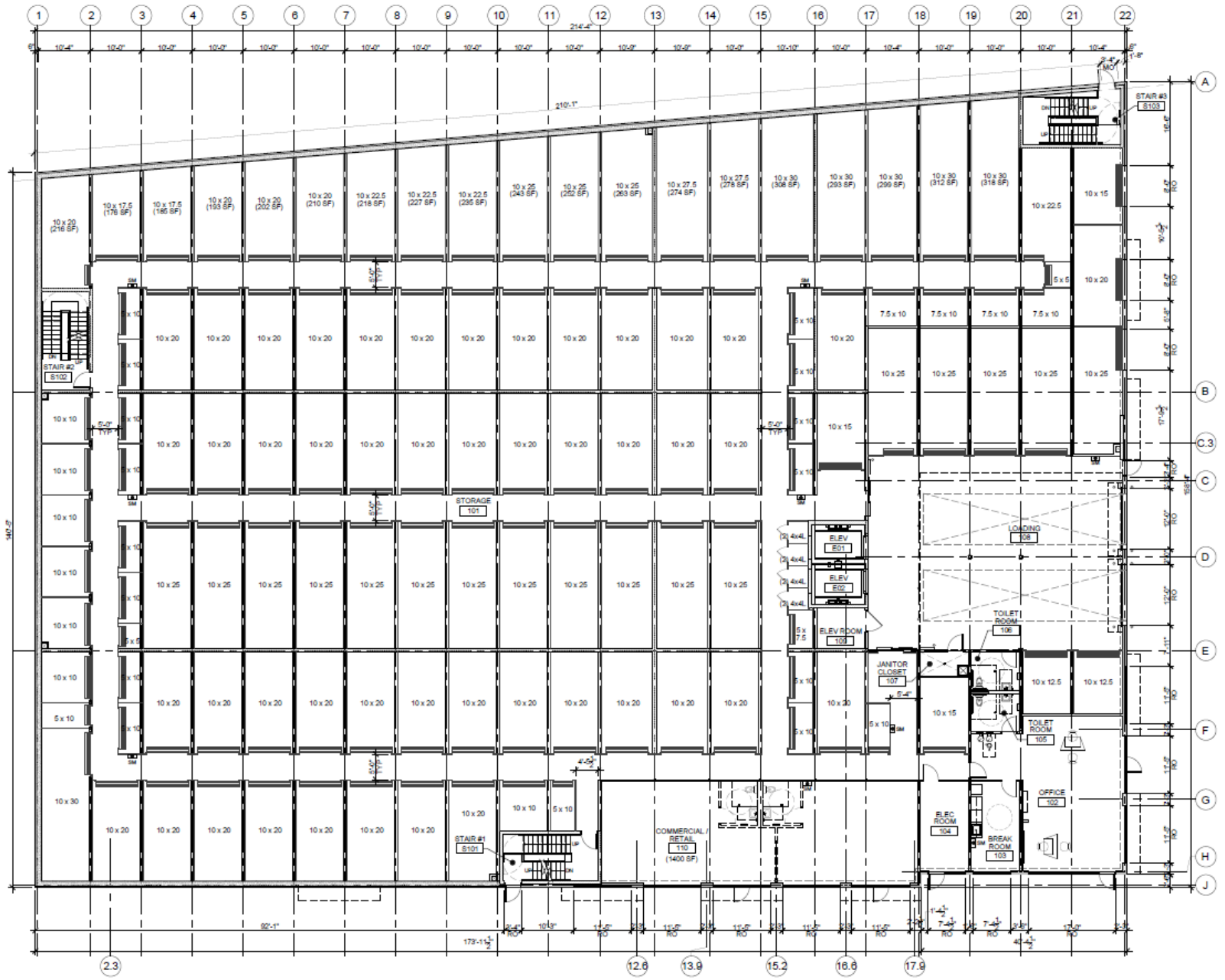


Figure 3-8
First Floor Plan

Source: SGW Architecture & Design, 2022.

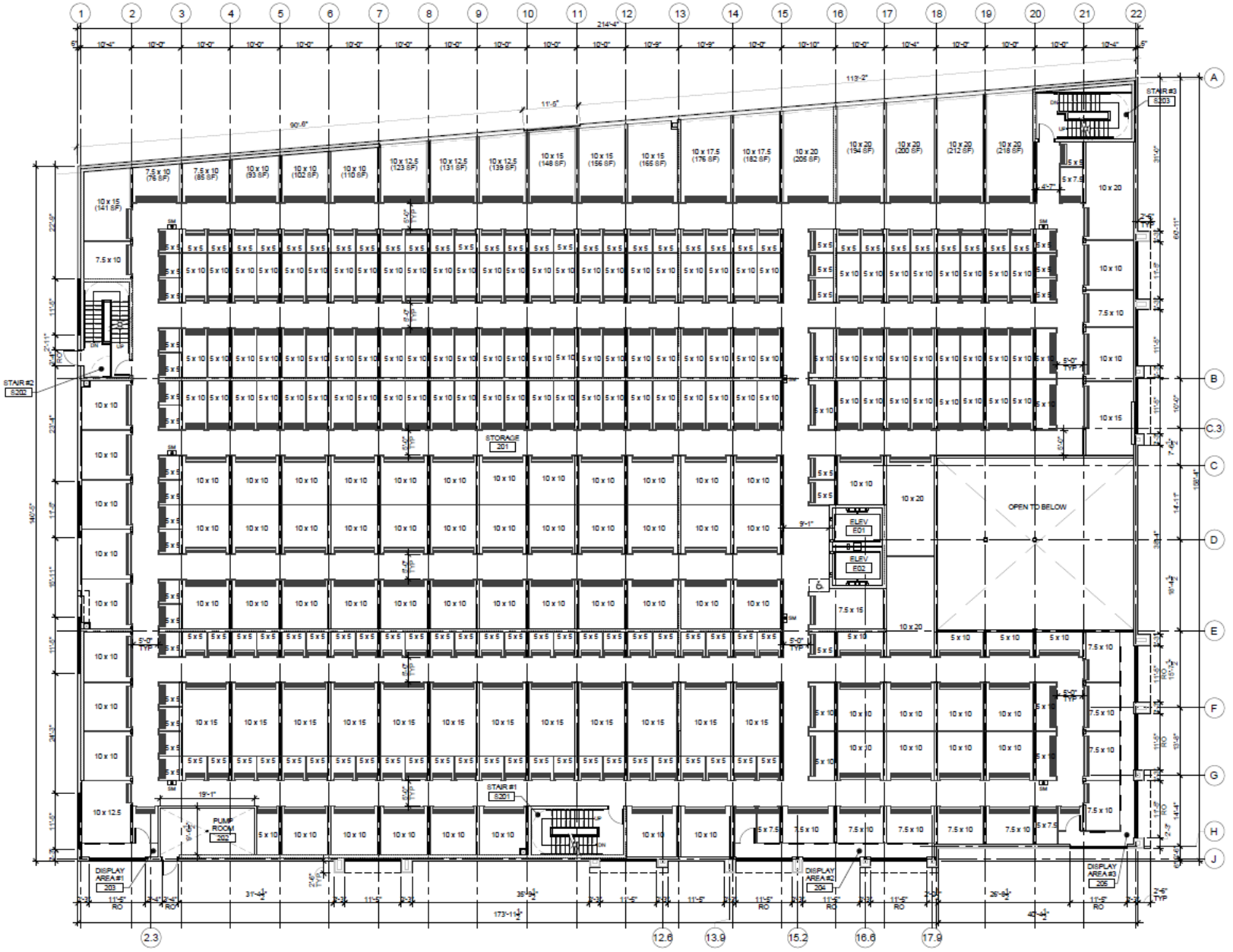


Figure 3-9
Second Floor Plan

Source: SGW Architecture & Design, 2022.



Figure 3-10
Third Floor Plan

Source: SGW Architecture & Design, 2022.

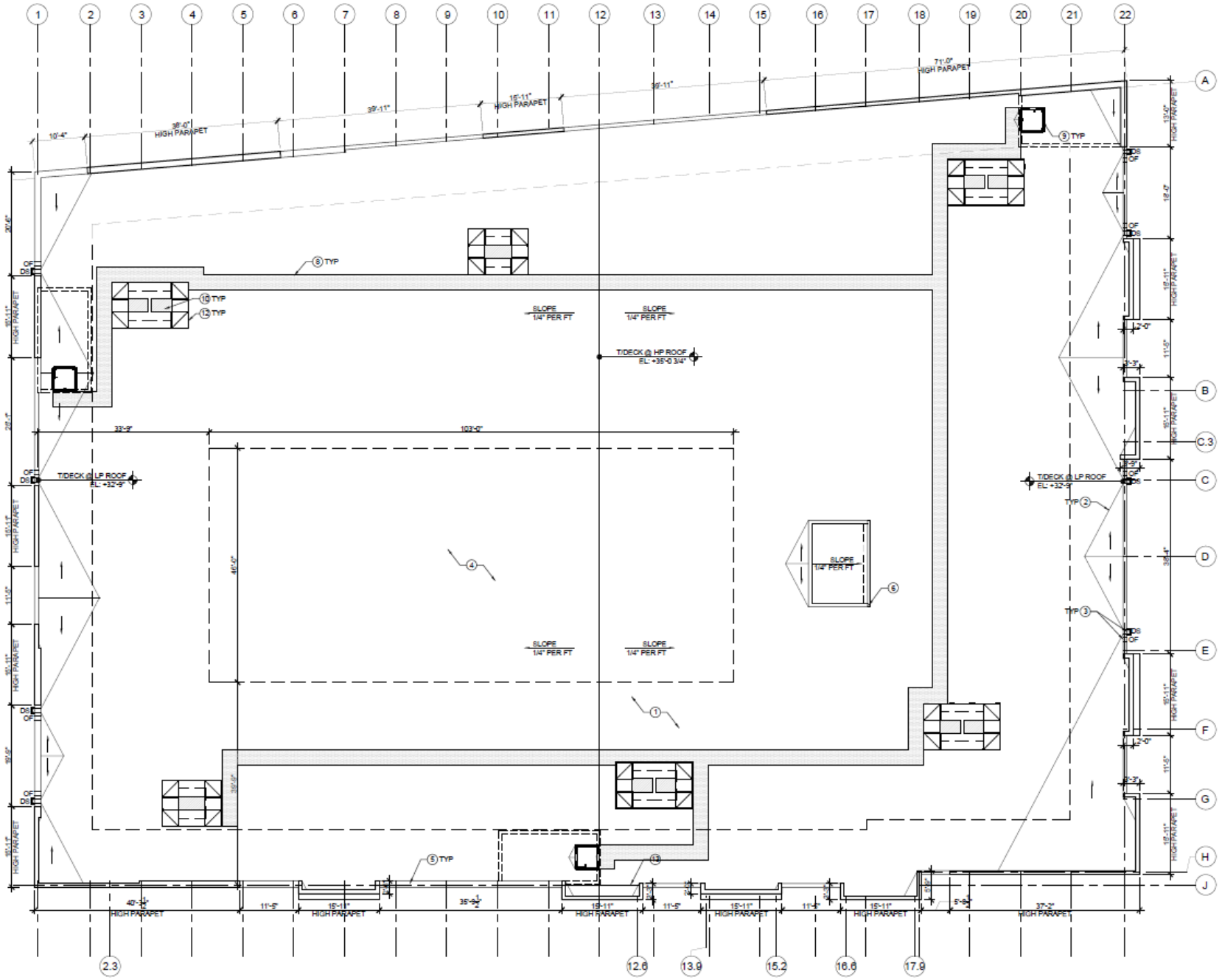


Figure 3-11
Roof Plan

Source: SGW Architecture & Design, 2022.

KEYNOTE LEGEND:

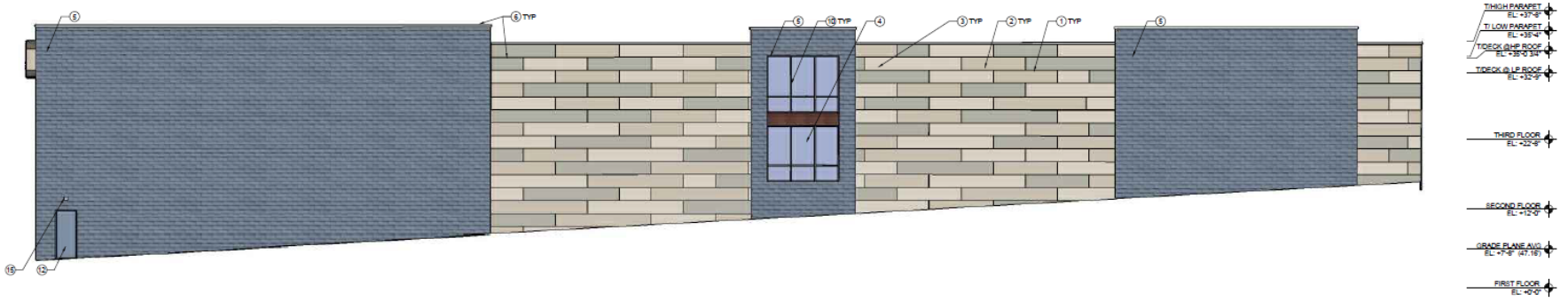
1. METAL PANEL 1 - METAL SALES 22 GA COLOR: ASH GREY
2. METAL PANEL 2 - METAL SALES 22 GA COLOR: OLD ZINC GREY
3. METAL PANEL 3 - METAL SALES 22 GA COLOR: OLD TOWN GREY
4. FIBER CEMENT PANEL - NICHIHA PANEL COLOR: VINTAGEWOOD CEDAR
5. PREFINISHED METAL SHINGLE SIDING - METAL DESIGN SYSTEMS, SERIES 60, 2 COAT, FIRE RATED CORE, 5/8" DEPTH, SKIN THICKNESS .020" COLOR: LEAD GRAY
6. ALUMINUM COPING
7. RYTEC SPIRAL VT HIGH SPEED DOORS
8. ALUMINUM STOREFRONT SYSTEM
9. ALUMINUM DISPLAY WINDOWS
10. FAUX WINDOWS
11. SIGNAGE - BY OWNER
12. ALUMINUM SERVICE DOOR
13. ROLL UP DOOR
14. SCUPPER WITH COLLECTOR BOX & DOWNSPOUT
15. LIGHT FIXTURE (SEE ELECTRICAL)
16. LOUVER (SEE MECHANICAL)
17. OVERFLOW SCUPPER
18. 6" VINYL LETTERS APPLIED TO GLASS
19. EXHAUST FAN (SEE MECHANICAL)
20. 52" VERTICAL ENVISOR PANEL

MATERIAL LEGEND:

- METAL PANEL 1 - ASH GREY
- METAL PANEL 2 - OLD ZINC GREY
- METAL PANEL 3 - OLD TOWN GREY
- FIBER CEMENT NICHIHA PANEL - VINTAGEWOOD CEDAR
- PREFINISHED METAL SHINGLE SIDING - LEAD GRAY



EAST ELEVATION



NORTH ELEVATION

Figure 3-12
East and North Elevations

Source: SGW Architecture & Design, 2022.

KEYNOTE LEGEND:

1. METAL PANEL 1 - METAL SALES 22 GA
   COLOR: ASH GREY
2. METAL PANEL 2 - METAL SALES 22 GA
   COLOR: OLD ZINC GREY
3. METAL PANEL 3 - METAL SALES 22 GA
   COLOR: OLD TOWN GREY
4. FIBER CEMENT PANEL - NICHIHA PANEL
   COLOR: VINTAGEWOOD CEDAR
5. PREFINISHED METAL SHINGLE SIDING -
   METAL DESIGN SYSTEMS, SERIES 60,
   2 COAT, FIRE RATED CORE, 5/8" DEPTH,
   SKIN THICKNESS .020"
   COLOR: LEAD GRAY
6. ALUMINUM COPING
7. RYTEC SPIRAL VT HIGH SPEED DOORS
8. ALUMINUM STOREFRONT SYSTEM
9. ALUMINUM DISPLAY WINDOWS
10. FAUX WINDOWS
11. SIGNAGE - BY OWNER
12. ALUMINUM SERVICE DOOR
13. ROLL UP DOOR
14. SCUPPER WITH COLLECTOR BOX & DOWNSPOUT
15. LIGHT FIXTURE (SEE ELECTRICAL)
16. LOUVER (SEE MECHANICAL)
17. OVERFLOW SCUPPER
18. 6" VINYL LETTERS APPLIED TO GLASS
19. EXHAUST FAN (SEE MECHANICAL)
20. 52" VERTICAL ENVISOR PANEL

MATERIAL LEGEND:

- METAL PANEL 1 - ASH GREY
- METAL PANEL 2 - OLD ZINC GREY
- METAL PANEL 3 - OLD TOWN GREY
- FIBER CEMENT NICHIHA PANEL - VINTAGEWOOD CEDAR
- PREFINISHED METAL SHINGLE SIDING - LEAD GRAY



WEST ELEVATION



SOUTH ELEVATION

Figure 3-13
West and South Elevations

Source: SGW Architecture & Design, 2022.



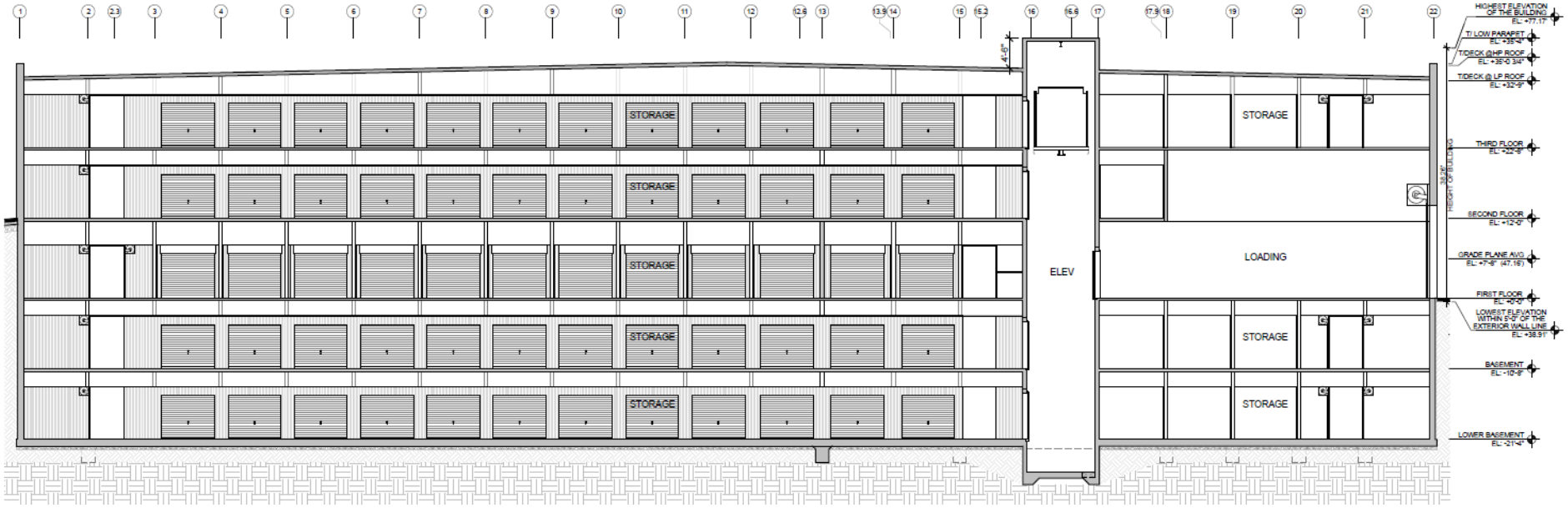
LOOKING NORTH
ON VENTURA BLVD



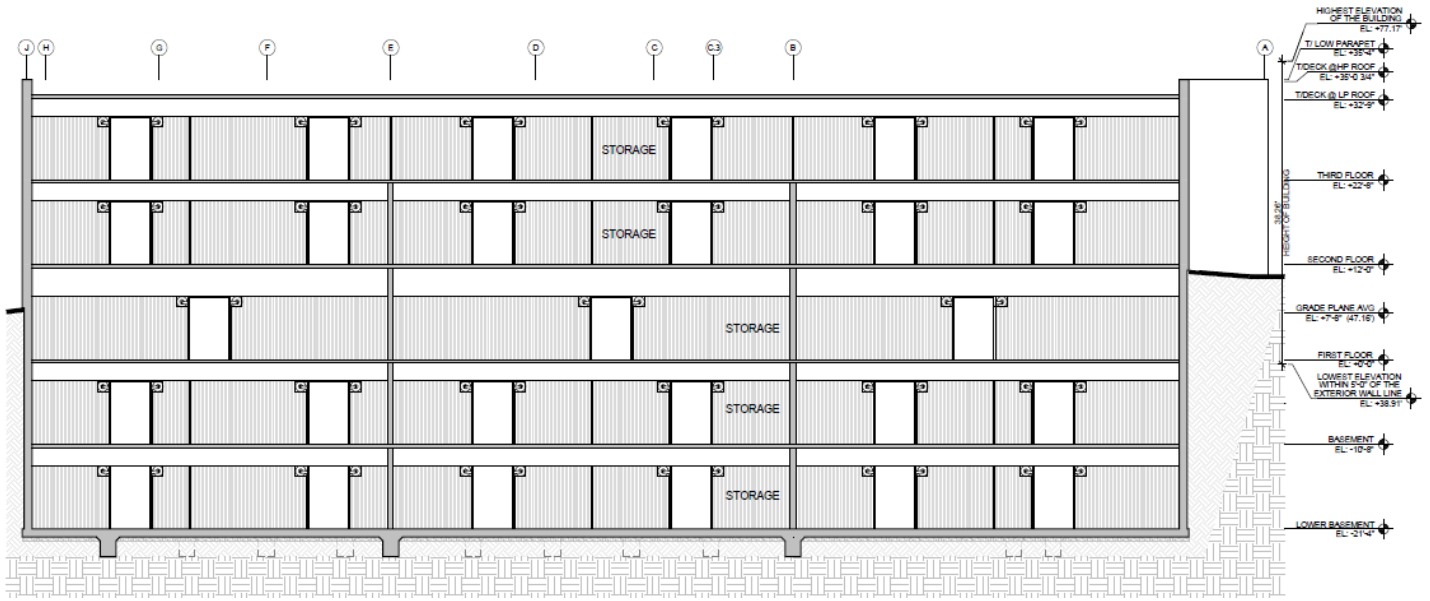
LOOKING WEST
ON VENTURA BLVD

Source: SGW Architecture & Design, 2022.

Figure 3-14
Perspectives



BUILDING SECTION



BUILDING SECTION

Source: SGW Architecture & Design, 2022.

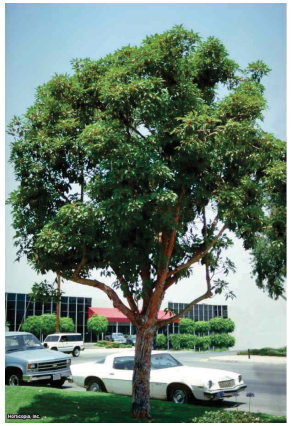
Figure 3-15
Building Sections



Platanus racemosa



Quercus ilex



Lophostemon confertus



Myoporum parvifolium



Olea europaea `Little Ollie`



Salvia greggii `Flame`

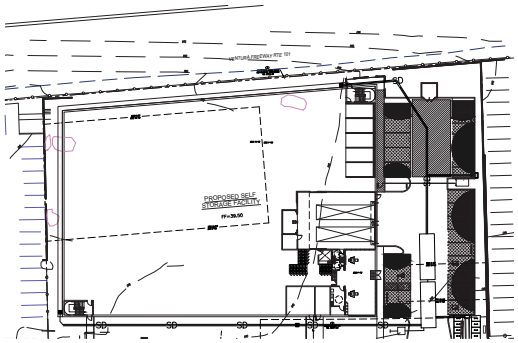
Shade and Landscape Area Calculations

SYMBOL	DESCRIPTION	QTY
	Parking Area to be Shadded	3,982 sf (50% = 1,991 sf req.)
	Parking Area Affective Shade	1,992 sf (>50% req.)

Site area: 53,433 sf

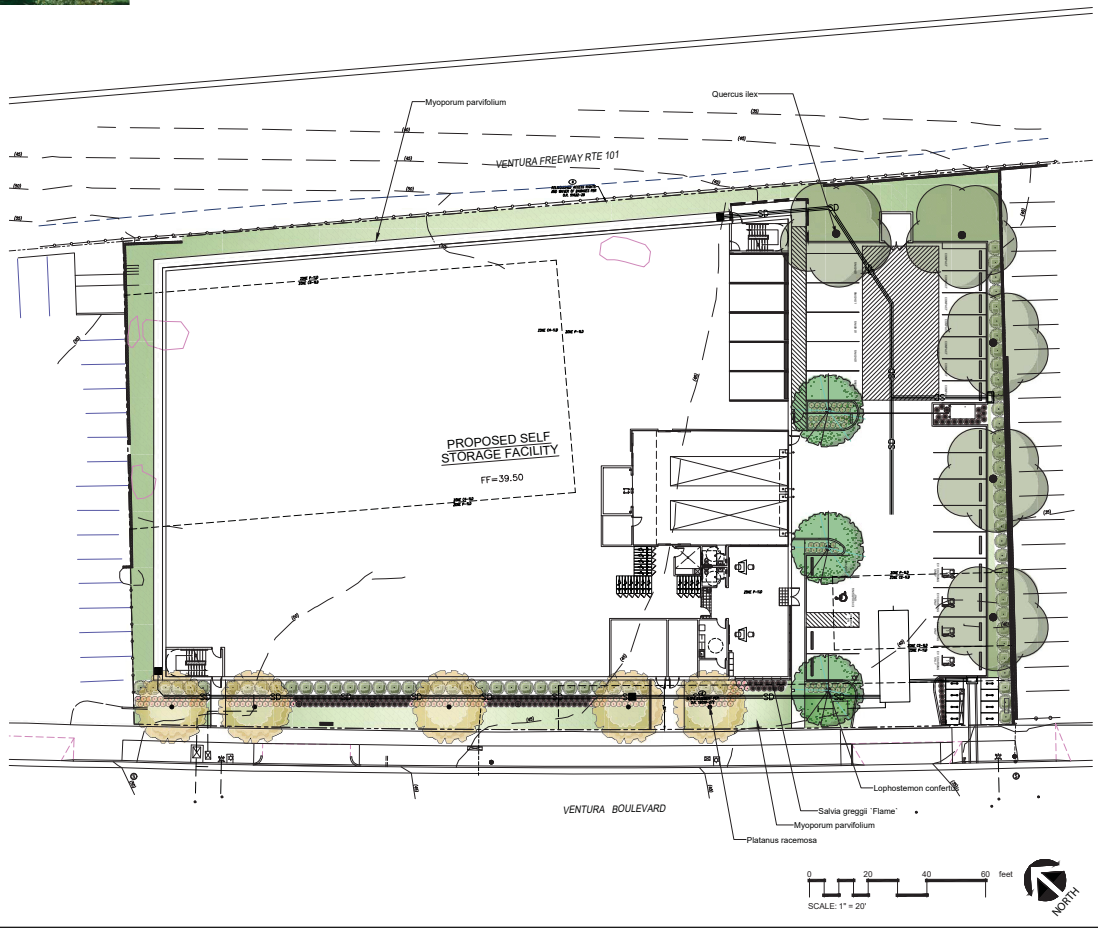
Landscape area: 8,881.7 sf (16.6%)

SHADING PLAN
NTS



PLANT SCHEDULE

TREES	QTY	BOTANICAL / COMMON NAME	CONT
	3	Lophostemon confertus / Brisbane Box	24" Box Standard
	5	Platanus racemosa / California Sycamore Multi-Trunk Oak 3985 replacements est. value $7,000.00 Mitigation Trees	48" Box Multi
	5	Quercus ilex / Holly Oak	24" Box
SHRUBS	**QTY**	**BOTANICAL / COMMON NAME**	**CONT**
	71	Olea europaea `Little Ollie` TM / Little Ollie Olive	5 gal
	298	Salvia greggii `Flame` / Flame Autumn Sage	5 gal
GROUND COVERS	**QTY**	**BOTANICAL / COMMON NAME**	**CONT**
	11,006	Myoporum parvifolium / Trailing Myoporum	Flats



Source: CCA Architects, 2022.

Figure 3-16
Planting Plan

3.3.2 Access, Parking, and Loading

Vehicular access to the Project would occur via one (1) driveway on Ventura Boulevard at the southeast corner of the Project Site.

As shown in Table 3-2, the Project's vehicle parking requirement is 43 parking spaces. However, as discussed below under the subheading "3.4 Requested Discretionary Approvals," the Applicant is requesting a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required. Vehicle parking would be accommodated in a surface parking lot located in the eastern portion of the Project Site.

As shown in Table 3-3, the Project's bicycle parking requirement is 16 short-term and 16 long-term spaces; the Project would provide 16 short-term spaces and 24 long-term spaces. The short-term bicycle parking spaces would be provided at the southeastern corner of the Project Site, while the long-term bicycle parking spaces would be provided inside the building on the ground floor. All long-term bicycle parking would be accessible to commercial users.

As shown in Figure 3-8, a loading area would be located interior of the building, with additional loading areas located within the surface parking lot in the northeastern portion of the Project Site.

Table 3-2
Project Vehicle Parking

Land Use	Size	Parking Requirement	Required Parking (spaces)[1]
Warehouse[2]	144,612 sf[3]	1 space/500 sf for the first 10,000 sf and 1 space/5,000 sf in excess of first 10,000 sf	47
Commercial/Retail	1,400 sf	1 space/250 sf	6
		Total Required	**53**
		20% Reduction for Additional Bicycle Parking	***10***
		Total Required after Reduction	**43**

sf = square feet

1 Numbers have been rounded to the closest 10.
2 Vehicle parking for the proposed office associated with the operation of the self-storage use is inclusive of the vehicle parking required for the self-storage use.
3 Vehicle parking calculations are based on net square footage.

Source: SGW Architecture & Design, December 21, 2022.

Table 3-3
Project Bicycle Parking

Land Use	LAMC Bicycle Parking Requirement	Bicycle Parking Spaces
Warehouse 146,012 sf[1]	 Short-term = 1 space/10,000 sf Long-term = 1 space/10,000 sf	 Short-term = 14 Long-term = 14
Commercial/Retail 1,400 sf	 Short-term = 1 space/10,000 sf (minimum 2 spaces) Long-term = 1 space/10,000 sf (minimum = 2 spaces)	 Short-term = 2 Long-term = 2
	Total Bicycle Parking Required	**Short-term = 16** **Long-term = 16**
	Total Bicycle Parking Provided	**Short-term = 16** **Long-term = 24**

sf = square feet *LAMC = Los Angeles Municipal Code*

[1] Bicycle parking calculations are based on net square footage.

Source: SGW Architecture & Design, December 21, 2022.

3.3.3 Site Security

The Project would include security fencing along three sides of the Project Site, a secure access gate limited to use by customers and employees, and 24-hour camera surveillance. Additionally, the entire building would be self-contained with access to the storage units restricted from the interior of the building. Site development would be reviewed by the City to ensure that public safety is considered and addressed, and the Project would be required to adhere to conditions of approval required by the City.

3.3.4 Signage

Project signage would include four (4) Wall Signs and one (1) Monument Sign. All proposed signage would conform to the size, type, and placement requirements in the Ventura-Cahuenga Boulevard Corridor Specific Plan.

3.3.5 Tree Removal and Replacement

As stated previously, there are 19 trees on the Project Site, four (4) trees located offsite in the Caltrans ROW north of the Project Site, and four (4) street trees located in the ROW south of the Project Site (refer to Table 3-1).[6] The 19 trees on the Project Site would be replaced in accordance with the City's tree replacement requirements. The offsite and ROW trees would be protected in place.[7]

[6] City of Los Angeles Tree Report, Carlberg Associates, June 11, 2022. Refer to Appendix A.

[7] One of the ROW trees south of the Project Site is dead.

3.3.6 Anticipated Construction Schedule

The Project's construction phase would occur over a 19-month period. The estimated construction schedule is shown in Table 3-4. The Project would require the export of approximately 32,598 cubic yards of material during the demolition phase and 41,000 cubic yards of soil and material during the grading phase.[8]

Table 3-4
Estimated Construction Schedule

Phase	Schedule	Notes
Demolition	Month 1	Removal of 32,598 cubic yards of asphalt/concrete, foundation remnant, trees, plants, weeds, etc., hauled 25 miles to receptor site in 10-cubic yard capacity trucks
Site Preparation	Month 2	-
Grading	Months 3 – 4	Approximately 61,585 cubic yards of soil (including a 56% swell factor for topsoil and a 50% swell factor for dry clay) hauled 25 miles to receptor site in 10-cubic yard capacity trucks
Trenching	Months 5 – 7	Trenching for utilities, including gas, water, electricity, and telecommunications
Building Construction	Months 5 – 19	Includes assembly of shoring, installation of floor slabs, columns, and walls for two levels of subterranean structures. Footings and Foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, interior painting, cabinetry and carpentry, elevator installations, low voltage systems, trash management
Paving	Month 18	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 17-19	Application of interior and exterior coatings and sealants

3.4 REQUESTED DISCRETIONARY APPROVALS

The Applicant is seeking the following discretionary approvals from the City:

1. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32.Q, a Vesting Zone Change and Height District Change from P-1LD, C2-1LD, and C4-1LD to C2-2LD;

[8] *The Project would include approximately 41,000 cubic yards of soil export. However, the analysis in the MND assumes an additional swell factor for a conservative estimate of impacts.*

2. Pursuant to LAMC Section 12.24.W.50, a Conditional Use to allow for the development of a storage building for household goods within 500 feet of a residential use;

3. Pursuant to LAMC Section 11.5.7.F, Specific Plan Exceptions from the Ventura/Cahuenga Boulevard Corridor Specific Plan (Ordinance No. 166,560) in conjunction with the development of a mixed-use building to permit:

    a. 158,371 square feet of floor area in lieu of 53,433 square feet permitted for a 2.96:1 FAR in lieu of a 1.0:1 FAR permitted in Section 6.B.3;

    b. 37 feet 7½ inches in height in lieu of 30 feet as permitted in the Specific Plan Section 7.E 1.e.2; and

    c. relief from the stepback requirements of the specific plan Section 7.E.1.f;

4. Pursuant to LAMC Section 11.5.7.C, and Section 9 of the Ventura/Cahuenga Boulevard Corridor Specific Plan, a Specific Plan Project Permit Compliance Review to permit the construction of a mixed-use with two subterranean levels, containing self-storage for household goods and commercial/retail spaces, and a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required; and

5. Pursuant to LAMC Section 16.05, Site Plan Review for a development of a project resulting in a net increase of 50,000 square feet of nonresidential floor area.

Other approvals and permits from the Department of Building and Safety, Public Works and other jurisdictional agencies would be required for Project construction actions including, but not limited to demolition, haul route, excavation, shoring, grading, building, infrastructure, tree removal, temporary street closure, sign permit(s), and tenant improvements.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

No Impact. The Project Site is located in a highly urbanized area of the City of Los Angeles (City). Views from within the Project Site area are largely limited to typical urban development (e.g., buildings/structures, signage, lighting, roadway infrastructure, etc.). No scenic views are available from within the Project Site area. Additionally, the Project Site is not in or near a designated scenic vista. The Project would not have a substantial adverse effect on a scenic vista. Therefore, no impacts related to scenic vistas would occur as a result of the Project.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. The Project Site is not visible from any state scenic highways. Additionally, the site does not contain any rock outcroppings or historic structures. Ventura Boulevard (adjacent to the Project Site to the south) extending from Valley Circle Boulevard to Interstate 405 is designated as a scenic highway per the City's Mobility Plan 2035 (an element of the City's General Plan). The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. Based on the Arborist Report prepared for the Project (refer to Appendix A), there are 19 non-protected, significant trees on the Project Site, four (4) offsite trees located in the Caltrans right-of-way (ROW) north of the Project Site, and four (4) street trees located in the ROW south of the Project Site (refer to Table I-1). Significant trees are defined by the City as trees having a diameter of eight inches or greater at breast height. With the exception of these trees, no scenic resources are located on the Project Site. The 19 onsite trees would be removed and replaced in accordance with the Urban Forestry Division of Street Services Bureau's tree replacement requirements for non-protected trees. The offsite and ROW trees would be protected in place.[1] Compliance with the City's tree replacement requirements would ensure no significant impacts related to trees as scenic resources would occur. Therefore, Project impacts related to scenic resources would be less than significant.

Table I-1
Project Site Trees and ROW Trees

Tree Species		
Scientific Name	**Common Name**	**Quantity/Location**
Pinus halepensies	Aleppo pine	2 onsite 1 offsite
Eucalyptus polyanthemos	silver dollar gum	3 offsite
Pinus canariensis	Canary Island pine	2 onsite
Pyrus kawakamii	evergreen pear	2 onsite
Lingustrum lucidum	glossy privet	2 onsite
Juniperus chinesis 'Torulosa'	Hollywood juniper	1 onsite
Washingtonia robusta	Mexican fan palm	6 onsite
Fraxinus uhdel	Shamel ash	4 onsite
Liquidambar styraciflua	American sweetgum	4 ROW[1]
	Total	**19 onsite** **4 offsite** **4 ROW[1]**

ROW = right-of-way
[1] One of these trees is dead.

Source: City of Los Angeles Tree Report, Carlberg Associates, June 11, 2022. Refer to Appendix A.

[1] *One of these trees is dead.*

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 on Ventura Boulevard in an urbanized area of the City. As stated previously, Ventura Boulevard is designated as a scenic highway in the Mobility Plan 2035. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. Land uses surrounding the Project Site include surface parking lots to the east and west; the 101 Freeway to the north; and Ventura Boulevard to the south. Other land uses in the vicinity of the Project Site include the mix of commercial, residential, and institutional land uses along Ventura Boulevard east and west of the Project Site and residential land uses that lie beyond the southern developed side of Ventura Boulevard. The visual character of the Project Site and surrounding area is that of an urbanized city fully developed with a mix of low- to medium-rise buildings along the Ventura Boulevard corridor interspersed with signage, lighting, and utility and roadway infrastructure.

The Project includes the demolition and removal of the existing restaurant foundation remnant, parking lot, and trees at the Project Site and the development of the site with a 158,371-square-foot climate-controlled self-storage facility, inclusive of a 1,015-square-foot office associated with the facility operations and 1,400 square feet of neighborhood-serving retail uses. The building would be three stories tall (a maximum building height of 37 feet and 7½ inches) over two (2) basement levels.

Regulations governing scenic quality that apply to the Project include the Citywide Design Guidelines, which are intended, among other things, to communicate the City's design expectations, facilitate fair and consistent application of design objectives, and encourage the development of projects appropriate to the context of the City's climate and urban environment, and include the following:

1. Promote a safe, comfortable, and accessible pedestrian experience for all.

2. Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

3. Design projects to actively engage with streets and public space and maintain human scale.

4. Organize and shape projects to recognize and respect surrounding context.

5. Express a clear and coherent architectural idea.

6. Provide amenities that support community building and provide an inviting, comfortable user experience.

7. Carefully arrange design elements and uses to protect site users.

8. Protect the site's unique natural resources and features.

9. Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

10. Enhance green features to increase opportunities to capture stormwater and promote habitat.

As required by the City, the Applicant completed the Citywide Design Guidelines Compliance Review Form for the Project that was submitted to the City as part of the Project's application. This form is included in Appendix B. The City has determined that the Project complies with the Citywide Design Guidelines. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, Project impacts related to scenic quality would be less than significant.

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

Less Than Significant Impact. The Project Site is located within the Ventura Boulevard corridor in a highly urbanized area of the City. The Project Site is currently developed with a foundation remnant of a previous restaurant and surface parking areas. Land uses surrounding the Project Site include surface parking lots to the east and west; the 101 Freeway to the north; and Ventura Boulevard to the south. Other land uses in the vicinity of the Project Site include the mix of commercial, residential, and institutional land uses along Ventura Boulevard east and west of the Project Site and residential land uses that lie beyond the southern developed side of Ventura Boulevard. All of these land uses produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, vehicle lighting, etc.) typical of such uses in an urban area. The Project would include interior and exterior lighting that complies with the LAMC provision that requires minimizing the effect of the new sources of lighting. Consequently, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would be required to use non-reflective glass, pursuant to LAMC Section 93.0117. The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, Project impacts related to light and glare would be less than significant.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). This related project does not share scenic resources in common with the Project. Additionally, the related project is not visible from a scenic highway. Further, the related project is subject to the same Citywide Design Guidelines as the Project and would be required to comply with applicable design standards. Because the related project is infill development in a highly urbanized area, the potential increase in light and glare would be negligible, as the related project would replace existing uses with existing sources of light and glare and would be required to comply with existing regulations related to lighting and low-glare building materials. No significant cumulative aesthetics impacts would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

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

No Impact. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act Contract.[3] Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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

No Impact. The Project Site is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site does not contain any forest land. Therefore, no impacts related to this issue 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. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Therefore, no impacts related to this issue would occur.

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2 *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

3 *Ibid.*

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Neither the Project Site nor the site of the related project is used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

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

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

The information and analysis presented below are based on the following source, which is included in Appendix D:

- *Air Quality Technical Report, DKA Planning, January 2023.*

Regulatory Framework

Federal

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of some portions of the CAA (e.g., certain mobile sources and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the 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 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS has been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, 2.5 microns ($PM_{2.5}$), particulate matter, 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table III-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for nitrogen oxides (NO_X) emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions.

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

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	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)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

[1]N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, 2020 (www.arb.ca.gov/desig/adm/adm.htm).

The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

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 California Clean Air Act (CCAA). In California, 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 endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized in Table III-1.

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

desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Toxic Air Contaminant Identification and Control Act. The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing H2S at levels above the state standard could result in exposure to a disagreeable rotten eggs odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[4] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. Since inception of the

[4] *California Air Resources Board, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.*

program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[5] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007, for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

Assembly Bill 2588 Air Toxics "Hot Spots" Program. The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective. The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.[6] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

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5 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

6 *California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

Air Quality and Land Use Handbook. CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional (South Coast Air Quality Management District)

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Site area), Riverside, and San Bernardino counties. The Basin 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.

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area

sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

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

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

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

Air Quality Management Plan. SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region's air quality attainment plan to address the "extreme" O_3 non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NO_x emissions by 67 percent more than required by adopted rules and regulations in 2037. The 2022 AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V, released in August 2021.[7] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. The report finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the number in MATES IV (2012) (page ES-13). The monitoring program

[7] *South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v, accessed January 19, 2023.*

measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (Figure ES-2).

Regional (Southern California Association of Governments)

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. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. 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, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) on September 23, 2020. The 2020-2045 RTP/SCS aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The plan calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by 3 percent
- Reducing per capita VMT by 5 percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by 2 percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually

- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

Local (City of Los Angeles)

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

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.

Clean Up Green Up Ordinance. The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. This ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

California Environmental Quality Act. In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

Land Use Compatibility. In November 2012, the Los Angeles City Planning Commission (CPC) issued an advisory notice (Zoning Information 2427) regarding the siting of sensitive land uses within 1,000 feet of freeways. The CPC deemed 1,000 feet to be a conservative distance to evaluate projects that house populations considered to be more at-risk from the negative effects of air pollution caused by freeway proximity. The CPC advised that applicants of projects requiring discretionary approval, located within 1,000 feet of a freeway and contemplating residential units and other sensitive uses (e.g., hospitals, schools, retirement homes) perform a Health Risk Assessment (HRA). The Project Site is located 100 feet south of the eastbound mainline of the Ventura Freeway (US-101).

On April 12, 2018, the City updated its guidance on siting land uses near freeways, resulting in an updated Advisory Notice effective September 17, 2018, requiring all proposed projects within 1,000 feet of a freeway adhere to the Citywide Design Guidelines, including those that address freeway proximity. It also recommended that projects consider avoiding location of sensitive uses like schools, day care facilities, and senior care centers in such projects, locate open space areas as far from the freeway, locate non-habitable uses (e.g., parking structures) nearest the freeway, and screen project sites with substantial vegetation and/or a wall barrier. Requirements for preparing HRAs were removed.

Existing Conditions

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants

include CO, O_3, NO_x, sulfur oxides (SO_x), PM_{10}, $PM_{2.5}$, and Pb. Below is a description of each criteria air pollutant and their health effects are based on information provided by the SCAQMD.[8]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when volatile organic compounds (VOCs) and NO_X – both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, 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 scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

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

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter

8 *South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Pb is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood-forming processes in the body.

State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_x, as well as particulate matter.

Sulfates (SO_4^{2-}). SO_4^{2-} are the fully oxidized ionic form of sulfur. SO_4^{2-} occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of SO_4^{2-} exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that

use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants (TACs)

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. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). 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.[9]

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [µm]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 µm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[10]

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9 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

10 *California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.*

Project Site

As stated previously, the Project Site is located within the Basin, named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile 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. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties composing the Basin. The USEPA has classified Los Angeles County as nonattainment areas for O_3, $PM_{2.5}$, and Pb. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions which produce O_3 and the majority of particulate matter.

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's West San Fernando Valley receptor area (Area 6). Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table III-2 shows pollutant levels, state and federal standards, and the number of exceedances recorded in the area from 2019 through 2021. The one-hour state standard for O_3 was exceeded 19 times during this three-year period, including fourteen times in 2020. The federal standard was exceeded 86 times in that same period. In addition, the daily federal standard for $PM_{2.5}$ was exceeded three times. CO and NO_2 levels did not exceed the CAAQS from 2019 to 2021 for 1-hour (and 8-hour for CO).

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2019	2020	2021
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.101	0.142	0.110
Days > 0.09 ppm (State 1-hour standard)	1	14	4
Days > 0.070 ppm (Federal 8-hour standard)	6	49	31
Carbon Monoxide (CO_2)			
Maximum 1-hour Concentration (ppm)	2.6	1.9	2.6
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	2.2	1.5	1.9
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0644	0.0572	0.0542
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration ($\mu g/m^3$)	N/A	N/A	N/A
Days > 50 $\mu g/m^3$ (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$			
Maximum 24-hour Concentration ($\mu g/m^3$)	30.0	27.6	55.5
Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	0	0	3
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

ppm = parts by volume per million of air $\mu g/m^3$ = micrograms per cubic meter
N/A = not available at this monitoring station

Source: SCAQMD annual monitoring data at West San Fernando Valley subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year), accessed January 13, 2023.

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 91364) is approximately 285 in a million.[11] The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the Ventura Freeway 100 feet to the

[11] *South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed June 16, 2022.*

north). In general, the risk at the Project Site is higher than 11 percent of the population across the Basin.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037137501) is located in the 58th percentile, which means the Project Site has an overall environmental pollution burden higher than at least 58 percent of other communities within California.[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. CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located along the Ventura Boulevard corridor in Woodland Hills, a commercial and residential center. Sensitive receptors in proximity of the Project Site include, but are not limited to, the following representative sampling:

- Sunrise of Woodland Hills, assisted living facility; 20461 Ventura Boulevard; 70 feet west of the Project Site.
- Kol Tikvah Early Childhood Center, 20400 Ventura Boulevard; 130 feet south of the Project Site.
- Multi-family residences; 20500 Ventura Boulevard; 170 feet south of the Project Site
- Woodcourt Medical Building, 20251-20315 Ventura Boulevard; 400 feet east of the Project Site.
- Residences, 20400 block of Clark Street; 490 feet north of the Project Site across the Ventura Freeway.
- Taft High School, 5461 Winnetka Avenue; 670 feet east of the Project Site.

12 *Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_85-1727ac1da3ba490bbc43c6f4ebe91539%3A3535&views=view_38%2Cview_7, accessed June 16, 2022.*

Existing Project Site Emissions. The Project Site is currently vacant of any improvements aside from a surface parking lot and remnants of a former restaurant building. As such, there are no anthropogenic emissions of criteria pollutants that are generated at the Project Site.

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

Less Than Significant Impact. SCAQMD is the agency primarily responsible for comprehensive air pollution control in the Basin and reducing pollutant emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2022 AQMP to meet federal and state ambient air quality standards. A significant impact could occur if a project is inconsistent with the A2022 QMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The Project would neither conflict with the SCAQMD's 2022 AQMP nor jeopardize the region's attainment of air quality standards. The 2022 AQMP focuses on achieving clean air standards while accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2020-2045 RTP/SCS are largely built off local growth forecasts from local governments, such as the City. The 2020-2045 RTP/SCS accommodates up to 4,771,300 persons; 1,793,000 households; and 12,135,900 jobs in the City by 2045.

The Project includes removal of all existing improvements from the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, and associated parking lot. The Project would not add any permanent residents to the Community Plan area, City, or to the South Coast Air Basin. As such, the Project would be consistent with the 2022 AQMP, which focuses on accommodating population growth over time. Furthermore, the Project would not conflict with the growth assumptions in the regional air plan. Therefore, Project impacts related to AQMP consistency would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if a project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. An Air Quality Technical Report for the Project was prepared by DKA Planning, dated January 2023 (refer to Appendix D). Project construction and operation emissions were estimated using California Emissions Estimator Model (CalEEMod), a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from land use projects.

Construction Emissions

Construction-related emissions were estimated using SCAQMD's CalEEMod 2022.1.1.5 model using assumptions from the Project's developer, including the Project's construction schedule of approximately 19 months (refer to Table III-3). The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to 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.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

As shown in Table III-3, the Project's construction-related emissions would not exceed SCAQMD's regional and local significance thresholds. Therefore, the Project's construction-related air quality impacts would be less than significant.

Table III-3
Estimated Daily Construction Emissions

Construction Phase Year	*Pounds Per Day*					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2023	1.8	45.2	23.5	0.2	9.8	3.7
2024	1.7	42.6	22.3	0.2	9.6	3.6
2025	24.6	7.4	14.1	<0.1	1.6	0.5
Maximum Regional Total	***24.6***	***45.2***	***23.5***	***0.2***	***0.8***	***3.7***
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	***N/A***	***12.6***	***11.4***	***N/A***	***2.7***	***1.6***
Localized Significance Threshold	*N/A*	*69*	*426*	*N/A*	*4*	*3*
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

N/A = Not Applicable

Note: The construction schedule used for the modeling of air quality emissions in the CalEEMod software is an estimate. If construction activities commence later than what is assumed in this analysis, the actual emissions would be lower than disclosed here because of the increasing penetration of newer equipment with lower certified emission levels. These emissions estimates are based on CalEEMod 2022.1.1.5 model runs (summer or winter season, whichever is higher). The LST analysis is based on a 1-acre site with 0-meter to 25-meter distances to receptors in West San Fernando Valley source receptor area.

Source: DKA Planning, 2023. Refer to Appendix D.

Operational Emissions

As shown in Table III-4, the Project's operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions. As a result, the Project's operational impacts on regional air quality would be less than significant.

Table III-4
Estimated Daily Project Operational Emissions

Emissions Source	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	5.0	0.1	7.0	<0.1	<0.1	<0.1
Energy Source	0.1	0.9	0.7	<0.1	0.1	0.1
Mobile Source	1.5	1.2	13.5	<0.1	1.1	0.2
Total Regional Emissions	***6.5***	***2.1***	***21.1***	***<0.1***	***0.0***	***0.3***
Regional Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Total	**5.1**	**1.0**	**7.7**	**<0.1**	**0.1**	**0.1**
Localized Significance Threshold	**N/A**	**69**	**426**	**N/A**	**2**	**1**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

N/A = Not Applicable

Note: The LST analysis is based on a 1-acre site with 0-meter to 25-meter distances to receptors in West San Fernando Valley source receptor area.

Source: DKA Planning, 2023. Refer to Appendix D.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors in the vicinity of the Project Site include the following:

- Sunrise of Woodland Hills, assisted living facility; 20461 Ventura Boulevard; 70 feet west of the Project Site.
- Kol Tikvah Early Childhood Center, 20400 Ventura Boulevard; 130 feet south of the Project Site.
- Multi-family residences; 20500 Ventura Boulevard; 170 feet south of the Project Site
- Woodcourt Medical Building, 20251-20315 Ventura Boulevard; 400 feet east of the Project Site.
- Residences, 20400 block of Clark Street; 490 feet north of the Project Site across the Ventura Freeway.
- Taft High School, 5461 Winnetka Avenue; 670 feet east of the Project Site.

Construction Emissions

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable localized screening threshold (LST) values presented in Table III-3, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. The LST values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table III-3, during construction of the Project, maximum daily localized emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is DPM) which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of DPM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily DPM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 19 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial DPM concentrations, and impacts would be less than significant.

Operational Emissions

The Project Site would be redeveloped with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail, and associated parking lot uses, land uses that are not associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

The primary sources of potential air toxics associated with Project operations would include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas-fired boilers). However, these activities and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[13] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit DPM emissions.

As the Project would not contain substantial TAC sources and would be consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are

[13] *South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would generate 235 vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025.[14] The majority of vehicle-related impacts at the Project Site would come from up to 22 vehicles entering and exiting the development during a peak hour. This would represent approximately 0.8 percent of the 3,002 vehicles currently using Ventura Boulevard at Petit Avenue in the A.M. peak hour.[15] This negligible contribution to local congestion would not substantially worsen conditions on Ventura Boulevard.

Finally, the Project would not result in any substantial emissions of TACs during the operational phase, since the Project would not include typical sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[16] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational air quality impacts on local sensitive receptors would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The Project would not result in activities that create objectionable odors. The Project is a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, and associated parking lot that would not include any activities 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

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14 *The Project's estimated trip generation presented here is based on ITE rates used in CalEEMod.*

15 *DKA Planning 2022, based on City of Los Angeles database of traffic volumes on Ventura Boulevard between Winnetka Avenue and Kelvin Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/VENTURA.BTWN.CHALKHILL.VILLATERAZA.161220-NDSAUTO%20AS.pdf, 2016 traffic counts adjusted by one percent growth factor to represent existing conditions.*

16 *South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

occasional odors associated with the facility. Thus, the Project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, Project impacts related to odors would be 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.[17] Individual projects that generate emissions not 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.

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

IV. BIOLOGICAL RESOURCES

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

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. There are 19 trees on the Project Site, four (4) trees located offsite in the Caltrans ROW north of the Project Site, and four (4) street trees located in the ROW south of the Project Site.[18] The 19 trees on the Project Site would be replaced in accordance with the City's tree replacement requirements. The offsite and ROW trees would be protected in place.[19] Depending on the time of year that the Project Site is developed, nesting birds (which are protected by law) could be using the trees on the Project Site. However, the Project Applicant would be required to comply with the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which limit tree removal to outside of nesting season or pre-construction surveys for nesting birds to ensure that no significant impacts related to nesting birds would occur. Therefore, impacts related to this issue would be less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas and ornamental trees. The Project Site does not contain any riparian habitat or sensitive natural community. Thus, the Project would not 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. Therefore, no impacts related to this issue 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. The Project Site is located in an urbanized area of the City. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas and ornamental trees. The site

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18 *City of Los Angeles Tree Report, Carlberg Associates, June 11, 2022. Refer to Appendix A.*

19 *One of the ROW trees south of the Project Site is dead.*

does not contain any wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board under the Clean Water Act. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas and ornamental trees. The site is not part of a significant wildlife corridor. Additionally, there are no waterways in the Project Site area that are used by migratory fish, and there are no wildlife nursery sites in the area. Depending on the time of year that the Project Site is developed, nesting birds (which are protected by law) could be using the trees on the Project Site. However, the Project Applicant would be required to comply with the MBTA (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which limit tree removal to outside of nesting season or pre-construction surveys for nesting birds to ensure that no significant impacts related to nesting birds would occur. Thus, the Project would not 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, and impacts related to this issue would be less than significant.

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

No Impact. As discussed in response to Checklist Question I(b) (Aesthetics – Scenic Resources), based on the Arborist Report prepared for the Project (refer to Appendix A), there are 19 non-protected, significant trees on the Project Site, four (4) offsite trees located within the Caltrans ROW north of the Project Site, and four (4) street trees located in the ROW south of the Project Site (refer to Table I-1). None of these trees are considered a protected tree as defined by the City.[20] Significant trees are defined by the City as trees having a diameter of eight inches or greater at breast height. The 19 onsite trees would be removed and replaced in accordance with the City's tree replacement requirements for non-protected trees. The offsite and ROW trees would be protected in

[20] *Protected trees and shrubs as defined by the City include oak trees (Quercus spp.) and Southern California black walnut trees (Juglans californica), western sycamore trees (Platanus racemosa), California bay trees (Umbellularia californica), Mexican elderberry shrubs (Sambucus Mexicana), and toyon (Heteromeles arbutifolia).*

place. Compliance with the City's tree replacement requirements would ensure no significant impacts related to trees as scenic resources would occur. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan, because there are no such plans for the Project Site area. Therefore, 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 impacts related to this issue would occur.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The related project is located in a highly urban area and do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area (SEA) or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. As discussed above, the Project would not result in any significant impacts on biological resources. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

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

No Impact. The existing building foundation and the surface parking areas at the Project Site were not identified by Survey LA (the City's official Historic Resources Inventory) as structures that are potentially eligible for listing on the National Register of Historic Places, the California Register of Historic Resources or for designation as a local "Historic Cultural Monument." Moreover, the Project Site is not located within a designated Historic Preservation Overlay Zone (HPOZ) or identified on Survey LA as part of a potential future historic district. Thus, demolition of the existing structures and development of the Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the Project.

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

Less Than Significant With Mitigation Incorporated. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix E), no archaeological sites have been recorded within the Project Site. However, it is possible that unknown archaeological resources could exist at the Project Site, given that significant archaeological resources have been identified in the Los Angeles region. However, the Project would be required to comply with Mitigation Measure ARCHEO-1 (listed below), which would ensure that potential impacts related to unknown archaeological resources would be less than significant.

Mitigation Measures

ARCHEO-1: Inadvertent Discovery of Archaeological Resources

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

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

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

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

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

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

Less Than Significant Impact. No human remains are known to exist at the Project Site. However, in accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning

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

Cumulative Impacts

As discussed above, the Project would not result in impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development that involves ground-disturbing activities is required to implement mitigation similar to or the same as Mitigation Measure ARCHEO-1 listed above for the Project related to the inadvertent discovery of archaeological resources, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

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

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Refer to response to Checklist Question VI(b) below.

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

Less Than Significant Impact. Checklist Questions VI(a) and VI(b) are addressed together, because responses to both questions are linked. This analysis addresses the six criteria outlined in Appendix D of the CEQA Guidelines.

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

Construction

Electricity Demand

Project construction activities would consume relatively minor quantities of electricity to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure. 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 infrastructure on Ventura Boulevard.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific operations and the amount of construction occurring at any given time. Overall,

construction activities associated with the Project would require limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Transportation Energy Demand

As shown in Table VI-1, Project construction would consume approximately 18,894 gallons of gasoline and 72,888 gallons of diesel. Project construction is expected to be completed in 2025.

Table VI-1
Summary of Fuel Use During Project Construction[1]

Fuel Type	Quantity
Gasoline	
On-Road Construction Equipment	18,894 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***18,894 gallons***
Diesel	
On-Road Construction Equipment	50,468 gallons
Off-Road Construction Equipment	22,419 gallons
Total Diesel	***72,888 gallons***
Total Petroleum-Based Fuel	**91,811 gallons**

[1] *Detailed calculations are included in Appendix F.*
[2] *Off-road construction equipment uses diesel fuel.*

Demolition activities are projected to take approximately one month. Heavy-duty construction equipment needed to complete these activities would include diesel-fueled haul trucks, concrete/industrial saw, generator sets, and a rubber tired dozer. The use of haul trucks with double trailers could be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris.

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

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2021 was 23.17 miles per gallon (mpg) for gasoline and 8.3 mpg for

diesel.[21]

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

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other 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, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California.[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 repower of older, dirtier engines with newer emission-controlled models. Implementation began on January 1, 2024, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented in 2024 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

All of the Project's power needs would be accommodated by electricity. No natural gas would be used. Currently, LADWP is able to supply over 8,009 megawatts (MW) of generation capacity with the highest recorded peak being 6,502 MW.[23] Estimated peak

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

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

demand in 2025-2026 (Project buildout year is 2025) is expected to grow to 6,076 MW.[24] Despite these growth projections, demand would still not exceed the existing capacity of 8,009 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that approximately 2,545,064 kWh/yr of electricity would be used per year at the Project Site (refer to Table VI-2). Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines that connect to the Project Site from Ventura Boulevard.

Table VI-2
Estimated Project Electricity Demand

Land Use	Size	Total (kWh/yr)[1]
Self-Storage	156,917 lgsf	2,522,349
Commercial/Retail	1,400 sf	13,939
Surface Parking	22 spaces	8,776
	Total	**2,545,064**

kWh = kilowatt-hours yr = year gsf = gross square feet
sf =square feet

[1] *Calculated via CalEEMod (refer to Appendix D).*

LADWP has confirmed that existing electrical service is available to the Project Site and would be provided to the Project in accordance with LADWP's rules and regulations.[25] LADWP has also confirmed that the Project's estimated electricity requirements are part of the City's total load growth forecast and have been taken into account in the planned growth of the power system.[26]

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP and what exists currently at the Project Site for the existing uses. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also be in compliance with the City's Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[27] Based on the above analysis, a less than significant impact associated with the consumption of electricity would occur.

[24] *2017 Power Strategic Long-Term Resource Plan, December 2017.*

[25] *LADWP, Rodolfo Monroy, District Engineer, Valley Service Planning, correspondence, August 23, 2022. Refer to Appendix E.*

[26] *Ibid.*

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

Transportation Energy Demand

The Project includes the development of a self-storage facility with 1,400 square feet of ground floor retail on an infill site in close proximity to multiple residential neighborhoods, providing a storage solution for nearby residents. By design, the Project would have a low transportation energy demand when compared to other potential by-right uses that could be developed at the site that generate more and longer trips than the Project.

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

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

The availability of electricity is dependent on adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Project would be part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) incorporates the estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs.[28] Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (Project buildout) would be 23,537 gigawatt-hours (GWh) of electricity.[29] As discussed previously, the Project would consume approximately 2,545,064 kWh of electricity annually, representing a small fraction of one percent of LADWP's projected sales for that year. As future projected electricity supplies from LADWP are adequate to serve the Project, Project impacts on local and regional electricity supplies would be less than significant.

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

As discussed above, the Project's demand for electricity supply would be well within the available regional supplies of LADWP and SoCalGas, respectively. The Project's energy demand and consumption would be relatively negligible compared to available supplies. The Project's demand for electricity would have a less than significant impact on the peak

[28] *An update to the Power Strategic Long-Term Resource Plan is currently under way.*

[29] *2017 Power Strategic Long-Term Resource Plan, LADWP, December 2017.*

and base period demands of LADWP and SoCalGas, respectively.

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

The Project would be required to comply with Title 24 requirements, CalGreen requirements, and the City's Green Building Code. Additionally, vehicles used by Project residents would be subject to improving fuel-energy standards, including improved engine combustion and the use of electric vehicles. Thus, the Project would comply with energy standards, and impacts would be less than significant.

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

LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (Project buildout year) would be 23,537 GWh of electricity. As such, the Project's estimated annual usage demand of 2,545,064 kWh would be a small fraction of one percent of LADWP's projected sales for the 2025-2026 fiscal year.

In accordance with Senate Bill 350 (SB 350) (Clean Energy and Pollution Reduction Act), which establishes clean energy, clean air, and GHG emissions reduction goals, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. According to the 2017 SLTRP, LADWP has increased renewable energy percentage from 3 percent to 29 percent from 2003 to 2016. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead.

Overall, the Project would adhere to the required building code standards, such as the current Title 24 standards and the City's Green Building Code, to ensure energy efficiency within the Project building. Compliance with energy standards is expected to result in more efficient use of electricity in future years. As such, the Project would not adversely affect electricity resources, and impacts would be less than significant.

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

Approximately 0.52 billion barrels of oil were supplied to California refineries in 2022.[30] Assuming that oil supplies remain constant, the Project's estimated consumption of approximately 53,280 gallons of gasoline and 14,710 gallons of diesel fuel per year (refer to Appendix F) would be a small fraction of one percent of total fuel supplies. This estimate is conservative since it is assumed that California's future reliance on oil would be reduced

[30] *California Energy Commission, Oil Supply Sources to California Refineries, https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries, January 2023.*

since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles.

As discussed previously, the Project includes the development of a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail, and associated parking lot use on an infill site in close proximity to multiple residential neighborhoods, providing a storage solution for nearby residents. By design, the Project would have a low transportation energy demand when compared to other potential by-right uses that could be developed at the site that generate more and longer trips than the Project. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies and impacts on energy resources would be less than significant.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, impacts related to energy would be less than significant.

Cumulative Impacts

The Project, in conjunction with the related project, could result in a net increased demand for electricity supplies. LADWP's 2017 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per the Clean Energy and Pollution Reduction Act (SB 350), which has an adopted goal of achieving 50 percent renewable energy sources by 2030.

Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Additionally, as discussed above, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the

available off-site renewable sources of energy that could meet the Project's and related projects energy demand. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Transportation Energy

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

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Responses to the Checklist Questions in this section are based primarily on the following (refer to Appendix G):

- *Geotechnical Investigation, Langan Engineering and Environmental Services, Inc., June 7, 2022.*

- *Paleontological Resources for the Proposed 20401 Ventura Boulevard Project, Natural History Museum of Los Angeles County, September 7, 2016.*

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

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

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site. The fault closest to the Project Site is the Malibu Coast fault, located approximately 12 kilometers fromthe Project Site. 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 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 on the Project Site. Therefore, no impacts related to this issue would occur.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. The fault closest to the Project Site is the Malibu Coast Fault located approximate 12 kilometers from the Project Site. However, the Project Applicant would be required to design and construct the Project in accordance with the City's Building Code and applicable recommendations made in the Geotechnical Investigation Report prepared for the Project and any future updates to the report. Compliance with these would ensure that potential impacts related to seismic groundshaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. Based on the California Geological Survey (CGS) Seismic Hazard Evaluation of the Canoga Park 7.5-Minute Quadrangle, the Project Site is not located within a

liquefaction hazard zone. Other than a minor zone of perched water observed in Boring B-1 taken at the Project Site, groundwater was not observed to the maximum depth explored of approximately 66 feet. Bedrock was observed near the ground surface. The potential for liquefaction at the Project Site is considered to be negligible. Therefore, no impacts related to liquefaction would occur as a result of the Project.

iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Site is located in an earthquake-induced landslide zone per the CGS Seismic Hazard Zones map for the Canoga Park Quadrangle. Landslides are not mapped near the Project Site on regional geologic maps of the area and evidence of a deep-seated landslide was not observed during recent and/or the prior site reconnaissance and/or exploration borings conducted at the Project Site. Recent slope stability analysis performed for the Project Site indicates that the potential for a seismically-induced landslide is very low. Nonetheless, the Project Applicant would be required to design and construct the Project in accordance with the City's Building Code and applicable recommendations made in the Geotechnical Investigation Report prepared for the Project and any future updates to the report. Compliance with these would ensure that potential impacts related to landslides would be less than significant.

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

Less Than Significant Impact. During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance

with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, no significant impacts related to erosion would occur as a result of Project operation.

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

Less Than Significant Impact. Regarding geologic/soil instability, as discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Seismic Related Ground Failure), based on the CGS) Seismic Hazard Evaluation of the Canoga Park 7.5-Minute Quadrangle, the Project Site is not located within a liquefaction hazard zone. Other than a minor zone of perched water observed in Boring B-1 taken at the Project Site, groundwater was not observed to the maximum depth explored of approximately 66 feet. Bedrock was observed near the ground surface. The potential for liquefaction at the Project Site is considered to be negligible. Therefore, no impacts related to liquefaction would occur as a result of the Project.

Regarding landslides, as discussed in response to Checklist Question VII(a)(iv) (Geology and Soils – Landslides), the Project Site is located in an earthquake-induced landslide zone per the CGS Seismic Hazard Zones map for the Canoga Park Quadrangle. Landslides are not mapped near the Project Site on regional geologic maps of the area and evidence of a deep-seated landslide was not observed during recent and/or the prior site reconnaissance and/or exploration borings conducted at the Project Site. Recent slope stability analysis performed for the Project Site indicates that the potential for a seismically-induced landslide is very low. Nonetheless, the Project Applicant would be required to design and construct the Project in accordance with the City's Building Code and applicable recommendations made in the Geotechnical Investigation Report prepared for the Project and any future updates to the report. Compliance with these would ensure that potential impacts related to landslides would be less than significant.

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

Less Than Significant Impact. Expansion index testing performed as part of the Geotechnical Investigation Report indicates that near-surface engineered fill soils have a low expansion potential. However, data available from consolidation testing performed on the on-site bedrock materials indicate the on-site bedrock may expand with increased moisture content. However, the Project Applicant would be required to design and construct the Project in accordance with the City's Building Code and applicable recommendations made in the Geotechnical Investigation Report prepared for the Project

and any future updates to the report. Compliance with these would ensure that potential impacts related to expansive soils would be less than significant.

e) Would the project 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 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.

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

Less Than Significant With Mitigation Incorporated. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and is currently developed with surface parking areas and the foundation of a previous restaurant building. According to a records search conducted by the Los Angeles County Museum of Natural History, there are no known paleontological resources present within the Project Site boundaries, although there are known resources within the general Project Site area. Although the Project Site has been developed and redeveloped over the decades, disturbing the soil at the site, and no paleontological resources are known to exist at the site, it is possible that unknown paleontological resources could exist at the site and could be encountered during the Project's grading and excavation phases. However, implementation of Mitigation Measure PALEO-1 would ensure the protection of any resources encountered, and Project impacts related to paleontological resources would be less than significant.

Mitigation Measures

PALEO-1 If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Further, all development in the City (including the Project and the related projects) that involves ground-disturbing activities is required to consider potential impacts on paleontological resources and identify mitigation measures where applicable (similar to Mitigation Measure PALEO-1 identified for the Project). Therefore, cumulative geotechnical impacts related would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

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

- *Greenhouse Gas Emissions Technical Report, DKA Planning, January 2023.*

Environmental Setting

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

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHG emissions, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 1.5 times between 1990 and 2008. In addition, in the Global Carbon Budget 2014 report, published in September 2014, atmospheric CO_2 concentrations in 2013 were found to be 43 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years. Global increases in CO2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. With regard to emissions of non-CO_2 GHG, these have also increased significantly since 1990. In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global GHG emissions must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.

With regard to the adverse effects of global warming, as reported by SCAG, "Global warming poses a serious threat to the economic well-being, public health, and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. Southern California, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem."

GHG Emissions Background. GHG emissions include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). CO_2 is the most abundant GHG. Other GHG emissions are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHG emissions are frequently expressed in the equivalent mass of CO_2, denoted as

CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHG emissions is provided in Table VIII-1.

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, racecars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
	atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high-energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHG emissions identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties used to estimate the potential future impacts of emissions of different gases on the climate system. The GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. A summary of the atmospheric lifetime and GWP of selected gases is presented in Table VIII-2. As indicated in the table, the GWP ranges from 1 to 22,800.

Table VIII-2
Atmospheric Lifetimes and Global Warming Potential

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12 (+/-3)	25
Nitrous Oxide (N_2O)	114	298
HFC-23: Fluoroform (CHF_3)	270	14,800
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390
PFC-116: Hexafluoromethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800
Nitrogen Trifluoride (NF_3)	740	17,200
Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials		

Projected Impacts of Global Warming in California. The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's Fifth Assessment Report, Summary for Policy Makers states that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forces together." A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.

According to CARB, the potential impacts in California due to global climate change may include: loss in snowpack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation. Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the California Climate Adaptation Strategy as a response to the Governor's Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the California Climate Adaptation Strategy, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers. The website, known as Cal-Adapt, became operational in 2011. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the City in which the Project Site is located could result in an average increase in temperature of approximately 5.4 to 8.0°F by 2070–2099, compared to the baseline 1961–1990 period.

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge. However, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of

future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows. In its Fifth Assessment Report, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea-level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus, affect their quality.

Ecosystems and Wildlife. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.

Regulatory Framework

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHG emissions into the atmosphere.

Federal

Federal Clean Air Act. The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the federal CAA, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid acting if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHG emissions contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171. The USEPA stated that high atmospheric levels of GHG emissions "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010. While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On April 4, 2012, the USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil–fuel–fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO_2 per MW-hour (CO_2/MWh) on an average annual basis, subject to certain exceptions. Subsequently, on April 23, 2018, the USEPA issued a policy stating that CO_2 emissions from biomass-fired and other biogenic sources would be considered carbon neutral when used for energy production at stationary sources.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.

Corporate Average Fuel Economy (CAFE) Standards. In response to the Massachusetts v. Environmental Protection Agency ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. In March 2020, NHTSA and USEPA adopted new less stringent standards covering model years 2021 through 2026.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

Building on the success of the first phase of standards, in August 2016, the USEPA and the NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards were to lower CO_2 emissions by approximately 1.1 billion metric tons and save vehicle owners fuel costs of about $170 billion. On August 10, 2021, NHTA proposed new CAFE standards for 2024-2026 that would increase the stringency of standards by 8 percent per year rather than the previous 1.5 percent.

On September 19, 2019, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and USEPA issued a final action entitled the "One National Program Rules" to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas (GHG) emission standards for automobile and light duty trucks. This action finalizes the Safe Affordable Fuel Efficient (SAFE) Vehicles Rule and clarifies that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. The SAFE Vehicle Rule also withdraws

the CAA waiver granted to the State of California that allowed the state to enforce its own Low Emission Vehicle program. On March 31, 2020, Part II of the SAFE Vehicles was issued and sets carbon dioxide emissions and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. On April 22, 2021, NHTA proposed to repeal the SAFE I Rule, which was finalized in 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[31] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[32] On December 21, 2021, the NHTA repealed the SAFE I Rule.

Energy Independence and Security Act. The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;

- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;

- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and

- While superseded by the USEPA and the NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

State

Executive Order S-3-05. Issued by Governor Schwarzenegger in June 2005, this executive order established GHG emissions targets for the state, as well as a process to ensure the targets are met. The order directed the Secretary of the California

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31 *United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.*

32 *United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.*

Environmental Protection Agency (CalEPA) to report every two years on the state's progress toward meeting the Governor's GHG emission reduction targets. The statewide GHG emissions reduction targets are as follows:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 emission levels;
- By 2030, reduce to 40 percent below 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

The State Legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32) and Senate Bill 32, respectively, both of which are discussed below. However, the Legislature has not yet adopted a target for the 2050 horizon year.

As a result of Executive Order S-3-05, the California CAT, led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from several state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order. The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and services.[33]

Executive Order B-30-15. Issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.[34]

Executive Order B-55-18. Issued by Governor Jerry Brown in September 2018, this establishes a statewide goal to achieve carbon neutrality as soon as possible, but no later

[33] *CalEPA, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 58.*

[34] *California Air Resources Board, Frequently Asked Questions about Executive Order B-30-15, 2030 Carbon Target and Adaptation FAQs, April 29, 2015.*

than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Executive Order S-1-07 (California Low Carbon Fuel Standard). Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS were directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan. The LCFS program was re-adopted in 2015 and will continue to complement other AB 32 measures, transform, and diversify the fuel pool, and is a key part of the State's petroleum reduction goals for 2030.

California Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32. The California Global Warming Solutions Act of 2006 (also known as AB 32) commits the state to achieve the following:

- By 2010, reduce to 2000 GHG emission levels
- By 2020, reduce to 1990 levels

To achieve these goals, which are consistent with the California CAT GHG emissions reduction targets for 2010 and 2020, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.[35]

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (Global Warming Solutions Act) to include an emissions reductions goal for 2030. Specifically, SB 32 requires the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves 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.

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35 *CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are: (1) a low- carbon fuel standard, which reduces carbon intensity in fuels statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.*

Assembly Bill 197. Assembly Bill (AB) 197, signed September 8, 2016, is a bill linked to SB 32 that prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its Internet Web site the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the state's programs, policies, and investments related to climate change.

Senate Bill 350. Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 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.[36]

Senate Bill 1368. Senate Bill (SB) 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO_2 per MWh (see CEC Order No. 07-523-7).

Assembly Bill 1493 (Pavley I). Assembly Bill (AB) 1493, passed in 2002, requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG emissions from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these "Pavley" regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016.[37] Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-

[36] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.*

[37] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/cc/ccms/ccms.htm, accessed April 2020.*

specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year.[38] California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 45-percent GHG reduction in comparison to the 2009 model year.

Senate Bill 97. SB 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires the Office of Planning and Research (OPR) to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted on December 30, 2009 and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments.[39] The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

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.[40]

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38 *California Air Resources Board, "Comparison of Greenhouse Gas Reductions for all Fifty United States under CAFE Standards and ARB Regulations Adopted Pursuant to AB 1493", January 23, 2008.*

39 *See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHG emissions).*

40 *14 Cal. Code Regs. § 15064.4(b).*

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."[41]

In December 2018, the Governor's Office of Planning and Research (OPR) released a CEQA and Climate Change Advisory (Discussion Draft) updates the 2009 guidance for project-level analyses. It reaffirms the discretion that lead agencies have in establishing an appropriate methodology and determining significance.

Senate Bill 743. This 2013 legislation updates the way transportation impacts are measured in California, focusing on vehicle miles traveled (VMT) rather than level of service as the main measure of transportation impacts. It calls on decision-makers throughout the state to focus on reducing overall VMT and the GHG emissions from such vehicle activity. Traffic studies in the City began formally analyzing projects in this fashion effective July 1, 2020.

Senate Bill 375. Acknowledging the relationship between land use planning and transportation sector GHG emissions, Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each MPO would be required to adopt an SCS to encourage compact development that reduces passenger VMT and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

Assembly Bill 1279. This 2022 legislation creates a legally binding goal that California achieve carbon neutrality by 2045. It would also require the State to reduce GHG emissions by 85 percent below 1990 levels by 2045.

Climate Change Scoping Plan.

The Climate Change Scoping Plan is a GHG emissions 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 sectors to reduce GHG emissions and reach the state's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a

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

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

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 carbon neutrality and GHG emissions reduction targets for 2045 incorporated into the Scoping Plan.

Achieving the targets described in the 2022 Scoping Plan Update 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 Update is critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG emissions 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 Zero-Emissions Vehicle (ZEV) infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment – the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the Green New Deal and Green Building Code. Each of these is discussed further below.

Cap-and-Trade Program. The original Climate Change Scoping Plan identified a cap-and-trade program as one of the strategies for California 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 can trade permits to emit GHG emissions within the overall limit.

The Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities"). "Covered entities" subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender an allowance for each metric ton CO_2e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2030 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*

For example, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a commensurate reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2030 GHG emissions reduction mandate.

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.*[42]

Overall, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures. The Cap-and-Trade Program covered approximately 450 businesses responsible for about 85 percent of California's GHG emissions.

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[42] *California Air Resources Board, First Update, May 2014, p. 88.*

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program.

Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

California Renewables Portfolio Standard. The California RPS program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with SCE's commitment to increase its renewables portfolio over time.

Advanced Clean Cars Regulations. In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2015–2025. The components of the Advance Clean Car program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.

On September 23, 2020, Governor Gavin Newsom signed Executive Order No. N-79-20 that phases out sales of new gas-powered passenger cars by 2035 in California with an additional ten-year transition period for heavy vehicles. The state would not restrict used

car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

In November 2022, the ACC II regulations took effect, setting annual ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly more stringent exhaust and evaporative emission standards (LEV program) to ensure automakers phase out new sales of internal combustion engine vehicles.

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608). The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

California Building Energy Efficiency Standards (Title 24, Part 6). California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The standards continue to improve on the standards for new construction of, and additions and alterations to, residential and non-residential buildings and became effective January 1, 2023. Key changes included encouraging heat pump technology for space and water heating, setting electric-ready requirements for single-family homes, expanding solar photovoltaic system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. Compliance with Title 24 is enforced through the building permit process.

California Green Building Standards (CALGreen Code). The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are mandatory green building standards for new structures. They focus on measures to reduce water consumption, GHG emissions, and materials and waste. These codes are updated every three years, with the 2022 CalGreen code updates effective January 1, 2023. New requirements address requirements for Level 2 electric vehicle chargers and use of solar photovoltaic shade structures instead of shade trees. Voluntary measures focus on higher EV charging requirements for parking facilities.

South Coast Air Quality Management District. The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air

Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

Regional

Southern California Association of Governments. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS on September 3, 2020, calling for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated RTP/SCS calls for several land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve climate change objectives:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

- Locating 15 percent more jobs in HQTAs

The 2020-2045 RTP/SCS calls for a 19 percent reduction in per capita GHG emissions by 2035 from 2005 levels. This is intended to be consistent with CARB's performance targets during this same period. The bulk of these reductions are to come from transportation investments, pricing strategies, TDM strategies, and land use programs. On October 30, 2020, CARB accepted the RTP/SCS quantification of GHG emissions on October 30, 2020 (Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination).

Local

City of Los Angeles Green Building Code. On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the LAMC, referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2010 CALGreen Code. On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. The 2020 Los Angeles Green Building Code incorporates by reference the mandatory requirements of the 2019 California Green Building Standards Code.

City of Los Angeles Green New Deal. The April 2019 Green New Deal is designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives. It was 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 the climate emergency with accelerated targets and new aggressive goals.

While not solely focused on climate change, reduction of GHG emissions is one of eight benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- 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 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/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; and 75 percent by 2035.

- 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-emissions 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 lbs. of waste generated per capita per day in 2011).

- Eliminate organic waste going to landfill by 2028.

- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025 and 3 degrees by 2035.

- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025, 75 percent by 2035, and 100 percent by 2050.

Traffic Study Policies and Procedures. LADOT has developed TAG to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation impact study. The TAG is consistent with the City's goals to emphasize the importance of sustainability, smart growth, and reduction of GHG emissions in addition to traditional traffic flow considerations when evaluating and mitigating impacts to the transportation system because of land use policy decisions. The TAG prioritizes transportation demand management strategies and multi-modal strategies over automobile-centric solutions when mitigating project-related impacts on the City's transportation system. Through acknowledgement of an imminent update that will identify VMT reduction thresholds, the TAG stands as an implementing mechanism of the City's strategy to conform to the mandates and requirements of AB 32, SB 375, and SB 743.

Existing Conditions

Existing Statewide GHG Emissions. GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and

cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal), have contributed to the rapid increase in atmospheric levels of GHG emissions over the last 150 years.

As reported by the CEC, California contributes approximately one percent of global and 8.2 percent of national GHG emissions.[43] California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO_2 produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from 2000 through 2019.[44] It includes estimates for CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. The GHG inventory for California for 2010 through 2019 is presented in Table VIII-3. As shown therein, the GHG inventory for California in 2019 was 418.2 million $MTCO_2e$.

Table VIII-3
California GHG Emissions Inventory
(metric tons of carbon dioxide equivalent [$MTCO_2e$])

Source	2013	2014	2015	2016	2017	2018	2019
Transportation	161.2	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Industrial	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Commercial & Residential	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Agriculture	161.2	162.6	166.2	169.8	171.2	169.6	166.1
High GWP	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Recycling & Waste	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Total	**447.5**	**443.0**	**440.7**	**429.1**	**424.6**	**425.1**	**418.2**

Source: California Air Resources Board (2021). California Greenhouse Gas Emission Inventory - 2021 Edition. Data available at: www2.arb.ca.gov/ghg-inventory-data.

Existing Project Site Emissions. The Project Site is currently vacant and contains a foundation remnant of a previous 10,850-square-foot restaurant building and asphalt/concrete parking areas. As such, there are no anthropogenic emissions of GHG emissions that are generated at the Project Site.

43 *California Energy Commission, Tracking Progress, Greenhouse Gas Emission Reductions. https://www.energy.ca.gov/data-reports/tracking-progress. Accessed April 2020.*

44 *A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.*

Project Impact Analysis

Methodology and Threshold of Significance

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 a 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 GHG emissions).

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, SCAQMD, OPR, CARB, CAPCOA, or 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 impacts. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-emissions-related impacts on the environment.

For information purposes and as required by CEQA, the analysis also calculates 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 State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project. CEQA Guidelines Section 15064.4(a) assist lead agencies in determining the significance of the impacts of GHG emissions, giving them the discretion to determine whether to assess impacts quantitatively or qualitatively. It calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and

over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The City, SCAQMD, Office of Planning and Research (OPR), California Air Resources Board (CARB), California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a 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 is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment.

The analysis also calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations requirements adopted to implement plans for reducing or mitigating GHG emissions. However, the significance of the Project's GHG emissions is not based on the amount of emissions from the Project.

Consistency with Applicable Plans and Policies

The Project's GHG emissions impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG emissions reduction strategies. The Project has been evaluated later in this section for consistency with the Climate Change Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's 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 2008 Climate Change Scoping Plan and subsequent updates provide measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020–2045 RTP/SCS contains measures to achieve VMT 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 and this analysis addresses consistency with these strategies and goals. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less-than-significant impact, because the Project would be consistent with the overarching state regulations on GHG emissions reduction (i.e., AB 32, SB 32, AB 100, AB 1493, and SB 375). A consistency analysis is provided and describes the Project's compliance with or conflict with

performance-based standards included in the regulations outlined in the applicable portions of the Climate Change Scoping Plan, 2020– 2045 RTP/SCS, and the City's Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build 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 the California Environmental Quality Act (CEQA)."

The state encourages local governments to adopt a CEQA-qualified climate action plan (CAP) addressing the three priority areas, including transportation electrification, VMT reduction, and building decarbonization. However, as not all jurisdictions have sufficient resources (e.g., technical expertise, staffing, funding, etc.) to do so, 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 should also look to the three priority areas when developing local climate plans, measures, policies, and actions. "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 Scoping Plan that each community or local area has distinctive situations, and local jurisdictions must balance the need for housing while demonstrating that a project is in alignment with the state's climate goals. 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.A consistency analysis has been provided that describes the Project's conflict with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of CARB's *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS. In addition, this analysis assesses the Project's consistency with other plans (e.g., the Green New Deal/Sustainable City pLAn) for informational purposes.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform project analyses. Statewide, the Climate Change Scoping Plan provide measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reduction required by SB 375. The City does not have a programmatic mitigation plan from which to tier from, though it has adopted plans to help reduce GHG emissions.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this chapter estimates reductions of project-related GHG emissions resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future.

A consistency analysis is provided below that describes the Project's consistency with performance-based standards in the applicable parts of CARB's *Climate Change Scoping Plan,* SCAG's 2020-2045 RTP/SCS, and the Green New Deal/Sustainable City pLAn.

Quantification of Emissions

In view of the above considerations, the City has determined to quantify the Project's total annual GHG emissions, taking into account the regulatory GHG emission reduction measures that would be incorporated into the Project's design as required by the City.

This analysis quantifies the Project's annual GHG emissions and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB 32 and SB 78 The Project without Reduction Features scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code. This comparison is being done for informational purposes only, including disclosing the relative carbon efficiency of the Project. The City, as lead agency, is basing its determination of the significance of the Project's GHG emissions in relation to the Project's location and design and its consistency with state, regional, and City regulatory schemes.

Project GHG Emissions

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[45] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[46] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this section is consistent with the General Reporting Protocol's reporting requirements.

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45 *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009.*

46 *Ibid.*

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, onsite combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, offsite emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[47]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[48] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[49] Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the 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 an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHG emissions that would exist if the project were not implemented. The analysis of the

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47 *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

48 *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.*

49 *OPR Technical Advisory, p. 5.*

Project's GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

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, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[50]

Construction

The Project's construction emissions were calculated using CalEEMod Version 2022.1.1.5. Details of the modeling assumptions and emission factors are provided in Appendix H. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[51] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

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50 California Air Pollution Control Officers Association, California Emissions Estimator Model, CalEEMod™, www.caleemod.com, accessed May 25, 2016.

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

Operation

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new employee and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2021 model and also takes into account actions and mandates expected to be in force in 2024 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile

source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips as a result of project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2024 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

There are no GHG emissions thresholds adopted by the SCAQMD that are applicable to the Project. In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. Within its October 2008 document, 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, such commercial and residential projects would have been assumed to have a less than significant impact on climate change. However, this proposed screening threshold was not adopted by the SCAQMD.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the Green New Deal/Sustainable City pLAn.

As part of the *Climate Change Scoping Plan*, a statewide emissions inventory was developed as required by AB 32 which directs CARB to develop and track GHG emissions reductions to document progress towards the state GHG target. The emissions inventory also takes into account GHG emissions reduction measures developed by CARB to achieve state targets. Consistency with the *Climate Change Scoping Plan* is evaluated by comparing the Project's GHG reduction measures to those contained in the Scoping Plan.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this chapter estimates reductions of project-related GHG emissions resulting from consistency with plans.

Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future.

While there are many ways to quantify the efficiency of the GHG reduction measures provided for in the plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the Project Without Reduction Features scenario. This approach is consistent with the concepts used in CARB's 2022 Climate Change Scoping Plan. This methodology is used to analyze consistency with applicable GHG emissions reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under a Project Without Reduction Features scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2024. Early-action measures identified in the Climate Change Scoping Plan that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out. The Project Without Reduction Features scenario is used to establish a comparison with project-generated GHG emissions. The Project Without Reduction Features scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a Project Without Reduction Features scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proximity to public transportation.

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

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

Less Than Significant Impact. Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Project Emissions

In support of the consistency analysis below that describes the Project's compliance with, or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, the City's General Plan Air Quality Element, and the Green New Deal/Sustainable City pLAn, quantitative calculations are provided below.

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the remnant restaurant building foundation and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

Project construction is anticipated to be completed in 2025 with occupancy the same year. The GHG emissions associated with construction of the Project were calculated for each year of construction activity. Construction of the Project is estimated to generate a total of 1,103 $MTCO_2e$ (refer to Table VIII-4). As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[52] This results in annual Project construction emissions of 37 $MTCO_2e$.

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

Table VIII-4
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	341
2024	623
2025	139
Total	**1,103**
Amortized Over 30 Years	***37***

[a] *CO_2e was calculated using CalEEMod version 2022.1.1.5 Refer to Appendix H.*

Source: DKA Planning, 2023.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in Table VIII-5, the Project would result in three $MTCO_2e$ per year from area sources.

Table VIII-5
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	3
Energy[c] (electricity and natural gas)	970
Mobile	496
Solid Waste[d]	62
Water/Wastewater[e]	129
Refrigerants	7
Construction	37
Total Emissions	**1,704**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Appendix H.*
[b] *Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2023. Refer to Appendix H.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for LADWP were selected in CalEEMod. The carbon intensity (pounds per megawatt an hour [lbs/MWh]) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

The 2022 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water hating, lighting, and insulation for attics and walls.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.[53] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-5, Project GHG emissions from electricity and natural gas usage would result in a total of 970 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the square footage for the proposed 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaceswere multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE) *Trip Generation, 10th Edition*.

The Project represents an infill development within an urbanized area that would concentrate self-storage uses within an HQTA.[54] The Project Site is located along the dense Ventura Boulevard corridor with proximity to Metro local bus services (lines 162, 243, and 244). The Project would provide bicycle storage areas for Project employees and visitors. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying*

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53 *California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

54 *The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Also refer to the City's ZIMAS*

Greenhouse Gas Mitigation Measures, which provides emission reduction values for transportation related design techniques.[55] These techniques would reduce vehicle trips and VMT associated with the Project relative to the standard ITE trip generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.

- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The Project would reduce VMT by developing neighborhood-serving self-storage and retail uses that support local residences and commercial use.

- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is located along the dense Ventura Boulevard corridor, a regional job center, and adjacent to dense residential neighborhoods. Development of the self-storage facility in close proximity to residential uses would allow residents to access the facility on their way to/from home/work/shopping, thereby reducing VMT and associated GHG emissions.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table VIII-5, the Project GHG emissions from mobile sources would result in a total of 496 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (i.e., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-5, the Project scenario is expected to result in a total of 62 $MTCO_2e$ per year from solid waste.[56]

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55 *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

56 *AB 341 (2012) increased the Statewide waste diversion goal from 50 to 75 percent from baseline rates established by CalRecycle by 2020 and beyond. Further, SB 1383 (2016) requires jurisdictions to reduce 75 percent of organic waste disposal in landfills by 2030.*

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[57] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2022 California Plumbing Code (which is based on the 2021 Uniform Plumbing Code), 2022 CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

LADWP's programs include programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2022 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its Landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035.

As shown in Table VIII-5, Project GHG emissions from water/wastewater usage would result in a total of 129 $MTCO_2e$ per year.

Combined Construction and Operational Emissions

As shown in Table VIII-5, when taking into consideration implementation of project design features, including the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 37 $MTCO_2e$ annually (as amortized over 30 years) during construction.

[57] *The intensity factor reflects the average pounds of CO_2e per megawatt generated by a utility company.*

Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, one approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a Project Without Reduction Features comparison. The analysis in this section includes potential emissions under a Project Without Reduction Features scenario and from the Project at build-out based on actions and mandates in force in 2025.

As shown in Table VIII-6, the emissions for the Project and its 1,704 and 2,617 $MTCO_2e$ per year, respectively, that shows the Project would reduce emissions by 34.9 percent from CARB's 2024 Project Without Reduction Features scenario.

Table VIII-6
Estimated Reduction of Project-Related GHG Emissions
Resulting from Consistency with Plans

Scenario and Source	Project Without Reduction Features Scenario*	As Proposed Scenario	Reduction from Project Without Reduction Features Scenario	Change from Project Without Reduction Features Scenario
Area Sources	3	3	-	0%
Energy Sources	1,672	970	-702	-42%
Mobile Sources	707	496	-211	-30%
Waste Sources	62	62	-	0%
Water Sources	129	129	-	0%
Refrigerants	7	7	-	0%
Construction	37	37	-	0%
Total	**2,617**	**1,704**	**-913**	**-34.9%**

Daily construction emissions amortized over a 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over the duration of activities and dividing by the construction period.

** Project Without Reduction Features scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2023. Refer to Appendix H.

Consistency with Applicable Plans and Policies

The discussion below describes the extent to which the Project is consistent with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS, each of which identifies GHG emissions-reducing measures that directly and indirectly apply to the Project. This analysis also evaluates the Project's consistency with City plans and programs that generally address climate change. As shown herein, the Project would be consistent with the applicable GHG emissions-reduction plans and policies.

Statewide: Climate Change Scoping Plan

As discussed above, jurisdictions that want 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 should also look to the three priority areas. To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG emissions reduction strategies that can be implemented by local governments within the three priority areas (transportation electrification, VMT reduction, and building decarbonization).[58] A detailed assessment of goals, plans, policies implemented by the City that would support the GHG emissions reduction strategies in the three priority areas is provided below.

Transportation Electrification

The priority GHG emissions reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035.

- Convert local government fleets to 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 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 will follow a "zero emission first" policy for City fleets. The Green New Deal also establishes

58 *Table 1 of Appendix D 2022 Scoping Plan Update, November 2022.*

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 the adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City will be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would include four (4) EV-ready parking spaces, which would support zero-emissions vehicles in general.

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

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 California'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 walking. 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. However, the Project would include reconstruction of the sidewalk along the Project Site's frontage on Ventura Boulevard that would contribute to the City's goal of encouraging the use of alternative modes of transportation. Therefore, the Project would not conflict with the implementation 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, micro-transit, 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 the implementation of SB 375 which requires integration of planning processes for transportation, land use and housing and generally encourages jobs/housing proximity, promotes transit-oriented development (TOD), 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. The 2020–2045 RTP/SCS' "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. Refer to Table 5 below for additional discussion of the Project's consistency with the 2020-2045 RTP/SCS.

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. 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.

The Project represents development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the 2020-2045 RTP/SCS. The Project's proximity to existing residential neighborhoods and sources of employment and shopping would allow for reduced VMT and associated GHG emissions, given that users of the proposed self-storage facility would only have to drive a short distance to the facility and/or could stop by the facility on the way to/from work/shopping. Therefore, the Project would be consistent with these reduction strategies.

Building Decarbonization

The priority GHG emission reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026.

- 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 our electric supply becomes 100 percent carbon-free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but

implementation does not depend (directly, at least) on how buildings are designed and built.

The City has adopted an All-Electric Buildings Ordinance effective April 1, 2023, that will reduce GHG emissions related to natural gas combustion. Under this ordinance, all building permit applications for newly constructed buildings are required to be all-electric with some exceptions such as cooking within restaurant uses. Space heating, water heating, and cooking for non-restaurant uses are required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the All-Electric ordinance 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 All-Electric ordinance. Therefore, the Project would be consistent and not conflict with the City's adopted All-Electric Ordinance.

- 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 the 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 the LADWP's Consumer Rebate Program (CRP), 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 usage and associated GHG emissions.

The Project would not involve retrofit of existing buildings and would be completely new construction. However, the Project would incorporate modern HVAC equipment, which has increasing lower GHG emissions, and energy-saving technologies and appliances. Therefore, the Project would be consistent and not conflict with policies to implement energy efficiency retrofits. ***Regional: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy***

Table VIII-7 provides a discussion of the Project's consistency with GHG-related objectives of the 2020-2045 RTP/SCS.

Table VIII-7
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis
Increase percent of the region's total employment growth occurring within HQTAs.	**Consistent.** The Project is an infill development that would create more service-related jobs, consistent with the 2020-2045 RTP/SCS policies and would focus on job growth on Ventura Boulevard (an HQTA).
Decrease daily vehicle miles driven per person.	**Consistent.** The Project is consistent with this objective due to the nature of the Project as an infill development on Ventura Boulevard and in close proximity to dense residential uses, supporting residential growth and reducing associated VMT.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	**Consistent.** The Project is an infill development that would provide a self-storage and neighborhood-serving retail uses for residents in the surrounding area, minimizing PM peak-hour trips and travel distance and duration.
Decrease average travel time to work (all modes).	**Consistent.** The Project is an infill development in the dense Ventura Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its heavy transit and active transportation mode share given its location along the Ventura Boulevard corridor. Because the Project's location will attract travel to and from the Ventura Boulevard corridor and local community, average travel time to work should be reduced when compared to an urban sprawl location.
Increase percentage of trips using either walking or biking (by trip type).	**Consistent.** The Project is an infill development located on the Ventura Boulevard corridor and in proximately to existing residential uses and sources of employment and shopping. The Project includes reconstruction of the sidewalk along the Project Site frontage on Ventura Boulevard that would allow for improved pedestrian access to the Project. Also, the Project would include 16 short-term bicycle parking spaces and 24 long-term bicycle parking spaces, which would allow employees and patrons to have the option of using cycling as a form of transportation to/from the Project.
Reduce per capita GHG emissions (from 2005 levels).	**Consistent.** Since 2005, the City has implemented several changes to the City's Green Building Code to comply with the various Assembly Bills that have been passed by the state to reduce GHG emissions. The Project would comply with the City's Green Building Code, and thus would reduce GHG emissions from 2005 levels.

Table VIII-7
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis
Source: DKA Planning, 2023.	

Local: City of Los Angeles General Plan Air Quality Element

The Project would be consistent with the City's General Plan, specifically its 1989 Air Quality Element. While this Element did not explicitly address control of greenhouse gases, global climate change, or resiliency objectives, it did identify several goals focused on criteria pollutant emissions that would be effective in reducing carbon-based emissions that contribute to climate change. Table VIII-8 summarizes the Project's general consistency with this policy document.

Table VIII-8
Consistency with the City of Los Angeles Air Quality Element

Goal	Consistency Analysis
Good air quality and mobility in an environment of continued population growth and healthy economy.	**Consistent.** The Project is an infill development located along the dense Ventura Boulevard corridor that would accommodate resident and commercial business needs by providing a local self-storage facility with neighborhood-serving retail while minimizing congestion impacts and related pollutant emissions on the region because of the site's proximity to public transit and density of residential population.
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.** The Project is an infill development along the dense Ventura Boulevard corridor that would be consistent with the Element's focus on growing near transit facilities. As discussed under Checklist Topic 3 (Air Quality), the Project would not generate pollutant emissions in excess of SCAQMD's significance thresholds, and not significant air quality impacts would occur.
Source: DKA Planning, 2023.	

Local: City of Los Angeles Green New Deal/Sustainability pLAn

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through 2035 in various topic areas, including: water, solar

power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[59]

The Green New Deal, a 2019 mayoral initiative that updates the Sustainable City pLAn, includes both short-term and long-term aspirations through 2035 for water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[60] Targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero emission vehicles by 2050.

Although the Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would benefit from local access to Metro bus service (lines 162, 243, and 244). Further, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for employees and visitors. Therefore, the Project would be consistent with the Green New Deal, and impacts would be less than significant.

Post-2030 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[61] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. After the findings of these studies, SB 32 was passed on September 8, 2016, and would require

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59 *City of Los Angeles, Sustainable City pLAn, 2019.*

60 *City of Los Angeles, Green New Deal, 2019.*

61 *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.*

the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves 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.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the Project would be consistent with the Actions and Strategies set forth in the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS.

Conclusion

Given the Project's consistency with state, SCAG, and City GHG emissions reduction goals and objectives, the Project is consistent with applicable plans, policies, and regulations 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 incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

Cumulative Impacts

The analysis of the Project's GHG emissions impacts above is a cumulative impact analysis. As concluded there, the Project's contribution to GHG emissions impacts would not be cumulatively considerable.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

The information and analysis provided below are primarily based on the following document (refer to Appendix I):

- *Phase I Environmental Site Assessment, GeoEngineers, April 20, 2022.*
- *Revised Phase I Environmental Site Assessment, 20401 Ventura Boulevard, Woodland Hills, California, July 7, 2023.*

- *Memorandum, 20401 Ventura Boulevard, Woodland Hills, California, September 5, 2023.*

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

Less Than Significant Impact. During the Project's construction phase, the types of hazardous materials that could be used would be typical materials necessary for construction of a commercial development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be conducted in accordance with all applicable federal, state, and local regulations governing such activities.

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

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No Impact. A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project by GeoEngineers, dated April 20, 2020. The purpose of the Phase I ESA was to determine if there are any recognized environmental concerns (RECs) associated with the Project Site.[62] The Phase I ESA included a site reconnaissance, review of current and historical data describing development of the Project Site, and an environmental records search. GeoEngineers concluded that there are no RECs associated with the Project Site. For these reasons, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, no impacts related to this issue would occur as a result of the Project.

62 *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

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

Less Than Significant Impact. The Kol Tikvah Preschool is located within 0.25 miles of the Project Site. The Taft Charter High School is located approximately 0.3 miles from the Project Site. However, as discussed previously, the Project includes development of the Project Site with a self-storage use (with a neighborhood-serving retail component), similar to other commercial uses already found in the Project Site area and region that would use common types of cleaning products, paint, petroleum products, etc. The proposed self-storage use would not generate hazardous emissions. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, Project impacts related to this issue would be less than significant.

d) Would the project 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?

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, and landfills with migrating hazardous waste).[63] Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is not located within two (2) miles of a public airport. The closest airport is the Van Nuys Airport located approximately eight (8) miles northeast of the site. Thus, the Project would not result in a safety hazard or excessive noise associated with an airport for people residing or working in the Project Site area. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or

63 *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=map, accessed January 24, 2023.*

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

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

Less Than Significant Impact. The Project includes infill development of the Project Site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses within an urbanized area of the City, surrounded by established land use patterns and roadway and utility infrastructure. The Project would be required to comply with all fire protection and prevention requirements, including, but not limited to: inclusion of a fire suppression sprinkler system and smoke alarms, fire-rated walls, building setbacks, emergency access, and fire flow. As a self-storage facility and commercial/retail use, the Project is a relatively low-density use that does exacerbate wildfire risks. Thus, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, Project impacts related to wildland fires would be less than significant.

Cumulative Impacts

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 boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant cumulative impacts related to hazards and hazardous materials would occur.

X. HYDROLOGY AND WATER QUALITY

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

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. The Project would be required to comply with the NPDES General Construction Permit 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 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 typically associated with mixed-use developments (e.g., household cleaners, 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 Stormwater LID Ordinance applies to all development and redevelopment in the City that requires 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 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. 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.

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

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

No Impact. The Project Site in its existing condition is completely developed with impervious surfaces such as the foundation of the previous restaurant building, parking areas, and paved driveways and walkways. During storm events, nearly all of the storm water that encounters the Project Site is directed to the existing local storm drain system. No storm water at the Project Site reaches groundwater levels. As such, the Project Site

is not a source of groundwater recharge. Under the Project, all stormwater would be directed toward landscaped areas and/or the local storm drain system and would not have the ability to reach groundwater level at the Project Site. Additionally, all water consumption associated with the Project would be supplied by the City and not from groundwater beneath the Project Site. Thus, the Project would have no effect on groundwater supplies or recharge, and no impacts related to this issue would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site?

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. As discussed previously, the Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Thus, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Therefore, Project impacts related to erosion or siltation would be less than significant.

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

Less Than Significant Impact. As stated previously, given the existing surface site conditions, during storm events, nearly all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not cause flooding on or off site. Therefore, Project impacts related to flooding would be less than significant.

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

Less Than Significant Impact. As stated previously, given the existing surface site conditions, during storm events, nearly all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The Project Site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[64] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is not in an area susceptible to seiches, tsunamis, or mudflows. 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.

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

Less Than Significant Impact. As discussed previously in response to Checklist Question X(a), the Project would be required to comply with the NPDES General Construction Permit 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 construction stormwater runoff would not violate water quality and/or discharge requirements.

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64 *FEMA, https://msc.fema.gov/portal/search?AddressQuery=350%20Hill%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor, accessed January 24, 2023.*

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, 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 LID Ordinance. The Stormwater LID Ordinance applies to all development and redevelopment in the City that requires 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 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. 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.

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

As discussed in response to Checklist Question X(b), the Project Site in its existing condition is completely developed with impervious surfaces such as the foundation of the previous restaurant building, parking areas, and paved driveways and walkways. During storm events, nearly all of the storm water that encounters the Project Site is directed to the existing local storm drain system. No storm water at the Project Site reaches groundwater levels. As such, the Project Site is not a source of groundwater recharge. Under the Project, all stormwater would be directed toward landscaped areas and/or the local storm drain system and would not have the ability to reach groundwater level at the Project Site. Additionally, all water consumption associated with the Project would be supplied by the City and not from groundwater beneath the Project Site. Thus, the Project would have no effect on groundwater supplies or recharge, and no impacts related to this issue would occur..

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The sites of the Project and the related project are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality

of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID requirements 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?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and has historically been developed. The site is surrounded by existing development, Ventura Boulevard, and the 101 Freeway. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant.

Regional Plans

SCAG's 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) periodically. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS. 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 reduced dependence on automobiles and increased 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 the implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

As discussed in 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
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This goal is directed toward SCAG and the City and does not apply to the Project.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to transit (Metro lines 162, 243, and 244), existing residential neighborhoods and other residential uses on Ventura Boulevard. The Project would provide a local-serving self-storage use with a neighborhood-serving retail component within a short driving distance for its users. Additionally, the Project would provide bicycle and EV parking.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to existing residential neighborhoods and other residential uses on Ventura Boulevard. The

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

Goals and Guiding Principles	Consistency Assessment
	Project would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users. Additionally, the Project would provide bicycle and EV parking, which would allow employees of the Project to choose cycling and employees and users of the Project to use electric vehicles to travel to/from the Project Site as opposed to gas-fueled vehicles.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to existing residential neighborhoods and other residential uses on Ventura Boulevard. The Project would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users. Additionally, the Project would provide bicycle and EV parking. Further, the Project includes less vehicle parking than what is required by the LAMC, and the Project would share vehicle parking between two or more users. Close proximity to users, inclusion of bicycle and EV parking, and reduced/shared vehicle parking would reduce mobile-source GHG emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to existing residential neighborhoods and other residential uses on Ventura Boulevard. The Project would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users. Additionally, the Project would provide bicycle and EV parking. Close proximity to users and inclusion of bicycle and EV parking would support healthy and equitable communities. Additionally, the Project would include a solar-ready area on the roof for future installation of solar power.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to transit (Metro lines 162, 243, and 244), existing residential neighborhoods, and other residential uses on Ventura Boulevard. The Project

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

Goals and Guiding Principles	Consistency Assessment
	would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users. Additionally, the Project would provide bicycle and EV parking. Further, the Project includes less vehicle parking than what is required by the LAMC, and the Project would share vehicle parking between two or more users. Close proximity to users, inclusion of bicycle and EV parking, and reduced/shared vehicle parking would 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.

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

Goals and Guiding Principles	Consistency Assessment
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS.	

SCAQMD's Air Quality Management Plan

As discussed early in this document, the Project Site falls within an area within the jurisdiction of the SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local governments about how to incorporate these strategies into their land use plans and decisions about development.

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

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

The Project's consistency with the AQMP is discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency). As discussed there, the Project would be consistent with the AQMP.

Local Plans

City of Los Angeles General Plan

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

General Plan (Framework Element)

The Project's consistency with the General Plan Framework Element land use objectives is discussed in Table XI-2. As shown, the Project would be substantially consistent with the Framework Element.

Table XI-2
Project Consistency with the Framework Element

Objective	Project Consistency
Land Use	
3.1 Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to existing residential neighborhoods and other residential uses on Ventura Boulevard. The Project would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users.
3.2 Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor and in close proximity to existing residential neighborhoods and other residential uses on Ventura Boulevard. The Project would provide a local-serving self-storage use with a neighborhood-serving retail use component within a short driving distance for its users that would reduce VMT and associated mobile-source emissions.
3.3 Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	**Consistent.** The Project would add approximately 11 jobs to the Project Site, employment that could be accommodated by the existing workforce in the Project Site area. As discussed later in this document, the Project could be served by existing transportation and utility infrastructure and public services.
3.4 Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards,	**Consistent.** The Project is an infill development located on the dense Ventura Boulevard corridor. The Project would serve existing residential neighborhoods and would not result in the loss of any housing.

Table XI-2
Project Consistency with the Framework Element

Objective	Project Consistency
while at the same time conserving existing neighborhoods and related districts.	
General Commercial Areas	
3.12 Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	**Consistent.** The proposed self-storage and neighborhood-serving retail uses would serve residential uses located within close proximity to the Project Site and would not affect any other commercial use.

Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2016.

Canoga Park-Winnetka-Woodland Hills Community Plan

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area is in the southwest San Fernando Valley. The Community Plan Area covers 17,887 acres -- approximately 6 percent of the land in the City. Planning communities that border this CPA are Chatsworth-Porter Ranch, Reseda-West Van Nuys, Encino-Tarzana, the Cities of Hidden Hills and Calabasas, and portions of Los Angeles and Ventura Counties.

A diverse natural and socioeconomic landscape characterize this Community Plan Area. Dominant on the natural landscape are the Simi Hills of West Hills, the hillsides of the Santa Monica Mountains and the Chalk Hills of Woodland Hills, and the valley plain in Canoga Park and Winnetka. Initially an agricultural cattle oriented community, the area has undergone substantial residential and commercial development over the last fifty years. As agriculture gave way to industry, the aerospace industry transformed the Community Plan Area. Today the Canoga Park-Winnetka-Woodland Hills- West Hills Community Plan Area offers a diverse range of housing opportunities and is the economic hub of the San Fernando Valley. The Community Plan Area consists of four community subareas, each with a distinct identity.

Canoga Park: Settled early this century, Canoga Park is the heart of the West San Fernando Valley. Located within the boundaries of Roscoe Boulevard to the north, south to Victory Boulevard, Fallbrook Avenue to the West and De Soto Avenue to the east, this area contains a diversity of housing and commercial activity. The traditional main street commercial corridor is being reestablished as a community hub for cultural and social activities.

Woodland Hills: This subarea lies in the southern portion of the Community Plan Area. The boundaries run generally along Victory Avenue from Corbin Street to Topanga Canyon Boulevard, Topanga Canyon Boulevard to US 101, US 101 Freeway west to the City limits, and the Santa Monica Mountains on the south. This subarea contains a variety of predominantly single-family homes and is home to Pierce College and Warner Center.

West Hills: This primarily single-family neighborhood is bound by Roscoe Boulevard to the north, Topanga Canyon Boulevard on the east, the Ventura Freeway to the South, and the Simi Hills on the South and Southwest.

Winnetka: One of the earliest subareas to be settled, this community is bound by Roscoe Boulevard on the north, Corbin Avenue on the east, Victory Boulevard on the South, and De Soto Avenue on the West.

Consistency of the Project with the applicable policies in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan is discussed in Table XI-3. As discussed, the Project would be substantially consistent the Community Plan.

Table XI-3
Project Consistency with the Applicable Policies of the
Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

Policy	Consistency Discussion
Commercial	
2-1.1 Locate new commercial development in areas currently designated for such development.	**Consistent.** The Project includes development of a self-storage use with a neighborhood-serving retail component that is allowed under the existing Neighborhood and General Commercial land use designation for the Project Site.
2-2.1 Require that any proposed development be designed to enhance and be compatible with adjacent development.	**Consistent.** The Project Site is located along a corridor of Ventura Boulevard that is developed largely with commercial land uses but also with some residential uses. The Project Site is bounded by Ventura Boulevard to the south, surface parking lots to the east and west, and a right-of-way associated with the Ventura Freeway to the north. The Project includes development of the Project Site with a self-storage use with a neighborhood-serving retail component that is compatible with the adjacent land uses.

Table XI-3
Project Consistency with the Applicable Policies of the
Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

Policy	Consistency Discussion
2-2.3 Preserve community character, scale and architectural diversity.	**Consistent.** The Project includes development of a self-storage use with a neighborhood-serving retail component along Ventura Boulevard, which is developed with a mix of primarily commercial/retail land uses but also with some residential uses. The Project would enhance the character of the Project Site and surrounding area by removing surface parking and a remanent of a previous building and redeveloping the Project Site with a self-storage use with a neighborhood-serving retail component that meets current City design standards.
2-4.1 Ensure that commercial infill projects achieve harmony with the best of existing development.	**Consistent.** The Project includes development of a self-storage facility with a neighborhood-serving retail component along Ventura Boulevard, which is developed with a mix of primarily commercial/retail land uses but also with some residential uses. The Project would enhance the character of the Project Site and surrounding area by removing surface parking and a remanent of a previous building and redeveloping the Project Site with a self-storage/retail use that meets current City design standards.
Recreation and Park Facilities	
Police Protection	
8-1.1 Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**Consistent.** As discussed in response to Checklist Question XV(a)(ii), the Project would not result in any significant impacts related to police services.
Fire Protection	
9-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**Consistent.** As discussed in response to Checklist Question XV(a)(i), the Project would not result in any significant impacts related to fire protection services.

Table XI-3
Project Consistency with the Applicable Policies of the
Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

Policy	Consistency Discussion
Transportation Demand Management	
11-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).	**Consistent.** The Project would generate approximately 11 jobs, which could be filled by the existing workforce in the Project Site area. The Project Site is located near existing sources of transit, including Metro lines 162, 243, and 244.
Transportation System Management	
13-1.1 Maintain a satisfactory LOS for streets and highways that should not exceed LOS "D" for Major Highways, Secondary Highways, and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS "E".	**Consistent.** As discussed in response to Checklist Question XVII(b), the Project would not result in any significant VMT impacts.
13-2.1 No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.	**Consistent.** As discussed in response to Checklist Question XVII(b), the Project would not result in any significant VMT impacts.
13-2.2 Driveway access points onto major and secondary highways, arterial, and collector streets should be limited in number and be located to insure a smooth, and safe flow of vehicles and bicycles.	**Consistent.** Vehicular access to the Project would occur via one driveway on Ventura Boulevard at the southeast corner of the Project Site.
Parking	
15-1.1 Consolidate parking where appropriate, to minimize the number of ingress and egress points onto Major and Secondary Highways.	**Consistent.** All parking associated with the Project would be on the Project Site. Also, vehicular access to the Project would occur via one driveway on Ventura Boulevard at the southeast corner of the Project Site.
Source: Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan.	

Ventura/Cahuenga Boulevard Corridor Specific Plan

The Project Site is located within the boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan (Specific Plan). As stated previously, the existing land use

designation for the Project Site is General Commercial. Section 6.B.3 of the Specific Plan restricts floor-area-ratio (FAR) within the Neighborhood and General Commercial land use designation to a maximum FAR of 1:1. Due to the unique physical configuration of the Project Site, the Applicant seeks an Exception to the Specific Plan to accommodate the operational and functional needs of the proposed mixed-use self-storage facility. The Project Site is a rectangular-shaped parcel of land with a lot area of approximately 53,433 square feet with approximately 300 feet of linear frontage on the north side of Ventura Boulevard as well as along the US 101 (Ventura Freeway) to a varied depth from approximately 165 feet (at the west) to approximately 190 feet (at the east). The Project includes approximately 158,371 square feet of floor area and the Project Site has a buildable area of approximately 52,983 square feet, resulting in an FAR of 2.96:1. The request for a Specific Plan Exception for an FAR of 2.96:1 in lieu of the 1:1 maximum FAR permitted is necessary for the self-storage function.

The Specific Plan limits building height at the Project Site to 30 feet. The Applicant also seeks the Specific Plan Exception to allow for an increase in the maximum building height from the permitted 30 feet to 37 feet 7½ inches, which would accommodate the three-story mixed-use self-storage facility. The west-to-east downward-sloping nature of the Project Site, which in conjunction with accommodating the subterranean construction, necessitate the resulting height request. Also, the exception is needed to relief from the stepback requirement of the specific plan Section 7.E.1.f.

Additionally, pursuant to Section 11.5.7(C) of the LAMC, the Applicant is required to undergo a review of the Project by the City to ensure the Project's compliance with the regulations established in Section 11.5.7(C) and with the applicable regulations of the Specific Plan and a shared parking agreement in conformance with the requirements under LAMC Section 12.24.X20(a) to permit 22 shared parking spaces in lieu of 43 spaces otherwise required. The determination of compliance will be made by the City. Given that self-storage users do not all arrive at the facility on a predictable schedule and patronize the use variably on a 24-hour schedule, 43 parking spaces would likely not ever be used all at once and would minimize the ability of the self-storage use to provide service to the community.

The Project substantially complies with all other applicable regulations of the Specific Plan and is substantially consistent with its purposes and vision for development in this community. With the requested entitlements, the Project would be substantially consistent with the Specific Plan, and Project impacts related to consistency with the Specific Plan would be less than significant.

Planning and Zoning Code

In addition to the requested discretionary approvals discussed above, the Applicant seeks the additional discretionary approvals:

- Pursuant to Section 16.05 of the LAMC, Site Plan Review for a project greater than

50,000 square feet.

- Pursuant to Section 12.24(W)(50) of the LAMC, a Conditional Use Permit to allow a storage facility within 500 feet of a residential zone.

- The purposes of the Site Plan Review are for the City to ensure:

  …orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City's environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.

Because the Project includes development of more than 50,000 square feet, the Site Plan Review is a requirement that the Project must comply with. The City will use this Initial Study/Mitigated Negative Declaration to confirm that the Project would not result in any unmitigated significant environmental impacts.

Because the Project includes development of a self-storage facility within 500 feet of a residential zone, the Project is required to obtain a Conditional Use Permit. This allows the City to ensure that the Project would be compatible with other uses in the Project Site area to minimize environmental impacts.

The Applicant seeks a Shared Parking approval to permit two or more uses to share off-street parking spaces.

The Project would be required to comply with the noted sections of the LAMC, and as a result, the Project would not conflict with the LAMC.

Cumulative Impacts

As discussed previously, the Project would be substantially consistent with the applicable plans, policies, or regulations associated with development of the Project Site. The City assesses the consistency of all development in the City with all applicable plans, policies, and regulations associated with those projects, on a project-by-project basis. Regardless of any potential inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

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

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site is located in a highly urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity.[65] Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

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

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site.[66] Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

[65] *California Department of Conservation, Mineral Land Classification, https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc, accessed January 24, 2023.*

[66] *Ibid.*

XIII. NOISE

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

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

- *Noise Technical Report, DKA Planning, January 2023.*

Fundamentals of Noise

Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table XIII-1 provides examples of A-weighted noise levels from common sources.

Table XIII-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. *These noise levels are approximations intended for general reference and informational use.*	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (Leq), maximum noise level (Lmax) and the Community Noise Equivalent Level (CNEL).

Equivalent Noise Level (L_{eq}). L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[67] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[68]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.[69] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.[70] However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.[71]

Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of

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

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

69 Ibid.

70 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

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

distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.[72] The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Fundamentals of Vibration

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[73]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that can disrupt concentration or disturb sleep. Groundborne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes

Unlike noise, groundborne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well

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[72] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

[73] *Ibid.*

below the threshold of perception for humans, approximately 0.01 inches per second.[74] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Setting

Noise

Federal

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project, which is a private development in the City. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

State

The California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown on Table XIII-2. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

[74] *Ibid.*

Table XIII-2
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.

City

The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary construction activities. Section 41.40(a) would prohibit construction activities between 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 A.M. to 9:00 P.M., and 8:00 A.M. to 6:00 P.M. on Saturdays or national holidays.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

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

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

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

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

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

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

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

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

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

In addition, the LAMC regulates long-term operations of land uses, including but not limited to the following regulations:

Section 111.02 discusses the measurement procedure and criteria regarding the sound level of "offending" noise sources. A noise source causing a 5 dBA increase over the existing average ambient noise levels of an adjacent property is considered to create a noise violation. However, Section 111.02(b) provides a 5 dBA allowance for noise sources lasting more than five but less than 15 minutes in any 1-hour period, and a 10 dBA allowance for noise sources causing noise lasting 5 minutes or less in any 1-hour period. In accordance with these regulations, a noise level increase from certain city-regulated noise sources of five dBA over the existing or presumed ambient noise level at an adjacent property is considered a violation.

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

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for

any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

The LAMC also provides regulations regarding vehicle-related noise, including Sections 114.02, 114.03, and 114.06. Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. Section 114.06 requires vehicle theft alarm systems to be silenced within five minutes.

Vibration

Federal

Federal Transit Administration (FTA)

In 2018, the FTA published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table XIII-3 summarizes FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

Table XIII-3
FTA Vibration Damage Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV at 25 Feet)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches

per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers, and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

Existing Conditions

Noise Sensitive Receptors

Noise sensitive receptors in the vicinity of the Project Site include, but are not limited to, the following representative sampling:

- Sunrise of Woodland Hills, assisted living facility; 20461 Ventura Boulevard; approximately 70 feet west of the Project Site
- Kol Tikvah Early Childhood Center, 20400 Ventura Boulevard; approximately 130 feet south of the Project Site.
- Residences, 20400 block of Clark Street; approximately 490 feet north of the Project Site across the Ventura Freeway.
- Taft High School, 5461 Winnetka Avenue; approximately 670 feet east of the Project Site.

Existing Ambient Noise Levels

The Project Site was most recently developed with a restaurant, which has been demolished, and is currently being temporarily used as a surface parking lot by Access Animal Specialty Animal Hospital located at 20051 Ventura Boulevard

The primary source of noise near the Project Site is vehicle traffic, as transportation noise is the main source of noise in urban environments, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[75] The major source of vehicle noise in the area is traffic on the Ventura Freeway, located about 100 feet north of the Project Site, where up to 15,400 vehicles per hour contribute substantially to noise on the northern portion of the Project Site.[76] At the southern portion of the Project Site, traffic noise from Ventura Boulevard is the prime contributor, where about 3,002 A.M. peak-hour vehicles travel east and west between Winnetka Avenue and Kelvin Avenue.[77]

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75 *World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.*

76 *Caltrans Traffic Census Program data, 2020 peak hour volumes for US-101 at Winnetka Avenue; https://dot.ca.gov/programs/traffic-operations/census*

77 *DKA Planning 2022, based on City of Los Angeles database of traffic volumes on Ventura Boulevard between Winnetka Avenue and Kelvin Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/VENTURA.BTWN.CHALKHILL.VILLATERAZA.161*

In January 2022, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions in the Project Site area.[78] These measures noise levels are shown in Table XIII-4.

Table XIII-4
Measured Ambient Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. Sunrise of Woodland Hills	Traffic on Ventura Blvd.	67.4	65.4	Residences – Ventura Blvd. (20500 block); Sunrise of Woodland Hills	Conditionally Acceptable
B. Clark St. (20400 block)	Traffic on Ventura Freeway	72.6	70.6	Residences, Clark St. (20400 block)	Normally Unacceptable
C. Taft High School	Traffic on Ventura Blvd.	69.2	67.2	Taft High School	Conditionally Acceptable
D. Kol Tikvah Preschool	Traffic on Ventura Blvd.	69.8	67.8	Kol Tivah Preschool	Conditionally Acceptable

[a] *Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2016 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.*

[b] *Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 above for definition of compatibility designations.*

Source: DKA Planning, 2023. Refer to Appendix J.

220-NDSAUTO%20AS.pdf, 2016 traffic counts adjusted by one percent growth factor to represent existing conditions.

78 *Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*

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

Less Than Significant Impact. Based on the Noise Technical Report prepared for the Project, the Project's noise impacts would be less than significant.

Construction Noise

Construction Noise Thresholds of Significance

A project's construction noise impacts could be considered significant if the following occurred:

- Construction activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

Construction Noise Impacts

On-Site Construction Activities

The Project's construction activities (i.e., demolition, site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings) would generate varying levels of noise. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally lesser than during grading because

they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels. As shown in Table XIII-5, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. These construction noise levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table XIII-5
Construction Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant ?
1. Residences – Ventura Blvd. (20500 block)	56.7	67.4	67.8	0.4	No
2. Residences – Sunrise of Woodland Hills	56.4	67.4	67.7	0.3	No
3. Residences – Clark St. (20400 block)	53.2	72.6	72.6	0.0	No
4. Taft High School	30.1	69.2	69.2	0.0	No
5. Kol Tikvah Preschool	53.5	69.8	69.9	0.1	No
Source: DKA Planning, 2023.					

Off-Site Construction Activities

The Project would generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor and contractor trips; and worker commute trips. These activities would generate up to an estimated 774 peak hourly passenger-car-equivalency (PCE) vehicle trips, as summarized in Table XIII-6, during the grading phase, assuming all workers travel to the work site at the same time. This includes converting noise from heavy-duty truck trips to an equivalent number of passenger vehicle trips. This would represent about 25.8 percent of traffic volumes on Ventura Boulevard, which carries about 3,002 vehicles between Winnetka Avenue and Kelvin Avenue in the morning peak hour of traffic.[79]

[79] *DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Ventura Boulevard between Winnetka Avenue and Kelvin Avenue,*

Table XIII-6
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of A.M. Peak-Hour Trips on Ventura Blvd.[e]
Demolition	13	0	70[b]	82	2.7
Site Preparation	8	0	0	8	0.2
Grading	10	0	764[c]	774	25.8
Trenching	10	0	0	10	0.3
Building Construction	67	71[d]	0	137	4.6
Paving	13	0	0	13	0.4
Architectural Coating	13	0	0	13	0.4

[a] *Assumes all worker trips occur in the peak hour of construction activity.*
[b] *The project would generate 537 haul trips over a 21-day period with seven-hour workdays. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent*
[c] *The project would generate 12,317 haul trips over a 44-day period with seven-hour workdays. Assumes a 19.1 PCE.*
[d] *This phase would generate about 26 vendor truck trips daily over a seven-hour workday. Assumes a 19.1 PCE.*
[e] *Percent of existing traffic volumes on Ventura Boulevard between Winnetka Avenue and Kelvin Avenue.*

Source: DKA Planning, 2023. Refer to Appendix J.

Ventura Boulevard would serve as part of the haul route for any soil exported from the Project Site given its access to north-south arterials that connect to the Ventura Freeway. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Ventura Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more. Therefore, the Project's off-site construction noise impacts would be less than significant.

https://navigatela.lacity.org/dot/traffic_data/automatic_counts/VENTURA.BTWN.CHALKHILL.VILLATERAZA.161220-NDSAUTO%20AS.pdf.

Operational Noise

Operational Noise Thresholds of Significance

A project's operational noise impacts could be considered significant if the following occurred:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.

- Project operations would cause any 5 dBA CNEL or greater noise increase.

Construction Noise Impacts

On-Site Operational Noise

During long-term operations, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be less than significant.

Mechanical Equipment

The Project would operate mechanical equipment on the northern portion of the roof that would generate incremental long-term noise impacts. HVAC equipment in the form of 32 large rooftop units suitable for cooling large volumes of a building would be located on the rooftop, approximately 33 feet and 4 inches above grade. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[80]

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, ambient noise levels at receptors with a line of sight to the Project Site (e.g., Sunrise of Woodland Hills, residences on Clark Street) would neutralize any marginal noise from these HVAC units. Second, the presence of the Project's roof edge creates an effective noise barrier that further reduces

[80] *City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.*

noise levels from rooftop HVAC units by 8 dBA or more. A parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts. Compliance with LAMC Section 112.02 would further limit HVAC equipment noise levels.

Auto-Related Activities

The majority of vehicle-related noise levels at the Project Site would come from vehicles entering and exiting the development from a driveway off Ventura Boulevard. Because self-storage facilities generate traffic differently than conventional commercial land uses, the peak hours of vehicle travel would be mid-day, outside the peak hours of traffic congestion, where up to 48 vehicles would access the development.[81] Vehicles would either park in the surface-level lot or use the five loading spaces that are located inside the development. Parking lot noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. Visitors would load and unload materials onto dollies and other moving equipment, generating low levels of noise.

As a result, these noise sources would be intermittent, concentrated during the mid-day period, and would not collectively elevate ambient noise levels by more than 1 dBA CNEL over a 24-hour period. The ambient noise levels near the Ventura Freeway that range from 65.4 to 70.6 dBA L_{eq} would further negate any noise from outdoor moving activities at sensitive receptors across the Ventura Freeway and across Ventura Boulevard. Other receptors (e.g., Sunrise of Woodland Hills) would be shielded from parking lot activities by the structure itself. This incremental noise impact would be far less than the 5 dBA CNEL threshold of significance for operational noise impacts. As such, the Project's auto-related noise impacts would be less than significant.

Outdoor Uses

While most operations would be conducted inside the development, other outdoor activities could generate noise that could impact local sensitive receptors. This would include trash collection, landscape maintenance, and commercial loading. These are discussed below:

- *Trash collection*. On-site trash and recyclable materials would be managed from the waste collection area at the east end of the parking lot. Haul trucks would access solid waste from Ventura Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the

81 *Trip generation calculated in CalEEMod based on ITE trip generation rates.*

refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[82] Intermittent solid waste management activities would operate during the day. Trash collection activities would not substantially elevate 24-hour noise levels at off-site locations by 5 dBA CNEL or more.

- *Landscape maintenance*. As landscaping would be minimal, noise from any maintenance equipment is not anticipated.

- *Commercial loading*. On-site loading and unloading activities would be managed via five loading spaces inside the development, which is accessible from the parking lot off Ventura Boulevard. Loading and unloading activities would occur within the first floor of the structure facing eastward, obscured from any off-site sensitive. As a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations. Further, LAMC Section 114.03 would regulate loading and unloading activities between 10:00 P.M. and 7:00 A.M.

Based on an assessment of these on-site sources, the Project's onsite operation noise impacts would be less than significant.

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add up to 235 net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025. During the P.M. peak hour, up to 22 vehicles would generate noise in and out of the parking lot via the driveway off Ventura Boulevard.[83] This would represent about 0.8 percent of traffic volumes on Ventura Boulevard, which carries about 3,002 vehicles between Winnetka Avenue and Kelvin Avenue in the morning peak hour of traffic.[84]

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four-hour CNEL impacts would similarly be minimal, far below the criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

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82 *RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.*

83 *Trip generation calculated in CalEEMod based on ITE trip generation rates.*

84 *DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Ventura Boulevard between Winnetka Avenue and Kelvin Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/VENTURA.BTWN.CHALKHILL.VILLATERAZA.161220-NDSAUTO%20AS.pdf, 2016 traffic counts adjusted by one percent growth factor to represent existing conditions.*

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

Less Than Significant Impact. Based on the Noise Technical Report prepared for the Project, the Project's noise impacts would be less than significant.

Construction

On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-7 summarizes vibratory levels for common construction equipment.

Groundborne vibration would be generated by construction activities at the Project Site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.032 inches per second PPV are projected to occur at the Sunrise of Woodland Hills building, the nearest structure to the Project Site (refer to Table XIII-8). This impact is below the 0.25 inches per second PPV threshold from FTA that is considered potentially harmful to Category II buildings, conservatively assumed for all three structures analyzed below. As shown in Table 10, more distant receptors would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. Therefore, the Project's construction-related vibration impacts from on-site sources would be less than significant

Table XIII-7
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Table XIII-8
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Sunrise of Woodland Hills	70	0.032	0.032	0.027	0.088	0.008	0.20[a]	No
Kol Tikvah Preschool	130	0.017	0.017	0.015	0.007	0.001	0.20 [a]	No
Chalk Hill Court Building	160	0.014	0.014	0.012	0.005	0.000	0.20 [a]	No

[a] *FTA criterion for Category II (non-engineered timber and masonry buildings)*

Source: DKA Planning, 2023.

Off-Site Sources

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[85] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's haul route on Ventura Boulevard and any arterials that connect to the Ventura Freeway that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, the Project's construction-related vibration impacts from off-site sources would be less than significant.

[85] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.*

Operation

During operation of the self-storage facility and the retail use, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However, vehicles traveling on roads in urban areas with regularly maintained roads rarely create vibration levels perceptible to humans. Therefore, the Project's operational vibration impacts would be less than significant.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. The airport closest to the Project Site is the Van Nuys Airport located approximately 7.8 miles to the northeast. Therefore, the Project would not expose people residing or working in the Project Site area to excessive noise levels and no impact would occur.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The related project is almost completely constructed and will be operational prior to the beginning of the construction phase for the Project. Thus, no cumulative construction noise impacts would occur. Additionally, given the distance of the related projects from the Project Site, intervening development, and the Project's minor operational noise levels and given that ambient noise levels in the Project Site area are dominated by vehicle traffic on the 101 Freeway and Ventura Boulevard, cumulative development would not result in a noticeable increase in ambient noise levels. Therefore, cumulative noise impacts 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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project includes infill-development of the Project Site and redevelopment of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses that would serve an area currently developed with a mix of commercial and residential land uses. The self-storage facility would employ approximately eight (8) people, while the commercial/retail use would employ approximately three (3) people. The types of jobs that would be made available by the Project could be filled by the existing workforce in the Project Site area, and the Project would not cause a substantial number of new residents to move to the Project Site area and surrounding communities to fill the employment positions. Also, the Project does not include the development of housing and would be served by existing roadways and utility infrastructure. For these reasons, the Project would not induce substantial population growth, and impacts related to this issue would be less than significant.

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

No Impact. No housing is located on the Project Site. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The related project is a car dealership that is anticipated to generate approximately 60 jobs.[86] This related project site was previous developed with a different car dealership. As with the Project, it is likely that the employment associated with the car dealership could be accommodated by the existing workforce in the City and would not result in new residents moving to the City to fill the job positions. However, conservatively assuming that 60 new residents moved to the City, this would not represent substantial unplanned population growth, given that 60 new residents would be a relatively minor increase, and the car dealership use is a planned use. Thus, cumulative development would not result in substantial unplanned growth and would not create the need for new housing. Therefore, cumulative population and housing impacts would be less than significant.

86 *Keyes Porsche Initial Study/Mitigated Negative Declaration, Envicom Corporation, October 2019.*

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a) Fire protection?

Less Than Significant Impact. The Project includes demolition and removal of the remnant building foundation and surface parking areas at the Project Site and development of the site with a 156,917-square-foot self-storage facility and 1,400 square feet of neighborhood-serving commercial/retail uses, adding a total of approximately 11 employees to the site, creating a need for fire protection services at the Project Site. Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.09.07, the maximum response distance between a high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.

The Project Site is served by several fire stations, as shown in Table XV-1. As shown, the Project Site is located approximately 1.3 miles from Fire Station 84. However, the proposed building would be required by the City to include a fire sprinkler system.

All ingress/egress associated with the Project would be designed and constructed in conformance with all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Thus, the Project would not result in any significant impacts related to emergency access. The approximate fire-flow requirement

for the Project is 4,000 gallons per minute with a 20 pounds-per-inch residual pressure. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these requirements, Project impacts related to fire protection services would be less than significant.

Table XV-1
Fire Stations Serving the Project Site

No.	Address	Distance from Project Site (miles)
68	24130 Calabasas Road	5.0
72	6811 De Soto Avenue	2.6
84	21050 Burbank Boulevard	1.3
93	19059 Ventura Boulevard	1.7
105	6345 Fallbrook Avenue	4.0
Source: http://www.lafd.org/fire-stations/find-your-station		

b) Police protection?

Less Than Significant Impact. The Project includes demolition and removal of the remnant building foundation and surface parking lot at the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses, adding a total of approximately 11 employees to the site, creating a need for fire protection services at the Project Site, increasing the need for police protection services at the Project Site. However, in accordance with the City's Standard Condition of Approval, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. Security features that would be included as part of the Project include, but are not limited to, the following:

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

These measures for the Project shall be approved by the LAPD prior to the issuance of building permits. Through compliance with the requirements of the LAPD and inclusion of the proposed security features, Project impacts related to police protection services would be less than significant.

c) Schools?

Less Than Significant Impact. The Project includes demolition and removal of the existing building foundation and parking areas at the Project Site and development of the site with a 156,917-square-foot self-storage facility and 1,400 square feet of neighborhood-serving commercial/retail uses, which would serve an area currently developed with commercial and residential land uses. The Project does not include development of any residential population that would increase the need for school services. The Project would employ approximately 11 people. The types of jobs associated with the Project could be filled by people already living in the Project Site area and surrounding communities. The Project would not create such an increase in employment that would cause a substantial number of new people (with school-age children) to move to the Project Site area and surrounding communities to fill the employment positions. Additionally, pursuant to the California Government Code, payment of the school fees established by the Los Angeles School District (LAUSD) 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.

d) Parks?

No Impact. The Project includes demolition and removal of the existing building foundation and parking areas at the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail use spaces, which would serve an area currently developed with commercial and residential land uses. The Project does not include generation of any residential population that would increase the need for parks and recreational facilities. The Project would not create the need for new or altered parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

e) Other public facilities?

Libraries

No Impact. The Project includes demolition and removal of the existing building foundation and parking areas at the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot

climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail spaces, which would serve an area currently developed with commercial and residential land uses. The Project does not include generation of any residential population that would increase the need for library services. The Project would not create the need for new or altered library facilities. Therefore, no impacts related to library services would occur as a result of the Project.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The related project located (a car dealership) is almost completely constructed and will be operational prior to the beginning of the construction phase of the Project. Given that the related project is nearing its operational phase, this related project has already undergone review by the LAFD and the LAPD and has already paid developer fees to the LAUSD. As with the Project, the car dealership would not create a need for parks or library services. For these reasons, cumulative impacts on public services would be less than significant.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

No Impact. The Project includes demolition and removal of the existing building foundation and parking areas at the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses, which would serve an area currently developed with commercial and residential land uses. The Project does not include generation of any residential population that would increase the need for parks and recreational facilities. The Project would not create the need for new or altered parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

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

No Impact. The Project includes demolition and removal of the existing building foundation and parking areas at the Project Site and development of the site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses, which would serve an area currently developed with commercial and residential land uses. The Project does not include generation of any residential population that would increase the need for parks and recreational facilities. The Project would not create the need for new or

altered parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). The related project located (a car dealership) is almost completely constructed and will be operational prior to the beginning of the construction phase of the Project. As with the Project, the car dealership would not create a need for parks or library services. For these reasons, cumulative impacts on public services would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

- *Transportation Study Assessment Referral Form, March 29, 2023.*
- *Parking Analysis, May 2023.*

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

No Impact. As discussed below, based on LADOT's Transportation Study Assessment Referral Form, because the Project would not generate a net increase of 500 or more daily vehicle trips, the Project is considered consistent with programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and no further consistency analysis is required. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. In July 2019, LADOT updated the City's Transportation Assessment Guidelines (TAG) to conform to the requirements of Senate Bill 743 (SB 743). The TAG replaced the *Transportation Impact Study Guidelines* and shifted the performance metric for evaluating transportation impacts under CEQA from level of service (LOS) to VMT for

studies completed within the City. The TAG was updated in July 2020, with further refined and clarified analysis methodologies. Per the TAG, a Transportation Assessment (TA) is required when a development project is likely to add 250 or more net daily vehicle trips to the local street system.

LADOT uses the Transportation Study Assessment Referral Form (refer to Appendix L) as an initial screening procedure to determine whether a project meets the requirements for preparation of a TA. The initial screening questions are included below.

a. Is the project a single retail use that is less than 50,000 square feet?
   Yes No
b. Would the project generate a net increase of 250 more daily vehicle trips?
   Yes No
   Based on trip generation rates in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition), the Project would generate 235 daily trips (refer to the Transportation Assessment Memorandum of Understanding in Appendix L).
c. Would the project generate a net increase of 500 or more daily vehicle trips?
   Yes No
d. Would the project result in a net increase in daily VMT?
   Yes No
e. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station?
   Yes No
f. Does the project trigger Site Plan Review (LAMC 16.05)?
   Yes No

g. Project size:

   i. Would the project generate a net increase of 1,000 or more daily vehicle trips?

      Yes No

   ii. Is the project's frontage 250 linear feet or more along a street classified as an Avenue or Boulevard per the City's General Plan?

      Yes No

   iii. Is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard per the City's General Plan?

      Yes No

<u>VMT Analysis (CEQA Review)</u>

If YES to a. and NO to e., a VMT analysis is NOT required.

If YES to both b and d. or to e., a VMT analysis is required.

Access, Safety, and Circulation Assessment (Corrective Conditions)

If YES to c., a project access, safety, and circulation evaluation may be required.

If YES to f. and either g.i., g.ii., or g.iii., an access assessment may be required.

Because the Project would generate fewer than 250 net daily vehicle trips, preparation of a TA or VMT analysis based on the is not required for the Project. Additionally, according to the TAG, a project that generates fewer than 250 daily vehicle trips and does not require the preparation of a TA or VMT analysis is presumed to have "no impact" related to VMT.

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

No Impact. The Project includes development of a self-storage facility and retail uses on an infill site on Ventura Boulevard, similar to other self-storage/commercial uses found throughout the Project Site area. Thus, the Project is not an incompatible use. The Project would not include the development of any roadway infrastructure and would not result in any hazards due to geometric design features. The Project Site currently has three driveways. The Project would reduce the number of driveways to one driveway, thereby decreasing the potential for pedestrian/bicycle/vehicle conflicts. For these reasons, no impacts related to this issue would occur as a result of the Project.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access.

Cumulative Impacts

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states the following regarding cumulative traffic impacts:

> *Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual 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." (Pub. Resources Code, §*

21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

As discussed above, the Project is screened out from further VMT analysis, as it is presumed the Project would cause less-than-significant transportation impacts. For this reason, the Project's contribution to cumulative traffic impacts would not be substantial, and cumulative traffic impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

- *AB 52 Notification letter and Contact List from the City of Los Angeles, March 2023. Refer to Appendix M.1 and M.2.*
- AB 52 Notification letter from the City of Los Angeles to Fernandeño Tataviam Band of Mission Indians. Refer to Appendix M.3 and M.5.
- Correspondence from Sarah Brunzell, Manager, Cultural Resources Management Division/Tribal Historic and Cultural Preservation Department of Fernandeño Tataviam Band of Mission Indians, April 26 and November 7, 2023. Refer to Appendix M.4 and M.6.

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)?

No Impact. A review of the California Register of Historical Resources showed that the Project Site does not contain any historical resources.[87] Thus, the Project would not 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). Therefore, no impacts related to this issue would occur as a result of the Project.

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 listed or eligible for listing in the California Register of Historical Resources, or in 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 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, 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 a Negative Declaration (ND) 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 tribal cultural resource 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;

87 *State of California, Office of Historic Preservation, California Register of Historical Resources, https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed August 1, 2022.*

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 tribal cultural resource, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a tribal cultural resource. In brief, in order to be considered a tribal cultural resource, 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 tribal cultural resource. 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.

Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day consultation period on March 24, 2023. The City concluded the consultation with Fernandeño Tataviam Band of Mission Indians on April 26, 2023. It is possible that unknown tribal cultural resources could exist at the Project Site that could be encountered, given the relative sensitivity of the Project Site region. As such, the Project would be required to implement Mitigation Measures TCR-1 through TCR-6 to ensure appropriate treatment of potential unknown tribal cultural resources. Compliance with these mitigation measures would ensure that Project impacts related to tribal cultural resources would be less than significant.

Mitigation Measures

TCR-1: Prior to the start of construction, a Qualified representative, procured by the Fernandeño Tataviam Band of Mission Indians and retained by the Project Applicant, shall conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the aspects of Tribal Cultural Resources and the procedures for notifying the Fernandeño Tataviam Band of Mission Indians should Tribal Cultural Resources be discovered by construction staff. Training can be done in conjunction with Cultural Resources WEAP training, if such training is requested by the project's archaeologist.

TCR-2: A Treatment and Disposition Plan (TDP) shall be established, in consultation with the Fernandeño Tataviam Band of Mission Indians, prior

to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The TDP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. 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.

TCR-3: 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 Secretary of Interior standards retained by the project applicant shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment. The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground-disturbing activities.

TCR-4: 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 MLD, as determined by the NAHC, should those findings be determined as Native American in origin.

TCR-5: The Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe the first (5) days of scheduled activities which include clearing, grubbing, and grading operations. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by project applicant, in writing, upon completion of each set of scheduled activities and

5 days' notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request ground-disturbing activities cease within 60 feet of the discovery to assess and document potential finds in real time. A qualified archaeologist meeting Secretary of Interior standards shall also assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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-6: The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to spot check all ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity once weekly for the total duration of such soil disturbing activities. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by project applicant, in writing, upon completion of each set of scheduled activities and 5 days' notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards, retained by the project applicant, as well as the Tribal Monitor, shall assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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.

Cumulative Impacts

Impacts related to tribal cultural resources are site-specific and are assessed on a site-by-site basis. The City requires applicants to assess, determine, and mitigate any

potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with Mitigation Measures TRC-1 through TCR-6 and existing regulations, Project impacts associated with tribal cultural resources would be less than significant. Additionally, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the site of the related project. As such, the Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

- *Correspondence from Shawn Riggs, Construction Manager, Charter Communication, January 21, 2022.*
- *Correspondence from Rodolfo J. Monroy, District Engineer of Valley Service Planning, Los Angeles Department of Water & Power, August 23, 2022.*
- *Correspondence from Lee Guilbeaux, Civil Engineer of Valley District, Los Angeles Department of Public Works, January 20, 2022.*

a) Would the project require or result in relocation or the construction of new or expanded water, wastewater treatment, or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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

Water Facilities

The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

As shown in Table XIX-1, the Project would consume approximately 157 gallons of water per day (or approximately 0.0001 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the Project. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

Table XIX-1
Estimated Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)
Self-Storage (Office)[3]	1,015 sf	120 gpd/1,000 sf	122
Commercial/Retail	1,400 sf	25 gpd/1,000 sf	35
		Total	**157**

gpd = gallons per day

1 *Assumes wastewater generation equals water consumption.*
2 *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates, April 6, 2012. This rate does not assume the effectiveness of any current water conservation measures that are required in the City.*
3 *The "self-storage" portion of the Project would not have water or sewer utilities. Thus, the water consumption/wastewater generation for the Project is based on the "office" portion of the Project.*

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Table XIX-2

shows that the cumulative development (including the Project) could result in the consumption of approximately 2,584 gallons of water per day (or 0.002) million gallons per day [mgd]). It should be noted that this amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely substantially reduce the cumulative water consumption (and wastewater generation) shown on Table XIX-2. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the cumulative development. Therefore, cumulative impacts related to water treatment would be less than significant.

Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)
Car Dealership	80,900 sf	30 gpd/1,000 sf	2,427
		Plus Project	*157*
		Total	**2,584**

gpd = gallons per day *du = dwelling unit* *sf = square feet*

Note: Numbers might not add up due to rounding.

1 Assumes wastewater generation equals water consumption.
2 Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Factors, April 6, 2012. This rate does not assume the effectiveness of any current water conservation measures that are required in the City.

Wastewater Treatment

The Project Site is located within the service area of the Hyperion Water Reclamation Plant (HWRP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment and a peak wet weather flow of 800 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board (LARWQCB) discharge policies for the Santa Monica Bay. The HWRP currently treats an average daily flow of approximately 275 mgd on a dry weather day.[88] Thus, there is approximately 175 mgd available capacity.

88 City of Los Angeles Sanitation Department, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_afrLoop=14693255451939690&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=eljl3h87g_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D14693255451939690%26_afrWindowMode%3D0%26_adf.ctrl-state%3Deljl3h87g_5, accessed January 16, 2023.

As shown in Table XIX-1, the Project would generate approximately 157 gallons of wastewater per day (or 0.0001 mgd). With a remaining daily capacity of 175 mgd, the HWRP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Table XIX-2 shows that the cumulative development (including the Project) could result in the generation of approximately 2,584 gallons of wastewater per day (or 0.002) million gallons per day [mgd]). It should be noted that this amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely substantially reduce the cumulative water consumption (and wastewater generation) shown on Table XIX-2. With a remaining daily capacity of 175 mgd, the HWRP would have adequate capacity to serve cumulative development. Therefore, cumulative impacts related to water treatment 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 discussion of cumulative impacts under Checklist Topic X (Hydrology and Water Quality).

Electrical Power

As discussed in response to Checklist Question VII(a) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the discussion of cumulative impacts under Checklist Topic VII (Energy).

Natural Gas

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

Cumulative Impacts

Refer to the discussion of cumulative impacts under Checklist Topic VII (Energy).

Telecommunications

The Project Site is located in a highly urbanized part of the City that is served by established utilities. In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum. The Project 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

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Similar to the Project, the related project is located in a highly urbanized part of the City that is serviced by established utilities. The related project is almost completely constructed and will be operational prior to the beginning of the construction phase for the Project. Given the status of the related project, the need for telecommunication facilities has already been considered and accommodated. As discussed above, the Project's impacts related to telecommunication facilities would be less than significant. Therefore, cumulative telecommunication facilities impacts would be less than significant.

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

Less Than Significant Impact. LADWP provides water service to the Project Site. LADWP's water supply sources include the Los Angeles Aqueduct (LAA), local groundwater, the SWP (supplied by the Metropolitan Water District [MWD]), the Colorado River Aqueduct (also supplied by MWD), and recycled water.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is LADWP's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including population

growth, weather, water conservation, drought, and economic activity. Table XIX-3 shows a breakdown of historical water demand for the LADWP service area. Table XIX-4 provides LADWP's projected water demand from 2025 to 2045 for average-year, single-dry-year, and multi-dry-year hydrological conditions.

More frequent and longer-lasting dry periods, regulatory constraints, and seismic risks that can result in water delivery system outages are causing increased stress on water supply reliability for LADWP. As such, in preparation to take reasonable actions to balance water demands with limited water supplies, LADWP has prepared a Water Shortage Contingency Plan (WSCP) that outlines a set of actions that the City can take in the event of a declared water supply shortage or emergency situation. The City has six standard water shortage levels and response actions, as summarized in Table XIX-5.

Table XIX-3
Breakdown of Historical Water Demand for LADWP's Service Area

Fiscal Year Ending Average	Single Family		Multi-Family		Commercial		Industrial		Government		Non-Revenue		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2016-2020	170,660	35%	141,088	28%	88,680	18%	14,938	3%	39,628	8%	40,690	8%	495,685
2011-2015	206,652	37%	161,592	29%	96,832	18%	17,855	3%	43,573	8%	26,139	6%	552,768
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33.696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
30-Year Average	212,215	36%	173,755	30%	103,990	18%	20,465	3%	40,982	7%	37,205	6%	588,611

AF = Acre Feet

Source: 2020 Urban Water Management Plan, LADWP.

Table XIX-4
Service Area Reliability Assessment (AFY)

Hydrological Conditions[1]	Years				
	2025	2030	2035	2040	2045
Average Year	642,600	660,200	678,800	697,800	710,500
Single Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year (Year 1)	657,900	675,800	694,900	714,400	727,400
Multi-Dry Year (Year 2)	661,700	679,700	698,900	718,500	731,500
Multi-Dry Year (Year 3)	674,400	693,200	712,800	732,700	746,000
Multi-Dry Year (Year 4)	661,600	679,600	698,900	718,400	731,500
Multi-Dry Year (Year 5)	655,700	673,600	692,600	712,000	724,900

AFY = acre-feet per year

Source: 2020 UWMP, LADWP, Exhibits 11E, 11F, and 11G.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
Level 1: No Shortage	≤10%	Water Shortage Level 1 constitutes a consumer demand reduction of up to 10%. Shortage response actions under this level include the permanent water use restrictions listed below. **<u>Phase I Restrictions</u>** - No LADWP customer shall use a water hose to wash any paved surfaces, except to alleviate immediate safety or sanitation hazards. - No LADWP customer shall use water to clean, fill or maintain levels in decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, unless such water is part of a recirculating system. - No restaurant, hotel, cafe, cafeteria, or other public place where food is sold, served, or offered for-sale, shall serve drinking water to any person unless expressly requested. - No LADWP customer shall permit water to leak from any pipe or fixture on the customer's premises.
Level 2: Moderate Shortage	≤20%	Water Shortage Level 2 is implemented when there is a reasonable probability of supply shortage from LADWP-controlled supplies in the long-term and a demand reduction of up to 20% is necessary to mitigate this long-term shortage risk. Conservation Ordinance Phase 2 will be implemented to achieve the necessary demand reduction. Additionally, to reduce consumption during this phase and all higher levels of conditions, LADWP may increase its public education and outreach efforts and enforcement measure to build awareness of voluntary water conservation practices and all permanent water waste prohibitions. **<u>Actions</u>** <u>Mandatory Conservation Phase 2</u>

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		- Restrictions on landscape irrigation watering days (Monday, Wednesday, or Friday for odd-numbered street addresses and Tuesday, Thursday, or Sunday for even-numbered street addresses). - Irrigation of Sports Fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Increase outreach efforts for high-volume customers and provide one on one assessments. - Expand enforcement of unreasonable use of water. - Increase water conservation rebates and incentives. - Increase conservation messaging (radio, TV, social media, educational events).
Level 3: Significant Shortage	≤30%	A Water Shortage Level 3: Significant Shortage is implemented when demand must be reduced up to 30% to ensure sufficient supplies. During a Significant Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and Level 1 and Level 2 conservation practices. Beginning with Water Shortage Level 3, LADWP may elect to withdraw from available emergency storage along the LAA system and from local groundwater basins. Emergency storage along the LAA may come in the form of emergency reservoir storage and/or emergency groundwater pumping in the Owens Valley with the approval of the LA/Inyo Standing Committee. Emergency

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		storage from local groundwater basin may come in the form of storied water credits. Withdrawals from emergency supplies may provide only short-term relief and the extent of withdrawals will be determined based on assessments of long-term shortage risk. **<u>Actions</u>** <u>Mandatory Conservation Phase 3</u> - Further restrictions on landscape irrigation watering days (Monday or Friday for odd-numbered street addresses and Sunday or Thursday for even-numbered street addresses) - Recommend use of pool covers to decrease water loss from evaporation. - Recommend washing of vehicles at commercial car wash facilities. - Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins.
Level 4: Severe Shortage	≤40%	Water Shortage Level 4: Severe Shortage is implemented when demand must be reduced up to 40% to ensure sufficient supplies. During a Severe Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and additional restriction practices that became mandatory under Water Shortage Level 1, Level 2, and Level 3. LADWP may also elect to increase withdrawals from available emergency

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		storage along the LAA system and from local groundwater basins. **<u>Actions</u>** <u>Mandatory Conservation Phase 4</u> - Further restrictions on landscape irrigation watering days (Monday for odd-numbered street addresses and Tuesday for even-numbered street addresses). - Mandate use of pool covers on all residential swimming pools when not in use. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins
Level 5: Critical Shortage	≤50%	Water Shortage Level 5: Critical Shortage is implemented when a water shortage emergency requires that demand be reduced up to 50% to ensure sufficient supplies. Mandatory conservation practices imposed under Water Shortage Levels 1 through 4 remain in effect and LADWP may elect to further increase withdrawals from available

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		emergency storage along the LAA system and from local groundwater basins. **<u>Actions</u>** <u>Mandatory Conservation Phase 5</u> - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees, during non-daylight hours and only to the extent necessary to maintain minimum levels of biological viability. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins
Level 6: Super Critical Shortage	> 50%	Water Shortage Level 6: Supercritical Shortage is implemented when a water shortage emergency requires that demand be reduced greater than 50% to ensure sufficient supplies. During a Supercritical Shortage, a new set of mandatory conservation measures takes effect, in addition to all Permanent Water Waste Prohibitions. Mandatory conservation practices that were imposed Levels 1 through 5 remain in effect. LADWP may elect maximize withdrawals from available emergency storage along the LAA system and from local groundwater basins for supply augmentation.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		Actions Mandatory Conservation Phase 6 - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees, during non-daylight hours and only to the extent necessary to maintain minimum levels of biological viability. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - The Board is hereby authorized to implement additional prohibited uses of water based on the water supply situation. Any additional prohibition shall be published at least once in a daily newspaper of general circulation and shall become effective immediately upon such publication and shall remain in effect until cancelled. - Withdraw from available emergency storage along the LAA and local groundwater basin. - Additional measures authorized by the Board
Source: 2020 UWMP, Appendix I, LADWP.		

Under state law, LADWP has the authority to implement the water shortage actions outlined in the WSCP. In all water shortage cases, shortage response actions to be implemented are at the discretion of LADWP based on an assessment of the supply

shortage, customer response, and the need for demand reductions. Upon proclamation by the Governor of a state of emergency under the California Emergency Services Action based on extended dry conditions, the state will defer to implementation of locally adopted water shortage contingency plans to the extent practicable. LADWP will coordinate with regional and local water suppliers for which it provided water supply services for possible proclamation of a local emergency, as necessary.

The Project would connect to the existing water conveyance infrastructure near the Project Site. As shown in Table XIX-1, the Project would consume a net increase of approximately 157 gallons of water per day. As discussed under Checklist topic XIV (Population and Housing), the Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. Based on its 2020 UWMP, LADWP has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry-year and multiple dry-year hydrologic conditions. The Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180,822 and in the LAGBC to conserve water usage. Additionally, the Project would be subject to any water shortage response actions identified by LADWP to ensure water service availability. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Table XIX-2 shows that the cumulative development (including the Project) could result in the consumption of 2,584 gallons of water per day (or 0.002 mgd). It should be noted that this amount does not take into account the net decrease in water consumption that would occur as a result of the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely substantially reduce the cumulative water consumption shown on Table XIX-2.

Through its 2020 UWMP, the City anticipates that its projected water supplies will meet demand through the year 2040. Applicants of development in the City are required to coordinate with the City to determine a project's anticipated water supply needs and the ability of the City to meet those needs. Additionally, all development in the City is required to incorporate water conservation measures outlined in the City's Green Building Code to minimize water consumption. Further, all water users in the City are subject to water restrictions in times of drought.

Given that the City is completely built out, and the related project is infill development that has replaced existing uses that currently consume water, it is likely that the City will have

adequate water supply to accommodate the related projects, and cumulative impacts on water supply would be less than significant. Also, as discussed previously, the Project would result in a net decrease in the demand for water supply and thus, the Project would not have the potential to contribute to any cumulative impact on water supply.

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

Less Than Significant Impact. As discussed in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment), Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Refer to the discussion of cumulative impacts in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The landfills that serve the City and the capacity of these landfills are shown in Table XIX-6. As shown, the landfills have an approximate available daily intake of 16,531 tons. As shown in Table XIX-7, the Project would generate a net increase of approximately 0.006 tons of solid waste per day. This total is a conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. With a remaining daily intake capacity of approximately 16,531 tons of solid waste per day, the landfills serving the City could accommodate the Project's approximately net increase of 0.006 tons of solid waste per day.

Table XIX-6
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	17	65.9	12,100	7,420	4,680
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Antelope Valley	13	10.1	3,600	2,785	815
Lancaster	81	9.8	3,000	395	2,605
Calabasas	14	1.0	3,500	955	2,545
				Total	**16,531**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2020 Annual Report, September 2021.

Table XIX-7
Estimated Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Self-Storage (Office)[2]	1,015 sf	0.005 lbs/day	0.002
Commercial/Retail	1,400 sf	25 gpd/1,000 sf	0.004
		Total	**0.006**

tpd = tons per day sf = square feet

[1] *http://www.calrecycle.ca.gov/wastechar/wastegenrates/*

[2] *The "self-storage" portion of the Project would not have large dumpsters for use by the customers. Thus, the solid generation for the self-storage portion of the Project is based on the associated "office" portion of the Project.*

Cumulative Impacts

Based on information provided by LADOT, there is one related project located within 0.5 miles of the Project Site at 20539 Ventura Boulevard (refer to Appendix C). Table XIX-8 shows that the cumulative development (including the Project) could result in the generation of 0.17 tons of solid waste per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removing existing uses or the effectiveness of the City's recycling program, both of which would likely substantially reduce the cumulative solid waste generation shown in

Table XIX-8. With the remaining available capacity of 16,531 tons per day, landfill capacity would be adequate to accommodate the Project. Therefore, cumulative impacts related to solid waste would be less than significant.

Table XIX-8
Estimated Cumulative Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Car Dealership	80,900 sf	4 lbs/day/1,000 sf	0.16
		Plus Project	*(0.006)*
		Total	**0.17**

tpd = tons per day du = dwelling unit sf = square feet

Note: Numbers might not add up due to rounding.

[1] *http://www.calrecycle.ca.gov/wastechar/wastegenrates/*

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

Less Than Significant Impact. The Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an Assembly Bill 939 (AB 939) Compliance Permit from the Los Angeles Bureau of Sanitation (LASAN). The Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the Project would be required to comply with CALGreen Code waste reduction measures for the operation of the Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. Thus, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste Therefore, no significant Project impacts related to this issue would occur.

Cumulative Impacts

All development in the City is required to comply with all applicable federal, state, and local statutes and regulations, including the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance related to solid waste generation. Therefore, cumulative impacts related to this issue would be less than significant.am

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan??

Less Than Significant Impact. The County of Los Angeles (County) identifies Ventura Boulevard, which is located just to the south of the Project Site, as a "Secondary Disaster Route" for emergency evacuation. The Project includes infill development of the Project Site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses within an urbanized area of the City, surrounded by established land use patterns and roadway and utility infrastructure. The Project does not include the development of any new roadways that would alter or interfere with existing emergency evacuation routes. During an evacuation and use of Ventura Boulevard, the Project would not have a large number of people at the site that would interfere with evacuation. Thus, the Project would

not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, Project impacts related to this issue would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire?

Less Than Significant Impact. The Project includes infill development of the Project Site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses within an urbanized area of the City, surrounded by established land use patterns and roadway and utility infrastructure. The Project would be required to comply with all fire protection and prevention requirements, including, but not limited to: inclusion of a fire suppression sprinkler system and smoke alarms, fire-rated walls, building setbacks, emergency access, and fire flow. As a self-storage facility and retail use, the Project is a relatively low-density use that does exacerbate wildfire risks. Thus, the Project would not expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, Project impacts related to this issue would be less than significant.

c) Requires 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 includes infill development of the Project Site with a 158,317-square-foot mixed-use building, which would include a 156,917-square-foot climate-controlled storage for household goods with a 1,015-square-foot associated office, 1,400 square feet of neighborhood-serving commercial/retail uses within an urbanized area of the City, surrounded by established land use patterns and roadway and utility infrastructure. Additionally, the Project operator would be required to comply with the City's Brush Clearance Requirements to prevent the spread of fire in the event of a wildfire. The Project would not require 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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 relatively flat. As in the existing condition, the Project's stormwater would drain to the existing storm drain system in Ventura Boulevard. The Project would not change the drainage pattern at the Project Site. The Project Site does not drain into any streams, and the site is not located on or near and areas susceptible to

landslides. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to 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, 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. For the reasons stated in this Initial Study, the Project would not have the potential to 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, or reduce the number or restrict the range of a rare or endangered plant or animal. With implementation of Mitigation Measures ARCHEO-1 and TCR-1 through TCR-6, the Project would not eliminate important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not cause substantial adverse effects on human beings, either directly or indirectly.

INITIAL STUDY

5 MITIGATION AND MONITORING PROGRAM

5.1 INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared according 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, which it has 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 (IS/MND) has been prepared for the Project that evaluates the Project's potential impacts, taking into consideration mitigation measures (MM) the Applicant has incorporated into the Project to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor the implementation of the MMs incorporated into the Project.

5.2 ORGANIZATION

As shown on the following pages, each MM incorporated into the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- **Enforcement Agency**: the agency with the power to enforce the MM.
- **Monitoring Agency**: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase**: the phase of the Project during which the MM shall be monitored.
- **Monitoring Frequency**: the frequency at which the MM shall be monitored.
- **Action Indicating Compliance**: the action by which the Enforcement or Monitoring Agency indicates that compliance with the incorporated MM has been implemented.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each incorporated MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each MM has

been implemented. The Applicant shall maintain records demonstrating compliance with each MM. Such records shall be made available to the City upon request.

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

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

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

5.5 MITIGATION MONITORING PROGRAM

Cultural Resources

ARCHEO-1: Inadvertent Discovery of Archaeological Resources

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

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

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

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

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

  - **Enforcement Agency**: Department of City Planning
  - **Monitoring Agency**: Department of City Planning
  - **Monitoring Phase**: Construction
  - **Monitoring Frequency**: Once during ground-distrubing activities; once after ground-distrubing activities
  - **Action Indicating Compliance**: Issuance of Grading Permit; Issuance of Building Permit

Geology and Soils

PALEO-1: If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded

on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

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

Tribal Cultural Resources

TCR-1: Prior to the start of construction, a Qualified representative, procured by the Fernandeño Tataviam Band of Mission Indians and retained by the Project Applicant, shall conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the aspects of Tribal Cultural Resources and the procedures for notifying the Fernandeño Tataviam Band of Mission Indians should Tribal Cultural Resources be discovered by construction staff. Training can be done in conjunction with Cultural Resources WEAP training, if such training is requested by the project's archaeologist.

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

TCR-2: A Treatment and Disposition Plan (TDP) shall be established, in consultation with the Fernandeño Tataviam Band of Mission Indians, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The TDP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. 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 Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Pre-construction
- **Monitoring Frequency**: Once before issuance of Grading Permit
- **Action Indicating Compliance**: Field inspection sign-off by Monitor

TCR-3: 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 Secretary of Interior standards retained by the project applicant shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this

assessment period. The Fernandeño Tataviam Band of Mission Indians shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment. The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground-disturbing activities.

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

TCR-4: 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 MLD, as determined by the NAHC, should those findings be determined as Native American in origin.

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

TCR-5: The Project Applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe the first (5) days of scheduled activities which include clearing, grubbing, and grading operations. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by project applicant, in writing, upon completion of each set of scheduled activities and 5 days notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request ground-disturbing activities cease within 60 feet of the discovery to assess and document potential finds in real-time. A qualified archaeologist meeting Secretary of Interior standards shall also assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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 Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Pre-construction; Construction
- **Monitoring Frequency**: Periodically during ground-disturbing activities

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

TCR-6: The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to spot-check all ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity once weekly for the total duration of such soil disturbing activities. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are completed. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by the project applicant, in writing, upon completion of each set of scheduled activities and 5 days notice shall be submitted to the Tribe by Client, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards, retained by the project applicant, as well as the Tribal Monitor, shall assess the find. 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 Fernandeño Tataviam Band of Mission Indians 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 Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Pre-construction; Construction
- **Monitoring Frequency**: Periodically during ground-disturbing activities
- **Action Indicating Compliance**: Issuance of Grading Permit; Field Inspection sign-off by Monitor

INITIAL STUDY

6 PREPARERS AND PERSONS CONSULTED

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