DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

9143 De Soto Self Storage Project

Environmental Case Number: ENV-2023-6313-MND

Site Plan Source: James Goodman Architecture, May 7, 2024

PREPARED FOR:

9143 De Soto Investments, LLC

8350 W. Sahara Avenue., Suite 210
Las Vegas, Nevada 89117
Contact: Mr. Matt Huss
Vice President / Chief Operating Officer
(702) 253-5751

LEAD AGENCY:

City of Los Angeles Department of City Planning

6262 Van Nuys Boulevard, Room 430
Los Angeles, CA 91401
Contact: Correy Kitchens, City Planner
(818) 374 - 5034

PREPARED BY:

ENVICOM CORPORATION

4165 E. Thousand Oaks Blvd., Suite 290
Westlake Village, CA 91362
Contact: Ms. Laura Kaufmann
VP, Environmental Services
(818) 879-4700

July 2024

9143 De Soto Self Storage Project

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Environmental Case Number:
ENV-2023-6313-MND

Lead Agency:

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
6262 Van Nuys Boulevard, Room 430
Los Angeles, CA 91401
Contact: Correy Kitchens, City Planning Associate
(818) 374-5034

Prepared for:

9143 DE SOTO INVESTMENTS, LLC
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July 2024

SECTION **PAGE NUMBER**

TABLES

FIGURES

APPENDICES

ACRONYMNS

AB	Assembly Bill
ADT	average daily traffic
AFY	acre-feet per year
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
BIOS	Biogeographic Information and Observation System
BMPs	Best Management Practices
CalEPA	California Environmental Protection Agency
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CHSC	California Health and Safety Code
City	City of Los Angeles
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
CUP	Conditional Use Permit (CUP)
CY	cubic yards
dB	decibels
EDR	Environmental Database Resources
EIR	Environmental Impact Report
°F	Fahrenheit
FAR	Floor Area Ratio
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
G-Line	Orange Line Busway
GHGs	Greenhouse gas
gpd	gallons per day
Healthy LA	Healthy LA
HFCs	hydrofluorocarbons
HVAC	heating, ventilation, and air conditioning
HWTS	Hazardous Waste Tracking System
kWh/year	kilowatt-hour per year
LADBS	Los Angeles Department of Building and Safety (LADBS)
LADOT	Los Angeles Department of Transportation (LADOT)
LAHM	Los Angeles Hazardous Materials
LAMC	Los Angeles Municipal Code
LASAN	Los Angeles Sanitation and Environment
LAWA	Los Angeles World Airports
L_{dn}	Day and Night
LID	Low Impact Development
LST	Localized Significance Thresholds (LST)
LT-1	Long-term Location 1

MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MND	Mitigated Negative Declaration
mph	mile per hour
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MT	metric tons
$MTCO_2e$	MT of carbon dioxide equivalents
MWh/year	megawatt-hours per year
N_2O	nitrous oxide
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NO	nitric oxide
NO_2	Nitrogen dioxide
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
PFCs	perfluorocarbons
PM	particulate matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
RCM	Regulatory Compliance Measure
RCNM	Roadway Construction Noise Model
RECs	Recognized Environmental Conditions
Regional Water Board	Los Angeles Regional Water Quality Control Board
RTP/SCS	2020-2045 Regional Transportation Plan/Sustainable Communities
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAR	Sewer Capacity Availability Request
SEAs	Significant Ecological Areas
sf	square feet
SF_6	sulfur hexafluoride
SLM	Sound Level Meters
SO_2	Sulfur dioxide
SoCalGas	Southern California Gas Company
SO_x	Sulfur oxides
SPR	Site Plan Review
SRA	state responsibility area
ST-1	Short-term Location 1
State Water Board	California Regional Water Quality Control Board
SVLRC	Simi Valley Landfill and Recycling Center
SWPPP	Stormwater Pollution Prevention Plan
TAG	Transportation Assessment Guidelines
tpd	tons per day
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	2020 Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone

VMT	vehicle miles traveled
VOCs	volatile organic compounds

1.0 INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration is to disclose, evaluate, and determine if mitigation is required for the environmental impacts of the 9143 De Soto Self Storage Project.

PROJECT SUMMARY

The 9143 De Soto Self Storage Project consists of the proposed construction, use, and maintenance of a new self-storage development that includes four separate buildings, one four-story storage building and three one-story storage buildings that total approximately 108,448 square feet (sf) of total floor area,[1] including one caretaker's residence, for self-storage the Chatsworth – Porter Ranch Community Plan area of the City of Los Angeles.

LEGAL AUTHORITY

As lead agency, the City of Los Angeles (City) prepared this Initial Study in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000–21189) and relevant provisions of the *CEQA Guidelines* (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387), as amended.

Initial Study. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

(1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND);
(2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
(3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 states a public agency shall prepare a negative declaration or MND for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
(b) The initial study identifies potentially significant effects, but:
    1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
    2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

An MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

[1] According to the Los Angeles Municipal Code (LAMC) Section 12.03, Floor Area is the area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, Outdoor Dining Areas, and Basement storage areas.

2.0 FINDINGS OF THIS INITIAL STUDY

The impact analysis in this Initial Study demonstrates that with the incorporation of mitigation measures, the 9143 De Soto Self Storage Project would have a less than significant impact on the environment with regard to all CEQA Environmental Checklist topics. For each topic addressed in Chapter 4.0, the impacts associated with development of this Project have been determined to be "Potentially Significant Unless Mitigation Incorporated," "Less than Significant," or "No Impact." For topics determined to be "Potentially Significant Unless Mitigation Incorporated," the mitigation measures identified would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

9143 De Soto Investments, LLC ("Applicant") proposes the 9143 De Soto Self Storage ("Project"). The Project consists of the proposed construction, use, and maintenance of a new self-storage development that includes four separate buildings, one four-story building and three one-story storage buildings that totals approximately 108,448 sf of total floor including one caretaker's unit. The proposed development would provide space for internalized self-storage. The proposed building includes associated customer and employee parking, site landscaping, signage, and exterior lighting for displays and security. Architectural plans are included as **Appendix A**.

3.1 LOCATION, ZONING, AND EXISTING USES

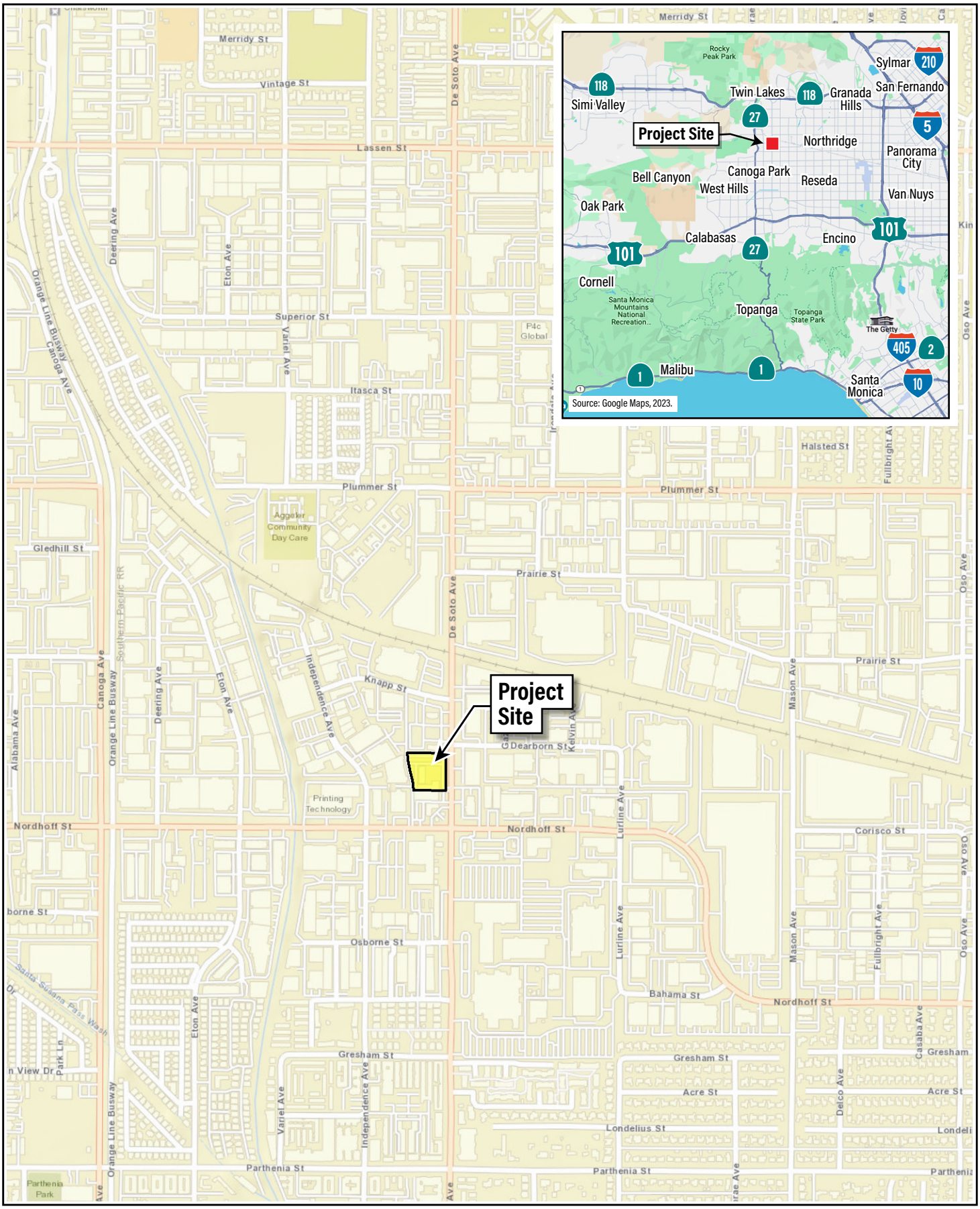
The Project is located in the Chatsworth – Porter Ranch Community Plan area of the City, as shown in **Figure 1, Regional Location Map**. The Project location is between Nordhoff Street and Knapp Street as shown in **Figure 2, Vicinity Map**. Street addresses associated with the Project location ("Project Site" or "Subject Property") are 9143 and 9129 De Soto Avenue, Chatsworth, California, 91311 on Assessor Parel Number 2746-009-023. The net site area of the Subject Property is approximately 79,705 sf (1.83 acres).[2]

The Chatsworth – Porter Ranch Community Plan designates the Subject Property for Highway Oriented Commercial uses. The Property is currently zoned (T)(Q)C2-1 as a result of a 2018 land use entitlement approval, which changed the underlying zoning from MR2-1 (Restricted Light Industrial Zone) and P-1 (Automobile Parking Zone). Ordinance No. 185585 memorializes the Qualified Conditions of Approval associated with the entitlement (Case No. APCNV-2017-1848-ZC-WDI; ENV-2017-1849-CE; ORD-185585), which also added a "T" Classification to the zoning. However, any project under this entitlement has been abandoned, the former buildings have been demolished, and the Property is vacant and cleared of prior development features. Accordingly, the Property will revert to the underlying zoning designations on July 16, 2024. So, the underlying zoning of the Subject Property is MR2-1 and P-1. The Project Site is a potential Buffer Zone Property which means any property designated as border zone property pursuant to Section 25529 of the California Health and Safety Code (CHSC) which is within 2,000 feet of a significant disposal of hazardous waste, and the wastes so located are a significant existing or potential hazard to present or future public health or safety on the land in question. Section 25117.4 of the CHSC, land use is not restricted until the Department of Toxic Substance Control serves notice upon the owner and the City it is considering designating the property as a Buffer Zone Property. The Subject Property is also within the Los Angeles State Enterprise Zone and within a Transit Priority Area. The Subject Property is also within the Chatsworth – Northridge Industrial Core.

The Subject Property is currently a vacant lot that formerly contained a gym/fitness facility. Surrounding properties to the north, east, and south are zoned MR2-1 and C2-1 and designated for light manufacturing and Highway Oriented Commercial land uses in the Chatsworth – Porter Ranch Community Plan. The Project Site is also located in a Transit Priority Area, and is accessible by pedestrian travel, bicycle, and public transit.[3]

- Properties to the north are zoned (T)(Q) C2-1 and consists of neighborhood-serving retail and restaurants with surface parking.
- Properties to the east, along De Soto Avenue, are zoned (T)(Q) C2-1 and MR2-1/P-1 and consists of self-storage facility, gas station, restaurant and light manufacturing building.

[2] M & G Civil Engineering and Land Surveying, ATLA/NSPS Land Title Survey 9143 De Soto Avenue, Chatsworth, CA 91311, Revised February 9, 2023.
[3] City of Los Angeles, ZIMAS, Accessed on January 16, 2024 at: http://zimas.lacity.org/.



Source: ESRI, World Street Map Background Imagery, 2023.

envicom

Regional Location Map

FEET 0 500 1,000

FIGURE 1

Source: Google Earth Pro, May 29, 2022.

envicom

Vicinity Map

FEET 0 50 100

FIGURE 2

- Properties to the south are zoned (T)(Q) C2-1 consist of a neighborhood-serving retail and restaurants, and the adjacent commercial building is vacant.
- Properties to the west, adjacent to the Project Site, consists of multiple light industrial buildings.

3.2 PROJECT COMPONENTS

The Applicant requests approvals for the construction, use, and maintenance of a self-storage development with a primary use for the storage of household goods. The proposed four-story building reaches a maximum height of 51'-3" feet and includes 22 automobile parking spaces (including one ADA parking space). A preliminary site plan is shown in **Figure 3, Proposed Site Plan**. Proposed hours of operation are as follows:

- Self-storage Customer Service Hours (staffed): Monday through Sunday, 9:30 AM to 6:00 PM;
- Self-storage Gate Hours: Sunday through Saturday, 6:00 AM to 10:00 PM.

The proposed development includes self-storage units in all four buildings including all four floor levels of Building A, as well as customer service room and a lobby on Building A. Buildings B, C and D provide extended access storage.

The primary use of the Project is the storage of household goods also known as "self-storage". The Project will redevelop an underutilized and restricted, commercially zoned property with a new community-serving use. Public convenience will be served by the addition of a viable commercial development to meet the growing market demand for household storage. Storage buildings for household goods are beneficial to areas with many multifamily residential dwelling units, such as the area to the south of the Project site along De Soto Avenue, because they provide additional storage space. The scale of the storage building is compatible with other commercial developments on De Soto Avenue and Nordhoff Street, which are major highways and include commercial shopping centers, light manufacturing, and auto-related uses. The size of the proposed building area is provided below in **Table 3-1, Floor Area**.

As shown in Table 3-1, the Project proposes 108,448 sf of floor area (calculated pursuant to LAMC Section 12.03); therefore, the proposed new building would result in an increase of 108,448 sf in floor area on the Project Site. To analyze the full physical impact of the Project on the environment, this document refers to the total floor area of 108,448 sf shown in Table 3-1.

The proposed building will be sustainably designed to meet or exceed applicable City building codes and Building Energy Efficiency Standards - Title 24 ("Title 24") specified in the California Code of Regulations (CCR). As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, low flow fixtures, non-Volatile Organic Compound paints/adhesives, drought tolerant planting, and high-performance building envelopment.

3.3 PARKING, ACCESS, AND CIRCULATION

Two driveways connect the Project Site to De Soto Avenue and will provide vehicular ingress and egress to the Project Site for access. The new Project driveways will be located different locations of the existing driveway. Pursuant to AB 2097, though no parking is required, automobile parking is provided in a surface parking lot with 22 spaces (including one ADA space) that are located on the southern portion of the Project on the northern side of Building A, as shown in Figure 3, Proposed Site Plan. The Project will provide 8 short-term and 8 long-term spaces for bicycle parking.

Source: James Goodman Architecture, May 7, 2024.

Proposed Site Plan

FEET 0 18 36

FIGURE 3

Table 3-1
Floor Area

Floor	Area (sf)
Proposed Floor Area	
Building A	
1st Floor	15,874
2nd Floor	16,633
3rd Floor	24,384
4th Floor	24,384
Building A Sub-Total	81,274
Building B	
1st Floor	9,387
Building B Sub-Total	9,387
Building C	
1st Floor	9,387
Building C Sub-Total	9,387
Building D	
1st Floor	8,400
Building D Sub-Total	8,400
Total Floor Area	**108,448**
Source: James Goodman Architecture, Final Initial Plan Set, 2213-SD11.1, January 5, 2024.	

3.4 CONSTRUCTION

The existing project site is currently vacant so construction would not include demolition. A preliminary estimate of the duration for each phase of construction and off-road equipment needed is provided in **Table 3-2, Construction Assumptions**.

Table 3-2
Construction Assumptions

Phase	Duration	Equipment Type	Number of pieces
Site Preparation	2 days	Graders	1
		Rubber Tired Dozers	1
		Tractor/Loader/Backhoes	1
Grading	4 days	Graders	1
		Rubber Tired Dozers	1
		Tractors/Loaders/Backhoes	2
Building Construction	200 days	Cranes	1
		Forklift	1
		Generator Sets	1
		Welders	3
		Tractors/Loaders/Backhoes	1
Paving	10 days	Cement and Mortar Mixer	1
		Paver	1
		Paving Equipment	1
		Rollers	1
		Tractor/Loader/Backhoe	1
Architectural Coating	20 days	Air Compressor	1

As shown in Table 3-2, construction necessitates the use of off-road earth moving equipment such as dozers, forklifts, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery. The Subject Property has sufficient space for temporary construction crew parking and equipment staging to take place on site during all phases of construction, thereby minimizing the interference of construction vehicles with existing vehicle circulation. The grading phase of construction would result in import of 1,320 cubic yards (CY) of soil. To minimize the impact of temporary construction activity on the performance of the local circulation system and adjacent uses, Project Design Feature (PDF)-1 requires the preparation of a Construction Traffic Management Program.

PDF-1 Construction Traffic Management Program: A Construction Traffic Management Program, including but not limited to, lane closure or modification information, hauling, staging, and temporary access and parking plans, as necessary, shall be prepared by the Project construction contractor and submitted to the City for review and approval. The Construction Traffic Management Program shall convey the specific actions of the construction process, with focus on the activities that may potentially affect off-site rights-of-way. The Construction Traffic Management Program shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Construction vehicle and equipment parking or staging on surrounding public streets shall be minimized to the extent feasible.
- Temporary vehicular traffic controls (such as signage and/or flag persons) during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways shall be implemented.
- Safety precautions for pedestrians and bicyclists, through such measures as signage and protection barriers, shall be implemented, as appropriate.
- Construction-related activities (such as deliveries and/or hauling) shall be scheduled to occur outside the commuter peak hours.
- To avoid structural damage related to construction period vibration, loaded trucks shall be prohibited from operating within 15 feet of off-site structures.

REQUIRED APPROVALS

The Applicant is requesting the following entitlements and approvals from the City as Lead Agency under CEQA:

- **Zone Change.** Pursuant to Los Angeles Municipal Code (LAMC or "Code") Sections 12.32.F, a Zone Change from MR2-1 and P-1 to C2-1 to allow for the proposed of commercial project.
- **Conditional Use Permit (CUP).** Pursuant to LAMC Section 12.24.W.50, a CUP to allow a self-storage building in the proposed C2-1 Zone.
- **Site Plan Review (SPR).** Pursuant to LAMC Section 16.05, to permit the construction, use, and maintenance of a commercial project that results in an increase of floor area.

Pursuant to various LAMC sections, the Applicant will request approvals and permits from the Department of Building and Safety and other municipal agencies for Project construction actions which may include, and not be limited to excavation, shoring, grading, haul route, foundation, and building and tenant improvements.

4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

1. **Project title:**
   9143 De Soto Self Storage Project
2. **Lead agency name and address:**
   City of Los Angeles
   Department of City Planning
   200 N. Spring Street
   Los Angeles, CA 90012
3. **Contact person and phone number:**
   Correy Kitchens, City Planning Associate
   Dept. of City Planning
   6262 Van Nuys Boulevard, Room 430
   Los Angeles, CA 91401
   (818) 374-5034
4. **Project location:**
   9129 - 9143 De Soto Avenue, Los Angeles, CA 91311
5. **Project sponsor's name and address:**
   9143 De Soto Investments, LLC
   8350 W. Sahara Ave., Suite 210
   Las Vegas, NV 89117
6. **General plan land use designation:**
   Highway Oriented Commercial
7. **Zoning:**
   Existing: (T)(Q)C2-1with underlying zoning MR2-1 and P-1. Proposed: C2-1
8. **Description of project:**
   Construct, use, and maintain a new four-story building and three single-story self-storage buildings that total approximately 108,448 sf of total floor area for self-storage use in the Chatsworth – Porter Ranch Community Plan Area of the City of Los Angeles.
9. **Surrounding land uses and setting:**
   Existing commercial uses zoned (T)(Q)C2-1 to the north of the Subject Property, De Soto Avenue existing light industrial and commercial uses zoned MR2-1/P-1 and (T)(Q)C2-1 to the east, existing commercial uses zoned (T)(Q)C2-1 to the south, and adjacent light industrial uses zoned MR2-1 to the west.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
    The City of Los Angeles is the only approval agency at this time.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles Department of City Planning		**COUNCIL DISTRICT: 12** Councilmember John Lee
PROJECT TITLE: 9143 De Soto Self Storage Project	**ENVIRONMENTAL CASE:** ENV-2023-6313-MND	**CASE NO.** Case No. CPC-2023-6312-ZC-CU-SPR

PROJECT LOCATION: 9129 - 9143 De Soto Avenue, Los Angeles, CA 91311

PROJECT DESCRIPTION: Construct, use, and maintain a new four-story building and three single-story self-storage buildings that total approximately 108,448 sf of total floor area for self-storage use in the Chatsworth – Porter Ranch Community Plan Area of the City of Los Angeles.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
9143 De Soto Investments, LLC
8350 W. Sahara Ave., Suite 210
Las Vegas, NV 89117
Contact: Matt Huss; Vice President/Chief Operating Officer
(702) 253-5751

FINDING:
The Department of City Planning of the City of Los Angeles proposes that a Mitigated Negative Declaration be adopted for this Project because the mitigation measures outlined in the attached pages will reduce any potential significant adverse effects to a less than significant level.

(continued on next page)

SEE ATTACHED SHEETS FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response for the Lead City Agency. The Project decision-makers may adopt the Mitigated Negative Declaration, amend it, or require preparation of an Environmental Impact Report (EIR). Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM Correy Kitchens	**TITLE** City Planning Associate	**TELEPHONE NUMBER** (818) 374-5034
ADDRESS City of Los Angeles Dept. of City Planning 6262 Van Nuys Boulevard, Room 430 Los Angeles, CA 91401	**SIGNATURE (Official)** Correy Kitchens, City Planning Associate	**DATE**

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

<table>
<tr><td colspan="2">LEAD CITY AGENCY:
City of Los Angeles</td><td colspan="2">COUNCIL DISTRICT: 12
Councilmember John Lee</td><td>DATE:</td></tr>
<tr><td colspan="5">RESPONSIBLE AGENCIES: N/A</td></tr>
<tr><td colspan="2">ENVIRONMENTAL CASE:
ENV-2023-6313-MND</td><td colspan="3">RELATED CASES:
CPC-2023-6312-ZC-CUP-SPR</td></tr>
<tr><td colspan="2">PREVIOUS ACTIONS CASE NO.</td><td colspan="3">☐ DOES have significant changes from previous actions.
☒ DOES NOT have significant changes from previous actions.</td></tr>
<tr><td colspan="5">PROJECT DESCRIPTION: Construct, use, and maintain a new four-story building and three single-story self-storage buildings that total approximately 108,448 sf of total floor area for self-storage use in the Chatsworth – Porter Ranch Community Plan Area of the City of Los Angeles.</td></tr>
<tr><td colspan="5">ENV. PROJECT DESCRIPTION: See Section 3.0., Project Description.</td></tr>
<tr><td colspan="5">ENVIRONMENTAL SETTING: The Project Site encompasses 1.83-acres in the Chatsworth – Porter Ranch Community Plan area of the City. Existing commercial uses zoned (T)(Q)C2-1 to the north of the Subject Property, De Soto Avenue existing light industrial and commercial uses zoned MR2-1/P-1 and (T)(Q)C2-1 to the east, existing commercial uses zoned (T)(Q)C2-1 to the south, and adjacent light industrial uses zoned MR2-1 to the west.</td></tr>
<tr><td colspan="5">PROJECT LOCATION: 9129 - 9143 De Soto Avenue, Los Angeles, CA 91311</td></tr>
<tr><td colspan="2">COMMUNITY PLAN AREA:
Chatsworth – Porter Ranch

STATUS:
☐ Preliminary
☒ Proposed</td><td colspan="2">☒ Does Conform to Plan
☐ Does NOT Conform to Plan</td><td>AREA PLANNING COMMISSION:
North Valley</td><td>CERTIFIED NEIGHBORHOOD COUNCIL:
Chatsworth</td></tr>
<tr><td>EXISTING ZONING:
MR2-1</td><td colspan="2">MAX DENSITY ZONING:
The 1 Height District permits a maximum height of 75 feet, six stories, and a Floor Area Ratio (FAR) of 1.5:1.</td><td colspan="3"></td></tr>
<tr><td>GENERAL PLAN LAND USE:
Commercial</td><td colspan="2">MAX. DENSITY PLAN:
Maximum height of 75 feet, six stories, and a Floor Area Ratio (FAR) of 1.5:1.</td><td colspan="3"></td></tr>
</table>

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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. Therefore, an EIR Addendum will be prepared.

Name: Correy Kitchens
Title: City Planning Associate
Dept. of City Planning, City of Los Angeles

Signature: _____ Date: _____

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). 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?	☐	☐	☒	☐

Impact Analysis

a. No Impact. A significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista, or substantially blocks views of a scenic vista. There are two types of scenic vistas: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). The Project Site is located within the urbanized visual setting of Chatsworth – Porter Ranch Community Plan area. The Chatsworth – Porter Ranch Community Plan does not designate scenic vistas, such as wide natural open spaces, parks, or viewsheds from hiking trails, within the vicinity. Nor does it establish focal views to be protected within the vicinity. Therefore, the Project would not introduce incompatible visual elements within a designated scenic vista or substantially block views of a designated scenic vista, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if scenic resources within a state scenic highway would be damaged or removed by development of a project. The Project Site is not located along a designated or eligible state scenic highway and does not contain scenic resources such as trees, rock outcroppings or historic buildings. The site is currently vacant and largely cleared of development. The closest eligible state scenic highway to the Project Site is Route 118 located approximately 2.5 miles north of the Project Site.[4] The Project Site may be visible from Route 118 but due to distance and intervening terrain and development, the proposed development would not damage the existing viewshed. Additionally,

[4] Caltrans, California State Scenic Highway System Map, Accessed on January 29, 2024 at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

the Project would not damage scenic resources such as trees, rock outcroppings, or historic buildings. Therefore, the Project would result in a less than significant impact to scenic resources within a state scenic highway.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a project introduced incompatible visual elements on the site or visual elements incompatible with the character of the area surroundings. Projects in urbanized areas could have a significant impact if they conflicted with applicable zoning and other regulations governing scenic quality. The Project is located in an urbanized, commercial and industrial area. Views in the vicinity of the Project Site are largely constrained by adjacent structures within an urban setting.

The development would be an infill development on a vacant lot located on De Soto Avenue. The development of the self-storage development would be four separate buildings, with Building A at four-stories and Building B, C and D at one-story. The maximum height of the building is 51'-3" feet. De Soto Avenue is a major highway and includes one- and two-story commercial and light industrial uses in the immediate vicinity of the Project Site. The scale of the proposed building is compatible with the other commercial developments along De Soto Avenue and the height is similar to nearby developments along Canoga Avenue. The development would include parking, loading areas, lighting, and trash collection that would conform to the City's Municipal Code. The proposed landscaping for the Project Site would consists of various trees and plants. The Department of City Planning would review the proposed landscape plan during the plan check process prior to issuance of building permit. Installation of landscaping around the site perimeter, which currently contains no landscaping, would improve the aesthetics from public viewpoints along De Soto Avenue and neighboring facilities.

The Project includes walls that could provide space for graffiti and vandalism. Pursuant to Los Angeles Municipal Code (LAMC) Section 91.8104.15, the Project would be required to maintain the exterior free from graffiti that could be visible from a public street or alley.

The Project would be of similar scale, mass, land use, and density as existing commercial and light industrial uses within the vicinity. Therefore, the Project would not introduce an incompatible visual element and would be consistent with applicable zoning codes and regulations governing scenic quality, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare that would be incompatible with the surrounding areas, or that pose a safety hazard to motorists on adjacent streets or freeways. Determining whether a proposed project results in a significant nighttime illumination impact must consider the change in ambient illumination levels resulting from proposed sources and the extent to which proposed lighting would spill off a project site and affect adjacent light-sensitive areas.

The Project Site is located in an urbanized area with existing nighttime lighting from streetlights along De Soto Avenue. Other sources of existing nighttime lighting include nearby commercial and light industrial buildings, and parking lots. The Project would include nighttime lighting limited to the amount necessary to safely illuminate building entrances, stairs and walkways for adequate night visibility and security. The Project would be designed with light fixtures that are facedown to limit light spillovers. Therefore, light impacts would be less than significant.

Nighttime glare can occur from car lights, streetlights and other lights on buildings, walkways and parking areas. Daytime glare can result from buildings with glass exteriors or reflective surfaces. As a regulatory requirement, the Department of City Planning will review the material selection of the building exteriors shown on the architectural plans to ensure the exteriors are constructed of materials with high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare. The trees in the proposed landscape plan would provide additional screening. Vehicle headlights from vehicles on the proposed at-grade parking level would be concealed by the building exterior and landscape improvements around the Project Site perimeter. Therefore, glare impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES.				
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?	☐	☐	☐	☒

Impact Analysis

a-e. No Impact. The Project Site is located in an urbanized area within the Chatsworth – Porter Ranch Community Plan, was previously developed and is zoned Restricted Light Industrial. The Project site is not located within designated prime farmland, farmland of statewide or local importance, unique farmland or grazing land on the Los Angeles County Important Farmland map prepared by the California Department of Conservation for the Farmland Mapping and Monitoring Program.[5] The Project Site is currently not used for agricultural purposes. The Project Site is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and is not located within a national forest or on forest land. Further, the Project Site is not enrolled in an existing Williamson Act Contract.[6] Therefore, the Project would have no impact on agricultural or forestry resources.

Mitigation Measures: No mitigation measures are required.

[5] California Department of Conservation, California Important Farmland Finder, Accessed November 3, 2023 at: https://maps.conservation.ca.gov/dlrp/ciff/

[6] California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, 2017.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Background

The Project site is located within the South Coast Air Basin ("Air Basin"). The Air 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 San Diego County to the South. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating stationary sources of emissions in the Air Basin.

Within the Air Basin, the agency to develop the regional Air Quality Management Plan (AQMP) is the SCAQMD, in coordination with the Southern California Association of Governments (SCAG). The SCAQMD's 2022 AQMP is the region's applicable air quality plan. While SCAG has recently adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities (RTP/SCS), which is pending state approval, growth estimates used to prepare the AQMP are derived from the SCAG 2020-2045 RTP/SCS. Subsequent updates of the AQMP will utilize growth estimates from the updated RTP/SCS, once state-approved. The Project does not change the land-use designation or zoning of the Project Site, and therefore, does not affect the assumptions that the AQMP is based upon.

However, the Project's consistency with the AQMP is primarily based upon its consistency with SCAQMD's project impact evaluation thresholds. The SCAQMD significance thresholds were established to assess regional and localized impacts of project-related criteria pollutant emissions, and non-exceedance of these thresholds demonstrates consistency with the AQMP. Conflict with these thresholds is assessed below.

The criteria pollutants for which federal and State standards have been promulgated and that are most relevant to air quality planning and regulation in the Basin are ozone (O_3), and fine suspended particulate matter (PM). These and other common air pollutants are briefly described below.

- Typically formed in the atmosphere, O_3 occurs when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of sunlight. As such, emissions of VOCs and NO_X are considered to be O_3 precursors. Concentrations of O_3 are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the subgroups most susceptible to O_3 effects. Short-term exposures (lasting for a few hours) to O_3 at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Particulate Matter PM-10 and PM-2.5 consists of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively, that can lodge in the lungs when inhaled. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Inhaled particulate matter can contribute to respiratory problems and can cause permanent lung damage. Inhalable particulates can also have a damaging effect on health by interfering with the body's mechanism for clearing the respiratory tract or by acting as a carrier of an absorbed toxic substance.
- Carbon Monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.
- Nitrogen dioxide (NO_2) is a compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X, a major contributor to O_3 formation. NO_2 also contributes to the formation of PM-10. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 parts per million (ppm).
- Sulfur dioxide (SO_2) is a toxic gas produced largely by the burning of sulfur-bearing fossil fuels. Sulfur oxides (SO_x) are a group of molecules made of sulfur and oxygen atoms and are pollutants that contribute to the formation of acid rain and particulate pollution. SO_2 is the component of greatest concern and is used as the indicator for all gaseous sulfur oxides. Volcanoes are a natural source of sulfur oxides, but 99 percent of the SO_2 in the atmosphere comes from human activity, such as burning coal, oil, and gas. The sulfur in coal and oil combine with oxygen when burned to make sulfur oxides. Processing mineral ores that contain sulfur and industrial burning of fossil fuels are also sources of SO_x in the atmosphere.

A summary of these major criteria pollutants of concern and their effects on public health is provided in **Table III-1, Health Effects of Major Criteria Pollutants**.

Table III-1
Health Effects of Major Criteria Pollutants

Pollutants	Sources	Primary Health Effects
Carbon Monoxide (CO)	• Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves	• Chest pain in patients with heart disease • Headache • Light-headedness • Reduced mental alertness
Nitrogen Dioxide (NO_2)	• See CO sources	• Lung irritation • Enhanced allergic responses
Ozone (O_3)	• Motor vehicles • Industrial emissions • Consumer products Note: These sources emit NOx and VOC which are precursors for the formation of O_3 in the atmosphere when they react with sunlight.	• Respiratory symptoms • Worsening of lung disease leading to premature death • Damage to lung tissue
Particulate Matter (PM-10)	• Cars and trucks (especially diesels) • Fireplaces, woodstoves • Windblown dust from roadways, agriculture and construction	• Premature death & hospitalization, primarily for worsening of respiratory disease
Particulate Matter (PM-2.5)	• Cars and trucks (especially diesels) • Fireplaces, woodstoves • Windblown dust from roadways, agriculture and construction	• Premature death • Hospitalization for worsening of cardiovascular disease • Hospitalization for respiratory disease • Asthma-related emergency room visits, increased symptoms, increased inhaler usage
Sulfur Oxides (SO_x)	• Burning of coal and oil • Refining oil • Ore and metal processing	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits.
Sources: California Air Resources Board, Sources of Air Pollution, Accessed on January 23, 2024 at: https://ww2.arb.ca.gov/resources/sources-air-pollution, and Common Air Pollutants at: https://ww2.arb.ca.gov/resources/common-air-pollutants		

Baseline Air Quality

The USEPA has set primary national ambient air quality standards (NAAQS) for O_3, CO, NO_2, SO_2, PM-10, and PM-2.5. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, the State has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards. **Table III-2, Federal and State Ambient Air Quality Standards**, lists the current federal and State standards for regulated pollutants.

Table III-2
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Standards	California Standards
Ozone (O_3)	1 Hour	-	0.09 ppm
	8 Hour	0.07 ppm	0.07 ppm
Carbon Monoxide (CO)	8 Hour	9.0 ppm	9.0 ppm
	1 Hour	35 ppm	20 ppm

Pollutant	Averaging Time	Federal Standards	California Standards
Nitrogen Dioxide (NO_2)	Annual	0.053 ppm	0.030 ppm
	1 Hour	0.10 ppm	0.18 ppm
Sulfur Dioxide (SO_2)	24 Hour	0.14 ppm	0.04 ppm
	1 Hour	0.075 ppm	0.25 ppm
Particulate Matter (PM-10)	Annual	-	20 µg/m^3
	24 Hour	150 µg/m^3	50 µg/m^3
Fine Particulate Matter (PM-2.5)	Annual	12 µg/m^3	12 µg/m^3
	24 Hour	35 µg/m^3	–
Source: California Air Resources Board, California and National Ambient Air Quality Standards, 2016, Accessed on January 23, 2023 at: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf Notes: ppm = parts per million; µg/m3 = micrograms per cubic meter			

Data on existing air quality in the Los Angeles County portion of the Air Basin is available from the California Air Resources Board (CARB), as measured at various monitoring locations. The monitoring station located closest to and most representative of air quality at the Project site is the Reseda Monitoring Station, located at 18330 Gault Street, approximately 4.1 miles southeast of the Project site. **Table III-3, Project Area Air Quality Monitoring Summary 2028-2022**, summarizes the annual air quality data from 2018–2022 in the local airshed for the criteria pollutants of greatest concern. Not all applicable pollutants are measured at the Reseda Monitoring Station, so measurements for O3, NOx, CO, and PM-2.5 measurements shown in Table III-3 were taken at 18330 Gault Street and PM-10 data is taken from Santa Clarita-Placerita Monitoring Station at 22224 Placerita Canyon, Santa Clarita (approximately 10.7 miles north of the Project Site).

Table III-3
Project Area Air Quality Monitoring Summary 2018-2022

Pollutant/Standard	2018	2019	2020	2021	2022
Ozone					
Number of Days Standards Exceeded					
1-Hour > 0.09 ppm (S)	14	1	14	4	7
8-Hour > 0.07 ppm (S)	49	6	49	31	23
8- Hour > 0.075 ppm (F)	23	4	23	16	11
Maximum Observed Concentration					
Max. 1-Hour Conc. (ppm)	0.120	0.101	0.142	0.110	0.110
Max. 8-Hour Conc. (ppm)	0.101	0.087	0.115	0.083	0.078
Carbon Monoxide					
Number of Days Standards Exceeded					
8-Hour > 9.0 ppm (S, F)	0	0	0	0	0
Maximum Observed Concentration					
Max 8-Hour Conc. (ppm)	2.1	2.2	1.7	1.9	1.8
Nitrogen Dioxide					
Number of Days Standards Exceeded					
1-Hour > 0.18 ppm (S)	0	0	0	0	0
Maximum Observed Concentration					
Max. 1-Hour Conc. (ppm)	0.057	0.064	0.057	0.054	0.055

Pollutant/Standard	2018	2019	2020	2021	2022
Inhalable Particulates (PM-10)					
Number of Days Standards Exceeded/Days Monitored					
24-Hour > 50 μg/m^3 (S)	0/54	1/60	0/36	0/60	0/61
24-Hour > 150 μg/m^3 (F)	0/54	0/60	0/36	0/60	0/61
Maximum Observed Concentration					
Max. 24-Hr. Conc. (μg/m^3)	49	62	48	47	36
Ultra-Fine Particulates (PM-2.5)					
Number of Days Standards Exceeded/Days Monitored					
24-Hour > 35 μg/m^3 (F)	0/106	0/118	0/116	3/120	0/121
Maximum Observed Concentration					
Max. 24-Hr. Conc. (μg/m^3)	31.0	30.0	27.6	55.5	20.5

Source: SCAQMD, Historical Data by Year, Air Quality Data Tables downloaded from: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year.

Note: Not all air monitoring stations measure for each criteria pollutant so data in the table are taken from the nearest monitoring station that provides measurements for each pollutant. Ozone, Carbon Monoxide, Nitrogen Dioxide, and PM-2.5 data is taken from Reseda Monitoring Station and PM-10 is taken from Santa Clarita-Placerita Monitoring Station.

As shown in Table III-3, levels exceeded the 1-hour State O_3 standards on 40 days between 2018-2022 and exceeded 8-hour federal standards on 77 days within the same time period. PM-10 levels exceeded the State 24-hour standard on one day in 2018-2022, and the National 24-hour PM-10 standard was not exceeded. PM-2.5 levels exceeded federal 24-hour standards on two days from 2018-2022, and CO and NOx levels measured from 2018-2022 did not exceed national or State standards.

Impact Analysis

Project-related air quality emission data was obtained using the California Emissions Estimator Model (CalEEMod 2022.1.1.21). The SCAQMD developed CalEEMod to calculate construction and operational emissions. The model calculates both the daily maximum and annual average emissions for criteria pollutants. The following analysis is based on CalEEMod output sheets dated January 5, 2023, provided in **Appendix B**. The CalEEMod data is based on the site plans from March 20, 2024. Since the revised site plan reduced the proposed development by 385 sf, actual air quality impacts of the project would be reduced over those evaluated here. The project impacts would be less than significant, even with the calculations being conservatively high.

a. Less than Significant Impact. A significant air quality impact could occur if a project would conflict with or obstruct the applicable air quality plan, which is the SCAQMD 2022 AQMP. The AQMP outlines the integrated air pollution measures needed to meet the NAAQS for O_3 and particulates. The governing board of the SCAQMD adopted the most recent version of the 2022 AQMP in December 2022.[7] Planning strategies for reducing emissions and achieving ambient air quality standards are developed using demographic growth projections (regional population, housing, and employment) generated by the Southern California Association of Governments.

The Project proposes to redevelop the site with four self-storage buildings consisting of self-storage units and parking. The Project would be consistent with the Chatsworth – Porter Ranch Community Plan land use designation of commercial use and would not create housing or otherwise lead to substantial population growth in the vicinity. Therefore, the Project would be consistent with regional population growth projections by the Southern California Association of Governments. See Section XI., Land Use and Planning, for further land use plan consistency analysis.

[7] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, adopted December 6, 2023.

The Project's consistency with the AQMP is primarily based upon its consistency with SCAQMD's project impact evaluation thresholds. The SCAQMD significance thresholds were established to assess regional and localized impacts of project-related criteria pollutant emissions, and non-exceedance of these thresholds demonstrates consistency with the AQMP. As the amount of a secondary pollutant that may result from a project cannot be quantified by direct measurement of its emissions from a source, the SCAQMD has designated significant emissions levels of precursor components as surrogates for evaluating whether a project's emissions could result in significant regional air quality impacts associated with secondary pollutants. The SCAQMD has designated levels for evaluating the significance of air quality impacts under CEQA shown in **Table III-4, SCAQMD Daily Emissions Thresholds**.

Table III-4
SCAQMD CEQA Daily Emissions Thresholds

Pollutant	Construction	Operations
ROG	75	55
NO_X	100	55
CO	550	550
PM-10	150	150
PM-2.5	55	55
SO_X	150	150
Source: SCAQMD CEQA Air Quality Significance Thresholds, Revision March 2023.		

Projects with maximum daily emissions that exceed the thresholds for construction or operations shown in Table III-4 are considered to have a potentially significant air quality impact under CEQA.

Construction Emissions

CalEEMod considered the following Project characteristics in estimating construction emissions. Construction activities would consist of the construction. The Project would consist of four storage buildings, one four-story building and three single-story buildings. Project Site grading would require import of approximately 1,320 CY of soil. The proposed self-storage use would comprise approximately 124,641 sf of gross area. Additionally, the Project would include a paved surface parking lot with spaces for 22 vehicles. A detailed list of the construction equipment and duration of each construction phase is provided in Section 3.0., Project Description. **Table III-5**, **Maximum Daily Construction Emissions**, provides the calculated peak daily construction emissions for the Project.

Table III-5
Maximum Daily Construction Emissions

Emissions (lbs/day)						
	ROG	**NO_X**	**CO**	**SO_2**	**PM-10**	**PM-2.5**
Construction Emissions[(a)(b)]	58.1	19.7	17.5	<0.1	4.4	2.3
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod 2022.1.1.21 Output in Appendix B.
[(a)] Construction emissions estimates reflect required compliance with SCAQMD Rule 403 for reducing construction dust emissions.
[(b)] Emissions reflect the maximum from summer or winter operational emissions.

The Project would be required to comply with SCAQMD Rule 403, Fugitive Dust. This rule aims to reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources. The Project would be required to comply with Rule 403 by applying the best available control measures, including watering the soil during construction, to minimize air pollutants released during the movement

of the soil and discontinuing clearing, earth moving, or excavation activities during periods of high winds (i.e., greater than 15 miles per hour), to prevent excessive dust.

As shown in Table III-5, peak daily construction activity emissions would be well below SCAQMD thresholds. Given the results of the analysis and compliance with regulatory requirements, the air quality impact during construction would be less than significant.

Operational Emissions

Operational Project emissions would include mobile source emissions from vehicle use and stationary source emissions from building components. Project maximum daily operational emissions are shown in **Table III-6, Maximum Daily Operational Emissions**.

Table III-6
Maximum Daily Operational Emissions

Emissions (lbs./day)						
	ROG	**NOx**	**CO**	**SO_2**	**PM-10**	**PM-2.5**
Operational Emissions [(a)]	4.9	0.9	15.5	< 0.1	2.4	0.6
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod 2022.1.1.21 Output in Appendix B. [(a)] Emissions reflect the maximum from summer or winter operational emissions						

As shown in Table III-6, operational peak daily emissions would be well below SCAQMD thresholds. Therefore, the Project would not substantially affect conformance with the AQMP or obstruct its implementation, the operational air quality impact of the Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or state nonattainment pollutants. As the Air Basin is currently in nonattainment for O_3 and PM-2.5, development could exceed an air quality standard or contribute to a deterioration in existing or projected air quality. To determine the significance of the Project's incremental contribution to cumulative air quality emissions, the SCAQMD recommends assessment of a project's potential contribution to cumulative impacts using the same significance criteria used for project-specific impacts. If an individual project's construction or operational emissions would be less than significant, then according to SCAQMD methodology, an individual project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment. Based on the Project emissions reported in Tables III-5 and III-6, the Project's construction and operational emissions would be below SCAQMD thresholds. Therefore, the Project would not generate a cumulatively considerable increase in emissions for those pollutants for which Air Basin is in nonattainment; the Project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations more susceptible to the effects of air pollution than the population at large. Land uses considered sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptor in the Project vicinity William Tell

Aggeler High School located on the south side of Plummer Street, approximately 0.31 miles (approximately 500 meters) the northwest of the Project Site boundary.

Localized Significance Thresholds

Localized Significance Thresholds (LST) were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative I-4 and are only applicable for certain criteria pollutants: NO_X, CO, and particulate matter (PM-10 and PM-2.5). SCAQMD states the use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency. This analysis considers construction emissions to evaluate potential impacts to sensitive receptors.

To determine if a project's maximum daily emissions may have a significant effect on nearby sensitive receptors, the SCAQMD provides LST screening thresholds for sites of 1-, 2-, and 5-acres, at various distances from potentially affected receptors. For this Project, LST impacts were evaluated based on the thresholds for the west San Fernando Valley for a one-acre site with a distance of 500 meters from the nearest sensitive receptor (the approximate distance to the closest receptor to the Project Site). The Project's estimated daily maximum on-site emissions of CO, NO_X, PM-10, and PM-2.5 generated during temporary construction activities, and the relevant LST screening levels, are listed in **Table III-7, Localized Significance Thresholds and Maximum On-site Construction Emissions**.

Table III-7
Localized Significance Thresholds and Maximum On-site Construction Emissions

LST 1 acre/500 meters W. San Fernando Valley	Project Emissions (pounds/day)			
	CO	NO_X	PM-10	PM-2.5
Max. On-Site Emissions[(a)]	15.4	15.9	3.5	2.0
LST Threshold[(b)]	6,815	245	155	3
Exceeds Threshold?	No	No	No	No

Source: CalEEMod 2012.1.1.21 Output in Appendix B.
[a] Onsite construction emissions estimates reflect required regulatory compliance with SCAQMD regulations (Rule 403) for reducing construction dust emissions.
[b] From LST Methodology Appendix C-1 - Mass Rate LST Look-up Tables, Accessed on January 5, 2023, at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2

As shown in Table III-7, daily onsite construction emissions resulting from the Project would not exceed LST thresholds; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project would result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum, and strong-smelling materials used in manufacturing, as well as some sewage treatment facilities and landfills. The Project involves no components related to these types of activities. Construction activities, such as paving and architectural coating, may produce discernible odors typical of most construction sites. Such odors would be temporary, based on the duration of those construction phases. Self-storage uses are not known to generate odors from operations. The activities on site would not vary substantively from other commercial and industrial uses in the area. Therefore, Project operations would not generate substantial objectionable odors; impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would result in a substantial adverse effect on any species identified as a candidate, sensitive or special-status species in local or regional plans. The Project Site is located within in the Chatsworth – Porter Ranch area of the City, which has been previously developed and designated for commercial uses by the General Plan Land Use Map.[8] The Project Site was previously developed but is now a vacant lot located in an urbanized area.

[8] Los Angeles Department of City Planning, General Plan Land Use Map: Chatsworth – Porter Ranch Community Plan, August 20, 2014.

Records of documented occurrences of State or federal endangered species identified in the Endangered Species Acts, as well as certain species of special concern designated by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), have been inventoried in the California Natural Diversity Database (CNDDB), which is maintained by the CDFW. The CNDDB was queried for nine U.S. Geological Survey (USGS) 7.5-minute quadrangle regions containing and surrounding the Project Site.[9] The CNDDB, Biogeographic Information and Observation System (BIOS) Viewer, California Native Plant Society (CNPS), and Critical Habitat for Threatened & Endangered Species (USFWS) literature search results are provided in **Appendix C**. The BIOS Viewer map show which species within the CNDDB have existed on the Project Site.[10] According to the BIOS Viewer map, the Project Site is within the radius of a 1966 observance of Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*); however, the site does not provide habitat for the species nor habitat for any of the species identified in the query results, and no substantial adverse effect on any species is anticipated. The Critical Habitat for Threatened & Endangered Species (USFWS) map shows the Project Site does not contain habitat essential for the conservation of threatened or endangered species.[11] Given the existing condition of the Project Site, the Project is not expected to have an impact on candidate, sensitive, or special-status species identified in local or regional plans, policies, or regulations by the CDFW or USFWS.

The Project Site does not contain any trees, plants, or additional biological resources on the Project Site. Since there are no biological resources on the Project Site, there would be no tree removal during construction of the Project. The site perimeter landscaping would include strawberry tree (*Arbutus unedo*), Rocky Mountain juniper (*Juniperus scopulorum*), Catawba crape myrtle (*Lagerstroemia indica*), various shrubs, and existing neighborhood trees located just outside of the Project Site.[12] The proposed landscape plan would be reviewed and approved by the Department of City Planning during the plan check process prior to issuance of a building permit.

Ground and vegetation disturbing activities, if conducted during the nesting bird season (February 1 to August 31), have the potential to result in removal or disturbance to vegetation that could contain active bird nests. Nesting birds may be disturbed by Project-related noise, lighting, dust, and human activities, which could result in nesting failure and the loss of eggs or nestlings. Project activities resulting in the loss of bird nests, eggs, and young, could violate the California Fish and Game Code.[13] In addition, removal or destruction of one or more active nests of any other birds listed by the federal Migratory Bird Treaty Act (MBTA) of 1918, whether nest damage was due to vegetation removal or to other construction activities, could violate the MBTA and California Fish and Game Code Section 3511. The loss of protected bird nests, eggs, or young due to construction activities would be a potentially significant impact. As a requirement of the MBTA, **Regulatory Compliance Measure (RCM) 4-1**, requires nesting bird surveys, if construction activities cannot feasibly avoid the breeding bird season, to assure impacts are less than significant.

Regulatory Compliance Measure:

RCM 4-1 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

Project construction will result in the removal of non-protected tree species from the Project Site and therefore may result in take of nesting native birds. Migratory nongame

[9] USGS 7.5-minute quadrangle regions: San Fernando, Santa Susana, Ota Mountain, Canoga Park, Calabasas, Van Nuys, Malibu Beach, Topanga, Beverly Hills.
[10] California Department of Fish and Wildlife, BIOS Viewer, Accessed on November 17, 2024 at: https://apps.wildlife.ca.gov/bios6/?al=ds85
[11] U.S. Fish and Wildlife Service, Critical Habitat for Threatened and Endangered Species, Accessed on November 17, 2023 at: https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77
[12] James Goodman Architecture, Final Initial Plan Set, Landscape Concept Plan, 2213-SD11.1, July 17, 2023.
[13] California Fish and Game Code Sections 3503 (any bird nest), 3503.5 (birds-of-prey), or 3511 (Fully Protected birds).

native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R Section 10.13). California Fish and Game Code Sections 3503, 3503.5 and 3513 \ prohibit take of all birds and their active nests including raptors and other migratory non-game birds (as listed under the Federal MBTA).

- Project construction activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code Section 86).
- If construction activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the Applicant shall:

a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

b. If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c. Alternatively, the Qualified Biologist could continue the surveys to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d. The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project would have a significant adverse effect on any sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS. Significant Ecological Areas (SEAs) are habitats designated by Los Angeles County for the promotion of biodiversity and contain irreplaceable biological resources. For SEAs, policies are established to conserve genetic and physical diversity by designating biological resource areas capable of sustaining themselves into the future. The Project is not located within a Los Angeles County designated SEA.[14] The Project Site and surrounding properties are located within a previously developed and urbanized area. The Project Site does not include any natural communities such as riparian habitat, coastal sage scrub, oak woodlands, or wetlands. Therefore, the Project would have no impact on sensitive natural communities.

[14] County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Adopted October 6, 2015.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A significant impact may occur if a project has a substantial adverse effect on federally protected wetlands or waters of the United States. According to the USFWS National Wetlands Mapper, no natural wetlands are located within or adjacent to the Project Site.[15] As the Project Site is urbanized and not located within any natural wetlands marshes, vernal pools, or waters of the United States, the Project would not remove or otherwise impair such areas and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if a project would substantially interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. A wildlife corridor contains physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed landscapes or landscapes fragmented by urban development. The urbanized Project Site is not within an area identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor.[16] As the Project Site is not located within a wildlife corridor, the Project would not substantially interfere with migratory corridors or impede wildlife movement and would have no impact.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City Protected Tree Ordinance ("Tree Ordinance").[17] The Tree Ordinance regulates tree protections, removal permitting, and replacements as applicable. The Tree Ordinance defines a Protected Tree as valley oak (*Quercus lobata*) and California live oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the scrub oak (*Quercus dumosa*), southern California black walnut (*Juglans californica var. californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) that measures four (4) inches or more in cumulative diameter, four and one-half feet (54 inches) above the ground level at the base of the tree.[18]

The Project Site does not have any existing biological resources thus would not remove any protected trees during development of the Project. Given there are no protected trees located on-site, there would be no impact regarding conflicts with regard to the City Tree Ordinance.

f. No Impact. A significant impact would occur if a project would be inconsistent with mapping or policies of an adopted or approved conservation plan. The Project Site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

[15] U.S. Fish and Wildlife Service, National Wetlands Inventory, Accessed on November 20, 2023, 2020 at: https://www.fws.gov/wetlands/data/mapper.HTML.
[16] County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.2, Regional Habitat Linkages, May 2014.
[17] City of Los Angeles, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21.
[18] LAMC, sec. 17.02 et. eq.

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

Impact Analysis

a. No Impact. A project would have a significant impact if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5, which defines criteria for historical resources. The Project Site is currently vacant and is not listed as a historical resource.[19] There are one individual resource and two historic districts in the area, based on the City's Historic Places LA database. These are, "Kona Kai Village" (individual), and "Rancho San Antonio Boys' Home," and "Atomics International." These resources are not located on or adjacent to the Project Site and are over 0.25 miles from the Project Site.[20,21] Further, these resources are cited for their association with Tiki/Polynesian residential architecture, Educational/Public and Private Institutional Development, and industrial development associated with civil defense, respectively, none of which apply to the Project Site, particular as a vacant parcel. In addition, neither the Project Site nor adjacent parcels are listed in the National Register of Historic Places or the California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) or SurveyLA. The Project Site is not located within, or designated as, a Historic Cultural Monument, a historic district, or other historic overlay zone.[22]

Since there are no existing buildings located on the Project Site and the Project is not located adjacent to any identified historical resources, the Project would result in no impact on a historical resource as defined in CEQA Section 15064.5.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the CEQA Guidelines defines criteria for determining the significance of cultural resources. A significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within a project site. Section 15064.5 of the CEQA Guidelines defines criteria for determining the significance of cultural resources.

[19] City of Los Angeles, ZIMAS, Accessed on January 17, 2024 at: http://zimas.lacity.org/.
[20] City of Los Angeles, Los Angeles Historic Resources Inventory, Historic Places LA, Accessed on January 17, 2024 at: https://hpla.lacity.org/search?geom_only=false&lite_query=true&paging-filter=1&precision=6&tiles=false
[21] City of Los Angeles, Los Angeles Historic Resources Inventory, Historic Places LA, Accessed on January 17, 2024 at: https://hpla.lacity.org/search?geom_only=false&lite_query=true&paging-filter=1&precision=6&tiles=false
[22] SurveyLA, Historic Resources Survey Report, Chatsworth-Porter Ranch Community Plan Area, July 9, 2015.

The California Native American Heritage Commission (NAHC) record search, received on January 18, 2023, was negative for cultural resources within the Project Site (**Appendix D**). The Project would be developed at-grade with no subterranean levels. While there are no known prehistoric archaeological resources on the Project Site, unknown historic or prehistoric archaeological resources may be unexpectedly encountered in southern California during ground disturbing activities. In accordance with the federal, State, and local guidelines, including those set forth in the California Public Resources Code (PRC) Section 21083.2, if archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find. These regulatory requirements prohibit personnel from collecting or moving any archaeological materials and associated materials discovered during excavation, grading, or construction activities. Construction activity may continue unimpeded on other portions of the Project Site. PRC Section 21083.2 requires found deposits to be treated in accordance with federal, State, and local regulations. Project compliance with local, state, and local regulations reduce potential impacts in the event of the inadvertent discovery of archaeological resources to less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project Site. The results NAHC record search was negative for cultural resources within the Project Site. While no formal cemeteries, other places of human internment, or burial grounds are known to occur within the Project Site, there is a possibility in southern California that human remains can be unexpectedly encountered during ground disturbing activities. If human remains are encountered unexpectedly during ground disturbing activities, regulatory requirements specified in State Health and Safety Code Section 7050.5 require that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with state laws, within the jurisdiction of the NAHC (PRC Section 5097), relating to the disposition of Native American burials must be adhered to. These laws require notification of the County Coroner and identification of the Most Likely Descendant, which ensures appropriate and respectful handling of the burials. Based on the ground disturbance history of the Project Site, the in-fill location, and the proposed depth of excavation, the inadvertent discovery of human remains is not reasonably expected but remains a possibility during ground disturbance. Regulatory compliance would reduce potential impacts in the event of the inadvertent discovery of human remains to less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

The following analysis is based on the CalEEMod output sheets dated February 2, 2024, provided in Appendix B.

a. Less than Significant Impact. A significant impact would occur if a project would result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.

Construction

During construction, the Project would use heavy-duty equipment for grading, paving, architectural coating, and building. Construction also involves trucks for material and supplies delivery, as well as powered hand tools. The majority of the equipment would likely be diesel-fueled. Smaller equipment, such as welders and pumps, may be electric-, gasoline-, or natural gas-fueled, and tower cranes would likely be electric. The CCR requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location.[23] Compliance with this regulation would also result in efficient use of construction-related energy and prevent unnecessary consumption of energy from diesel fuel.

According to carbon dioxide (CO_2) emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.5 pounds of CO_2 and burning one gallon of petroleum-based gasoline produces approximately 19.4 pounds of CO_2.[24] Based on these emissions factors and total Project construction-related CO_2 emissions, Project consumption of diesel and petroleum-based gasoline during construction is shown in **Table VI-1, Fuel Consumption During Construction**. The calculations are shown in a Construction Fuel Consumption Worksheet provided in **Appendix B** following the CalEEMod output sheets.

[23] California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.
[24] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, September 7, 2023.

Table VI-1
Fuel Consumption During Construction

Energy Type	Total MT CO_2	Total CO_2 pounds [a]	CO_2 emission factors	Total Gallons Consumed
Construction Equipment	176.28	386,630	22.5	17,272
Hauling/Vendor	59.54	131,263	22.5	5,834
			Total Construction Diesel	**23,106**
Mobile Worker	58.72	129,455	17.9	7,232
			Total Construction Gasoline	**7,232**

Source: CalEEMod, 9143 De Soto Consumption by Construction Phase Worksheet, Appendix B.
[a] 1 MT = 2,204.62 lbs. (approx.)

As shown in Table VI-1, based on U.S. Energy Information Administration fuel consumption factors and the estimated "total CO_2" emissions from the CalEEMod output sheets, Project construction would consume a total of approximately 23,106 gallons of diesel fuel and approximately 7,232 gallons of gasoline. In 2022, 13.6 billion gallons of gasoline were sold in California,[25] In 2015, 4.2 billion gallons of diesel, including off-road diesel, was sold in California.[26] As such, the use of construction equipment, transportation of materials, and workers necessary for the temporary duration of Project construction would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and CARB anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction is typical for developments of similar size and would not necessitate additional energy facilities or distribution infrastructure. Therefore, as Project construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources, impacts would be less than significant.

Operations – Electricity

The Project would generate additional demand for electricity from the Los Angeles Department of Water and Power (LADWP). As estimated by CalEEMod, the proposed Project's total electricity demand would be approximately 1,017,941 kilowatt-hour per year (kWh/year) or 1,017.94 megawatt-hours per year (MWh/year). The Los Angeles Department of Water and Power supplies more than 24 million MWh/year of electricity to the City's residential and business customers.[27] The Project would represent approximately 0.004 percent of the yearly LADWP electricity demand, a negligible increase in relation to the entire City's electricity demand. Therefore, the Project would not result in a significant environmental impact resulting from the increase in electricity demand.

In addition, the Project would be required to comply with applicable portions of the California Energy Code and California Green Building Standards Code (Title 24 of the California Code of Regulations) in effect at the time of building permit issuance, which establish standards for sustainable site development, energy efficiency, water conservation, and material conservation. The LADWP has increased renewable energy

[25] California Energy Commission, California Gasoline Data, Facts, and Statistics, Accessed January 10, 2024 at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics
[26] California Energy Commission, Diesel Fuel Data, Facts, and Statistics, Accessed January 10, 2024 at: https://ww2.energy.ca.gov/almanac/transportation_data/diesel.html.
[27] LADWP, Power Today, Accessed on January 12, 2024 at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afrLoop=1595016012439636.

usage through active procurement of renewable resources included in the Renewable Portfolio Standard[28] and the Strategic Long-Term Resource Planning,[29] which specifies a roadmap for providing reliable and sustainable electricity use to customers through 2045. The Project would be designed to meet or exceed all City Building Code and Title 24 requirements and incorporate eco-friendly building materials, systems, fixtures wherever feasible, including Energy Star appliances. Through project design features, compliance with applicable regulations, and continued energy efficient programs implemented by the Los Angeles Department of Water and Power, the Project would not result in wasteful or inefficient use of electricity energy supplies and impacts would be less than significant.

Operations - Natural Gas

Since the Project would be an all-electrical development, the Project would not demand natural gas from the Southern California Gas Company (SoCalGas). The Project is required to comply with applicable portions of the California Energy Code and California Green Building Standards Code, which sets standards for sustainable site development, energy efficiency, water conservation, and material conservation. By requiring compliance with applicable regulations, the Project would not result in wasteful or inefficient use of natural gas energy supplies and would have no impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Los Angeles' 2019 Sustainable City pLAn, also known as L.A.'s Green New Deal, [30] serves as the City's Climate Action Plan (CAP). The plan emphasizes renewable energy use and green building policies that guide private sector development, such as use of energy efficient lighting and appliances reduction of water usage which indirectly reduces energy use. Energy efficiency standards have been incorporated into the Los Angeles Green Building Standards Code.[31] The LAMC incorporates the CALGreen Code Title 24 standards, which require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and increased energy efficiency.

As a regulatory requirement of the City Department of Building and Safety review process, the Project would be reviewed for consistency with applicable state and local plans for renewable energy and efficiency. The Project would be built to the code standards in effect at the time of permit issuance. As the Project would comply with regulatory requirements and consist of energy efficient design features, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[28] LADWP, Power Today, Sustainability, Accessed on March 4, 2020 at: ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afrLoop=1596243708636711

[29] LADWP, Power Strategic Long Term Resource Plan, December 2022.

[30] City of Los Angeles, LA's Green New Deal, Sustainable City pLAn, 2019, Accessed January 27, 2023 at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

[31] The Los Angeles Green Building Standards Code is based on the California Green Building Standards Code that was developed and mandated by the State to attain consistency among the various jurisdictions within the State, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint.

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

Impact Analysis

The following analysis is based on the Soil Engineering Investigations (Soils Report) by Bay City Geology, Inc., dated August 11, 2023, [32] and provided in **Appendix E**.

[32] Bay City Geology, Inc. Soils Engineering Investigation, August 11, 2023.

a. i. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause 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. The nearest active faults are the Northridge Hills Fault and Chatsworth Fault, each located approximately two miles from the Project Site; however, the Project Site is not located in a state-designated Alquist-Priolo Earthquake Fault Zone or a City-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards.[33] Thus, the potential for surface rupture due to faulting is low. As the potential for surface rupture of a known earthquake fault is low, the Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

a. ii. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. As with all of southern California, the Project Site is in a seismically active area, has experienced previous earthquakes from regional faults, and may be subject to strong ground shaking during seismic activity. Hazards associated with ground-shaking can be reduced by designing and constructing the Project in conformance with building code standards and recommended engineering practices. Compliance with the City Department of Building and Safety plan check process and regulatory compliance would ensure the Project incorporates the recommendations in the Soils Report into final site plans. The Soils Report recommends that a geologist and soils engineer shall review and approve by signature and stamp the detailed plans prior to issuance of any building and/or grading permits to verify the plans include the Soil Report recommendations, ensuring potential seismic ground shaking impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iii. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction. Liquefaction is a mode of ground failure that results from the generation of high pore water pressures released during earthquake ground shaking, causing loss of shear strength. Liquefaction is typically a hazard where loose sandy soils exist below groundwater. The Project Site is not located within a liquefaction zone[34] and the Soils Report confirms the likelihood potential for liquefaction is very low. The State of California has prepared Seismic Hazard Zone Reports and Maps to regionally map areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacement. The Project Site is not located within a liquefaction hazard zone as designated on the California Geological Survey, Canoga Park Quadrangle Earthquake Zones of Required Investigation Map (1998, Plate 3). Bay City Geology obtained the historic high groundwater level from the California Division of Mines and Geology Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle (1997, 2005) that shows the historically highest groundwater level is on the order of 70 feet below site grade. Review of the Dibblee Geologic Map of the Oat Mountain and Canoga Park Quadrangles Los Angeles County, California (1992, Plate 2) which shows the Project Site is underlain Pleistocene-age alluvial soils. Using these sources, the Soils Report concluded the potential for liquefaction is very low at the Project Site. The City Department of Building and Safety would review the Project through the plan check process to ensure compliance with applicable Building Code requirements for seismic safety. Further, site-specific recommendations within the Soils Report to be incorporated into final site plans. Therefore, there would be less than significant impact regarding the risk of loss, injury, or death involving seismic-related ground failure including liquefaction.

[33] City of Los Angeles, ZIMAS, Accessed on November 13, 2023 at: http://zimas.lacity.org/.
[34] City of Los Angeles, ZIMAS, Accessed on November 13, 2023 at: http://zimas.lacity.org/.

Mitigation Measures: No mitigation measures are required.

a. iv. No Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides. The Project Site is relatively level and is not located within a hillside or landslide area.[35] There are no known landslides nearby, nor is the Project Site in the path of any known or potential landslides. Therefore, the Project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project would result in substantial soil erosion or the loss of topsoil. During construction, the Project would be required to implement erosion and sediment control Best Management Practices (BMPs) to prevent erosion and sediment loss and the discharge of construction wastes to prevent erosion and sedimentation.[36] Standard BMPs for construction sites include, but are not limited to, erosion and sediment controls such as scheduling, silt fencing, sandbags, and straw wattles to eliminate the water quality problems associated with sedimentation from stormwater runoff. Compliance with regulatory requirements would reduce impacts during construction to a less than significant level.

The Applicant is required to submit a Low Impact Development (LID) Plan to the City Bureau of Sanitation, Watershed Protection Division, for review and approval during the plan check process prior to issuance of a grading or building permit.[37] The Drainage Technical Report (Hydrology Report), included as (**Appendix F**), states infiltration BMPs are considered suitable for the Project Site. Stormwater will be collected in two drywell systems which will infiltrate the substrate soil. The Hydrology Report conducted a comparison of the existing and proposed hydrology for 50-, 25, and 10- year storm events that showed no substantial increase in peak flow rate with the implementation of the proposed development. Therefore, erosion impacts during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project is built on a geologic unit or soil that is unstable, or that would become unstable, as a result of a project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The topography of the Project Site and vicinity is relatively level. There are no known landslides near the Project Site. Therefore, there is no potential for slope stability hazards in the area. Lateral spreading usually occurs along the weak shear zones within a liquefiable soil layer. As the probability of liquefaction occurring at the Project Site is very low, as stated in the Soils Report, the probability of lateral spreading affecting the Project would be low.

Subsidence is a ground settlement which occurs when either groundwater or oil/natural gas is drawn out of the subsurface reservoir. The Project Site is not known to have any existing oil or natural wells onsite, so subsidence due to oil or natural gas pumping is unlikely. [38] There is no large-scale groundwater extraction of groundwater occurring or planned in the immediate vicinity of the Project Site and the San Fernando Groundwater Basin Remediation Program aims to restore San Fernando Groundwater levels back to historic capacity which would lower the risk of subsidence to occur.[39]

[35] City of Los Angeles, ZIMAS, Accessed on November 13, 2023 at: http://zimas.lacity.org/.
[36] LAMC, Chapter 6, Public Works and Property, Article 1, Section 61.02. Abatement of Erosion or Flood Hazard.
[37] Required by the City Stormwater LID Ordinance (Ordinance #181899).
[38] Joseph Barr, Project Geologist/Soils Engineering Director, email correspondence with Envicom Corporation, February 1, 2024.
[39] LADWP, San Fernando Groundwater Basin Remediation Program, January 2018.

As such, there is a less than significant impact regarding if the Project is built 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.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project is located on expansive soil, creating substantial direct or indirect risks to life or property. Expansive soils contain high amounts of clay particles that swell when wet and shrink when dry. Foundations constructed on expansive soils are subject to uplift caused by the swelling. The Soils Report concludes the earth materials at the Project Site exhibit very low to low expansion potential, so there would be no special considerations for expansive soils required for the proposed Project. As such, there would be a less than significant impact regarding expansive soil substantial creating direct or indirect risk to life or property.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact may occur if a site contains soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available. The Project Site is located in a developed area of the City served by an existing wastewater collection, conveyance, and treatment system operated by the Los Angeles Sanitation and Environment (LASAN). No septic tanks or alternative onsite wastewater disposal systems are proposed for the Project. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant. Paleontological resources are the fossilized remains of organisms from the geologic past and the accompanying geologic strata. The rock type exposed at the surface can indicate the potential for fossils. The Project Site is situated within the eastern Transverse Range Geomorphic Province in southern California. Geologic structures within the Transverse Ranges Province trend mostly east to west, in contrast to the prevailing northwest trend observed elsewhere in the state. The Transverse Range Province contains the highest peaks composed of pre-Phanerozoic rocks south of the Sierra Nevada and is both bounded and transected by several major fault zones. Surficial geologic units mapped at the Project Site consist of existing fill materials which overlay native alluvial soils. While the Project does not propose to construct a subterranean level, and because the site was previously graded for the prior development of the previous building, it is unlikely that fossil resource material will be uncovered. Nonetheless, Project is required to comply with regulations that address the inadvertent discovery of paleontological resources.

The regulations that apply to the inadvertent discovery of paleontological resources include the following for the Project. If an archaeological resource is discovered during Project construction, work in the area shall cease and deposits shall be treated in accordance with applicable federal, State, and local guidelines, including those that are set forth in California PRC Section 21083.2 with respect to unique archaeological resources. If it is determined that an archaeological site is an historical resource, the provisions of CEQA Guidelines Section 15064.5 shall also be implemented. For the Project, fossil (paleontological) resources will be equally treated under this regulatory requirement. In accordance with California PRC Section 5097.5, a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the State, or any city, county, district, authority, or

public corporation, or any agency thereof. Therefore, the Project, would result in a less than significant impact to paleontological resources.

Mitigation Measure: No mitigation measures are required.

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

Impact Analysis

Greenhouse gas (GHGs) can contribute to an increase in the temperature of the earth's atmosphere by absorbing infrared radiation transmitted by the sun, thereby trapping and retaining heat. The principal GHGs are CO_2, methane, nitrous oxide, ozone, and water vapor. The CEQA Guidelines define the following as GHGs: CO_2, methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs).[40]

Each GHG differs in its mass and ability to trap heat within the atmosphere based on factors such as capacity to directly absorb radiation, length of time in the atmosphere, and chemical transformations that create new GHGs. Because the warming potential of each GHG differs, GHG emissions are typically expressed in terms of carbon dioxide equivalents (CO_2e), common expression for the combined volume and warming potential of the GHGs generated by an emitter. Total GHG emissions from individual sources are generally reported in metric tons (MT) and expressed as MT of carbon dioxide equivalents ($MTCO_2e$). The following impact analysis is based on the CalEEMod output sheets in Appendix B.

a. Less than Significant Impact. A significant impact would occur if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction

During construction, the operation of equipment, disposal of construction waste, and use of some construction materials (paint, asphalt, etc.) would result in the short-term emission of GHGs. Total construction-related GHG emissions generated over the full duration of the construction period are provided in **Table VIII-1, Construction Greenhouse Gas Emissions**. SCAQMD guidance for GHG emissions analysis for construction recommends the amortization of emissions over a 30-year project lifetime to evaluate significance on an annual basis. Therefore, the amortized amount (30 years as recommended by SCAQMD) is also provided.

Table VIII-1
Construction Greenhouse Gas Emissions

	$MTCO_2e$
Total Construction GHG emissions	200
Amortized (over 30-year lifetime span)	6.7
Source: Annual CalEEMod 2022.1.1.21 output provided in Appendix B.	

[40] California Code of Regulations, Section 15364.5 Greenhouse Gas, Article 20, Definitions.

As shown in Table VIII-1, total emissions resulting from construction would be 200 $MTCO_2e$ and the 30-year amortized emissions would be 6.7 $MTCO_2e$. This amortized amount is added to the annual operational period emissions, evaluated below, to determine the Project's annual GHG emissions level of significance.

Operations

Project operations would result in GHG emissions from mobile sources, on-site use of heating, ventilation and air conditioning equipment, and off-site sources such as electricity generation, water distribution and treatment, disposal of solid waste, and wastewater treatment.

The SCAQMD CEQA Significance Thresholds GHG Working Group recommended a threshold of 3,000 $MTCO_2e$ per year for non-industrial land use projects. The SCAQMD has not adopted this screening threshold and the timeline for adoption is uncertain. For the purpose of analyzing Project GHG emissions, this evaluation uses, the proposed 3,000 $MTCO_2e$ per year screening threshold for non-industrial projects as a point of comparison. Total operational emissions, plus the annualized construction emissions, are provided in **Table VIII-2**, **Operational Greenhouse Gas Emissions.**

Table VIII-2
Operational Greenhouse Gas Emissions

Consumption Source	$MTCO_2e$
Area Sources	2.2
Energy Utilization	320.0
Mobile Source	364.0
Solid Waste Generation	31.9
Water Consumption	88.3
Annualized Construction	6.7
Total	**813.1**
SCAQMD Recommended Threshold	3,000.00
Source: Annual CalEEMod 2022.1.1.21 output provided in Appendix B.	

As shown in Table VIII-2, with the addition of amortized construction emissions, the total Project annual GHG emissions would be approximately 813.4 $MTCO_2e$ which is below the recommended threshold of 3,000 $MTCO_2e$. As the recommended threshold was not adopted, there is no numeric CEQA threshold that can be used to determine if the Project's GHG emissions would result in a significant impact. Therefore, based on CEQA Guidelines Section 15064.4(b)(3), the Project's GHG impacts will be qualitatively evaluated below based on consistency with applicable policies, plans and regulations adopted for the purpose of reducing emissions of GHGs. Since, as evaluated in subsection "b" below, the Project would be consistent with applicable policies, plans and regulations, the Project would have a less than significant impact regarding generation of GHG emissions that may directly or indirectly impact the environment.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project could have a significant impact if it would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. State AB 32, the Global Warming Solutions Act of 2006, established mandatory provisions and GHG reduction targets within specified time frames, including a requirement that California's GHG emissions be reduced to 1990 levels by 2020. The state achieved its 2020 GHG emissions reductions target of returning to 1990 levels 4 years earlier than mandated by AB 32. The 2022 Scoping plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.

The local CAP for the City is LA's Green New Deal: Sustainable City pLAn 2019 (Green LA). The Green LA CAP sets a goal of reducing GHG emissions to 50 percent below 1990 levels by 2025 and 73 percent below 1990 levels by 2035; and becoming carbon neutral by 2050 by implementing actions focusing on water, transportation, land use, and waste, generally indicate a need to increase water conservation and reduce per capita water consumption by 20 percent, convert City fleets to alternative fuel use and promote transit use and walking/biking, promote high-density housing near transportation arteries and transit stations, and increase recycling. To reduce GHG emissions from energy usage, the City's proposed the following goals in their Green LA: increase the amount of renewable energy provided; source 70 percent of water locally; present a comprehensive set of green building policies to reduce building energy use; and increase percentage of zero emission vehicles.

The Project would be required to comply with applicable requirements of the Los Angeles Green Building Standards Code, which is based on the California Green Building Standards Code, for efficiency and sustainability, including requirements that reduce GHG emissions associated with energy use, water, and waste. Therefore, the Project would not conflict with, or interfere with the City's ability to implement the CAP (Green LA). In addition to Green LA, the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill (SB) 375, aims to reduce the State's GHG emissions through linking transportation and land use planning. SB 375 requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy as a part of a Regional Transportation Plan. The Metropolitan Planning Organization for the Project site is SCAG, which adopted the RTP/SCS. As discussed in Section III., Air Quality, the Project would be consistent with the current City General Plan and Community Plan land use designation for the Project Site and would not create housing or otherwise lead to substantial unplanned population growth in the vicinity. Therefore, the Project would not be in conflict with population growth projections of the RTP/SCS Strategy or its goals associated with GHG reductions. As the Project would not interfere or conflict with local and regional goals and policies aimed at reducing the generation of GHG emissions, the Project impact would be less than significant.

Projects with less than significant impacts with regard to GHG emissions are consistent with approved local or regional plans adopted for the purposes of reducing GHG. Therefore, the Project impact would be less than significant if the Project is consistent with Green LA and RTP/SCS Strategies. As such, the Project would not interfere or conflict with local and regional goals and policies aimed at reducing the generation of GHG emissions, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

The following analysis is based on a Phase I Environmental Site Assessment Report dated February 28, 2023 (Phase I ESA) prepared by Converse Consultants (Converse), in **Appendix G**.

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project involves the routine transport, use, or disposal of hazardous materials, of sufficient type and quantity, to create a significant hazard to the public or the environment. Since the Project Site has already been demolished, there is no potential for Asbestos Containing Materials or lead-based paint. Construction requires the transport and use of paints, solvents, and equipment fuel. Construction personnel are responsible for compliance with applicable safety procedures, manufacturer specifications, and federal and State Occupational Safety and Health Administration regulations. The transport, use, and disposal of hazardous materials in compliance with applicable safety regulations would not represent a significant hazard to the public or environment.

Project operations would involve the routine transport, use, or disposal of commonly used hazardous materials. The hazardous materials include cleaning supplies and solvents used for housekeeping, janitorial services, and landscape maintenance. The transport, use, and storage of these materials would not create a significant hazard to the public or the environment through compliance with manufacturer specifications.

b. Less than Significant Impact. A project may have a significant impact if a project would 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. The Phase I ESA does not identify any Recognized Environmental Conditions (RECs) pertaining to the Project Site. The Environmental Database Resources (EDR) Report shows the Subject Property was active on the Hazardous Waste Tracking System (HWTS) but became inactive as of March 24, 2020. The Project Site is not within a CH_4 hazard site and does not have any wells located within the property boundaries.[41]

The past uses of the adjoining properties have been identified to be developed with commercial development since at least 1967. By 1977, the properties appeared to be developed for commercial and light industrial facilities. The following is a list of nearby properties that have been identified by the Phase I ESA EDR report:

- 7-Eleven Gas Station located at the northeast corner of De Soto Avenue and Nordhoff Street is listed as active status for the Los Angeles Hazardous Materials (LAHM) database and on the HWTS.
- Main Electric Supply located on 20931 Nordhoff Street is listed as active by the LAHM database. The facility was listed as active by the HWTS but is not inactive as of June 30, 2020.
- Litton Systems Inc/ Encoder Divisions located at 9168 De Soto Avenue was listed as inactive by the San Jose Hazmat database as of August 30, 2020.
- Circuit Services LLC. DBA Career Technologies located on 9134 Independence Avenue was listed in the HAZNET database for other inorganic solid waste, oxygenate solvents (acetone, butanol, ethyl acetate), and other inorganic solid waste. The facility was listed as active by the LAHM database on August 30, 2022.
- B & M Racing and Performance Products located on 9142 Independence Avenue was listed as inactive by the San Jose Hazmat database on August 30, 2022.

All the identified facilities listed above within the vicinity of the Project Site were deemed to have low potential for environmental concern by the Phase I ESA, which concludes no additional investigation is warranted. As such, there is a less than significant impact related to the accident release of hazardous materials into the environment.

c. Less than Significant Impact. A significant impact may occur if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Project is located within one-quarter mile of William Tell Aggeler High School, located at 21050 Plummer Street. The Project would not use, store, or dispose of the types of hazardous materials, or hazardous materials in sufficient quantities to result in a release of toxic emissions that would pose a public health hazard. Construction would involve the temporary use of paints, solvents, and equipment fuel. The construction crew would be responsible for the safe handling of these materials in compliance with safety procedures, manufacturer specifications, and federal and State Occupational Safety and Health Administration regulations. Operation of a self-storage facility would not cause a significant

[41] City of Los Angeles, ZIMAS, accessed February 20, 2020, at: http://zimas.lacity.org/.

hazard to the public or environment. Therefore, potential hazardous impacts to nearby schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if a project is located on site that is included on a list compiled pursuant to Government Code Section 65962.5, and, as a result, would create a significant hazard to the public or the environment. Government Code section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop an updated Cortese List. The Cortese List is used by State and local agencies, and developers, to comply with the CEQA requirements for information about the location of hazardous materials release sites. The data sources that provide information regarding facilities or sites to meet Cortese List requirements consist of:

- The California Department of Toxic Substances Control EnviroStor Hazardous Waste and Substances Site List;
- The State Water Resources Control Board GeoTracker database for Leaking UST sites;
- Solid waste disposal sites identified by State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit;
- The State Water Resources Control Board list of Cease-and-Desist Orders and Cleanup and Abatement Orders; and
- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified the California Department of Toxic Substances Control.

A search of the Cortese List databases in the Phase I ESA showed the Project Site is not on the Cortese List and there are no RECs, Controlled RECs, or Historical RECs pertaining to the Project Site.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A project would have a significant impact if it were 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 and would result in a safety hazards or excessive noise for people residing or working in the project area. The closest airport to the Project Site is the Van Nuys Airport, which is approximately 2.7 miles east. Since the Project Site is not located within an airport land use plan or within two miles of a public airport, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. A project would have a significant impact if it would interfere with an emergency response plan or emergency evacuation plan. The Project Site is located along De Soto Avenue; which is not designated as a disaster route. Nordhoff Street at the intersection south of the Project Site is designated as a secondary disaster route.[42] The Project Site contains sufficient space for temporary construction crew parking and equipment staging to take place on site during all phases of construction, thereby minimizing the temporary interference of construction vehicles with existing vehicle circulation on the noted disaster routes. Vehicular access to the Project Site will be provided by means of ingress/egress driveways along De Soto Avenue. The Project components are limited to Project Site boundaries and would not permanently alter vehicular circulation routes or impede public access or travel upon public rights-of-

[42] County of Los Angeles, Department of Public Works, City of Los Angeles – Valley Area: Disaster Routes, September 9, 2012.

way, including selected disaster routes. Therefore, neither Project construction or operations would physically interfere with an adopted emergency response plan or emergency evacuation plan, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. No Impact. A significant impact may occur if a project is located in proximity to wildland areas that pose a potential wildfire hazard to persons or structures. The Project is located in an urbanized area designated for light industrial and commercial uses that is not adjacent to, or in proximity (within a 0.5-mile radius) of wildland areas. The Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).[43] Nonetheless, the Project would be required to comply with applicable City Building and Fire Code requirements in effect at the time of Building Permit issuance to protect against fire risks. As the Project is not located proximate to wildland areas, the Project would not expose people or structures to wildland fire risks, and no impact would occur.

Mitigation Measures: No mitigation measures are required.

[43] City of Los Angeles, Los Angeles Fire Department, Fire Zone Map, Accessed on November 8, 2023 at: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere 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 on- or offsite erosion or siltation;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offside;	☐	☐	☒	☐
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?	☐	☐	☐	☒

The following analysis is based on the Hydrology Report prepared for the Project by Barbara L. Hall P.E., Incorporated, dated January 10, 2024. The Hydrology Report is included as Appendix F.

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and discharge into stormwater drainage systems or otherwise substantially degrade surface or groundwater quality. The California Regional Water Quality Control Board (State Water Board) and Los Angeles Regional Water Quality Control Board (Regional Water Board) adopted Waste Discharge Requirements (Order No. R4-2012-0175) for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (MS4 Permit). The Los Angeles County MS4 Permit specifies requirements for discharges within Los Angeles County's coastal watersheds. This MS4 Permit was issued in accordance

with National Pollutant Discharge Elimination System (NPDES) Permit (No. CAS004001). The LAMC also provides Stormwater and Urban Runoff Pollution Control requirements. As a regulatory requirement of these existing MS4 Permits and the LAMC (Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control), the Project would comply with applicable regulations to prevent the violation of water quality standards or the degradation of ground water quality.

Construction

Compliance with the Statewide Construction General Permit is required for the Project due to disturbance of site larger than one acre. This would include the preparation of a Project specific Stormwater Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan in accordance with the Statewide permit requirements. The Project would plan and implement BMPs for erosion and sediment control. Compliance with mandatory regulations and implementation of BMPS would reduce impacts regarding water quality standards during construction to less than significant.

Operation

To regulate site runoff during operations, the Applicant is required to submit a LID Plan to the City Bureau of Sanitation, Watershed Protection Division, for review and approval during the plan check process prior to issuance of a grading or building permit.[44] The Hydrology Report states infiltration BMPs are considered suitable for the Project Site. The Proposed design infiltration rate is estimated to be above the minimum required infiltration rate. As such, the Project incorporates two dry well systems which will intercept runoff from the 85th percentile storm events for capture of stormwater infiltration into the subsurface soils. The Hydrology Report conducted a comparison of the for existing and proposed hydrology for 50-, 25, and 10-year storm events which showed no substantial increase in peak flow rate with the implementation of the proposed development. The proposed storm water management system, prepared in compliance with Regional Water Board M4S Permit requirements, the City LID Ordinance, and the LAMC Stormwater and Urban Runoff Pollution Control requirements, would reduce potential impacts regarding water quality standards to less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project would have a significant impact if it substantially decreased groundwater supplies or interfered with groundwater recharge such that a project may impede sustainable groundwater management of the basin. The Project Site is located in the San Fernando Basin and is part of the Upper Los Angeles River Area.[45] The Project would be served by the Los Angeles Department of Water and Power for potable water supply and does not propose groundwater extraction. Therefore, the Project would not substantially deplete groundwater supplies. According to the Soils Report, groundwater was not observed in the borings while drilling to nine feet below adjacent site grades and the historic high groundwater obtained from the California Division of Mines and Geology indicates historically the highest groundwater level is about 70 feet below site grade.[46] The existing drainage pattern would be generally preserved after development of the Project and runoff from buildings and surface improvements will be intercepted by the site storm drainage system and conveyed to the two proposed drywell systems for infiltration into the subsurface soils. Overflow would be discharged to De Soto Avenue. Furthermore, the Project features a permeable landscape area around the perimeter of the development, allowing for groundwater recharge; thus, the Project would not substantially interfere with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Therefore, the impact to groundwater management of the basin would be less than significant.

[44] Required by the City Stormwater LID Ordinance (Ordinance #181899).
[45] Upper Los Angeles River Area Watermaster, Accessed on January 16, 2024 at: http://ularawatermaster.com/index.html?page_id=589
[46] Bay City Geology, Inc. Soils Engineering Investigation, August 11, 2023.

Mitigation Measures: No mitigation measures are required.

c.i. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial or erosion or siltation on site. The Project Site, which does not contain streams or river courses, is located in an urbanized area of the City. During construction, the Project would be required to prepare and implement BMPs that would reduce runoff leaving the site and filter storm water to reduce erosion or siltation. During operations, existing drainage flows into a public storm drain located on Nordhoff Street. During operations, stormwater draining from the Project Site would be collected into two drywell systems for treatment and infiltration with overflows exiting the site to storm drain inlets on De Soto Avenue. Therefore, the existing drainage pattern would be maintained while pre-treating the stormwater then infiltrating it into the subsurface soils. Through the proposed drainage features and compliance with existing LID Ordinance requirements, the Project would not result in substantial on- or offsite erosion or siltation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite.

The Project Site is located in an urbanized area with no streams or river courses. The Project is not in a designated flood zone.[47] To control surface runoff, the Project proposes two drywell systems for improved stormwater drainage. Similar to existing conditions, high volume overflows from the Project Site would be conveyed to De Soto Avenue into existing stormwater infrastructure on Nordhoff Street. Therefore, the impact of the Project pertaining to a substantial increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The Project would not result in a significant increase in site runoff because the Project would not alter existing drainage patterns or substantially increase the volume or velocity of runoff from impervious surfaces. The Project features a permeable landscape area around the perimeter of the Project Site, allowing for greater storm water infiltration. Stormwater that overflows the infiltration capacity of the proposed two drywell systems would exit the site to De Soto Avenue and drain to the existing public drainage on Nordhoff Street to the south. The Project is subject to the MS4 NPDES Permit (No. CAS004001), requiring the implementation of BMPs to control runoff, and a Wet Weather Erosion Control Plan to reduce stormwater pollution runoff during construction. The Project would not substantially increase runoff volumes that could affect the existing capacity of the stormwater drainage system or provide substantial additional sources of

[47] City of Los Angeles, ZIMAS, Accessed on January 16, 2024 at: http://zimas.lacity.org/.

polluted runoff to the existing drainage system, or otherwise substantially degrade water quality. The impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. No Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. The Project is not located in a designated flood zone. During operations, the existing drainage pattern would be generally preserved while the Project would install two drywell systems and infiltrate runoff back into the substrate soil. During construction, the Project would implement BMPs for erosion and sediment control. Therefore, the Project would have no impact on impeding or redirecting flood flows.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact would potentially occur if a project would risk the release of pollutants from inundation due to location in a flood hazard, tsunami, or seiche zone. The Project is not located in a flood hazard or tsunami zone.[48] A seiche, a wave created when a body of water is shaken, is a concern at water storage facilities because inundation can occur if the wave overflows a containment wall. The Project proposes a storage facility, which would not contain large quantities of hazardous materials, nor support or draw a large daytime population that could be exposed to inundation hazards at the site. The Project Site is not located in a potential inundation area.[49] The Chatsworth Nature Preserve and Reservoir is located approximately 1.3 miles west of the Project site; however, the site is not located within the inundation zone of the reservoir.[50] Therefore, the impact of the Project pertaining to the risk of release of pollutants due to location in flood hazard, tsunami, or seiche zone would be no impact.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A project would have a significant impact if it conflicted with, or obstructed implementation of, a water quality control plan or sustainable groundwater management plan. The Project would be an infill development served by the LADWP for domestic water; therefore, the Project does not propose groundwater extraction and would not interfere with a groundwater management plan. During construction, the Project would implement BMPs for erosion and sediment. During operations, the Project would capture and convey storm water in compliance with LAMC Stormwater and Urban Runoff Pollution Control requirements for water quality. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan.

Mitigation Measures: No mitigation measures are required.

[48] City of Los Angeles, ZIMAS, Accessed on January 17, 2024 at: http://zimas.lacity.org/.
[49] City of Los Angeles, ZIMAS, Accessed on January 17, 2024 at: http://zimas.lacity.org/.
[50] Department of Water Resources, Division of Safety Dams, Dam Breach Inundation Map Web Publisher, Accessed on January 30, 2023 at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

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

Impact Analysis

a. No Impact. A significant impact may occur if a project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. The Project Site is located in an urban portion of the Chatsworth within a designated Highway Oriented Commercial use zone. As in-fill development, the Project would develop a vacant site with a self-storage facility. Therefore, the Project would not physically divide an established community. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project causes a significant environmental impact due to inconsistency with the applicable land use plan, policy or regulation, including the zoning designations of a project site. The Project Site is located within the City's Chatsworth – Porter Ranch Community Plan area and subject to the land use designations and zoning regulations of local land use plans and zoning ordinance.

Regional Plans

Regionally, the Project is located within the SCAG planning area, the federally designated Metropolitan Planning Organization for the region. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with adopted regional plans. Given the Project's limited size, consistency with the General Plan, and lack of significant unavoidable impacts (as discussed throughout this IS/MND), the Project would not result in regionally significant impacts. The Project is located within the planning area of the SCAQMD, which implements the AQMP. As evaluated in Section III., Air Quality, the Project is also consistent with the AQMP, and no additional analysis is required.

City General Plan – Framework Element

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs to guide development of the City. The General Plan Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Framework Element provides broadly applicable land use policies pertaining to commercial and industrial development in Chapter 3, Land Use.[51] As the Project requires a Zone Change from MR-2 (Restricted Light Industrial Zone) and P-1 to C2 (Commercial Zone), a consistency analysis with applicable provisions of the Framework Element regarding industrial development is presented in **Table XI-1, Consistency Analysis with General Plan Framework Land Use Policies**.

[51] Los Angeles City Planning Department, The Citywide General Plan Framework, an Element of the City of Los Angeles General Plan, Chapter 3, Re-adopted by City Council on August 8, 2001.

Table XI-1
Consistency Analysis with General Plan Framework Land Use Policies

General Plan Framework Policy	Consistency Analysis
Chapter III: Land Use	
Goal 3H Lower-intensity highway-oriented and local commercial nodes that accommodate commercial needs outside centers and districts**.**	**Consistent**: The Project would be a commercial use located within a Highway Oriented Commercial plan land use designation and would provide a low intensity development with the self-storage facility.
Policy 3.12.1 Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.	**Consistent:** The Project would provide commercial development in an area designated for such uses by the Community Plan. The General Plan land use designation is Highway Oriented Commercial. According to Table 3-1 of the Framework Element, typical Commercial uses are: • Uses as permitted by existing zoning (generally, uses permitted in the C-2 zone) • Modifications to be determined by the community plans • Potential adjustment of density to reflect parcel size and configuration, intended functional role, and characteristics of surrounding uses determined through the community plan process With regard to the characteristics of surrounding uses, the property north, south, and east of the Project Site are designated Highway Oriented Commercial. Property to the north consists of neighborhood serving retail and restaurants. Properties south of the site consist of light manufacturing and commercial uses such as a gas station and tire shop. Properties to the east consist light manufacturing and commercial uses such as a gas station and self-storage uses. Table 3-7 in the Framework Element states the General Land Use Designation of "General Commercial" has the corresponding zones of C2, [Q]C2. The requested zone change from MR2 to C2 is consistent with the range of corresponding zones for the land use designation, and the Project would not result in any incompatibilities with adjacent uses or zones. Therefore, the Project is consistent with Policy 3.12.1.
Source: Citywide General Plan Framework, adopted by the City Council August 8, 2001.	

As shown in Table XI-1, the Project would be consistent with the applicable General Plan Framework Element policy regarding commercial development, such as self-storage uses.

City General Plan – Mobility Plan 2035

The Mobility Plan 2035 is an element of the City's General Plan that provides the foundation to building a transportation system that balances the needs of all users.[52] Various goals, objectives, and policies within this element aim toward achieving a balanced transportation system. Goals applicable to the Project include:

[52] Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, Adopted September 7, 2016.

- **Policy 3.1** – Access for All – The Project Site will continue to have sidewalk access on De Soto Avenue to facilitate pedestrian mobility within the area in accordance with applicable accessibility regulations.
- **Policy 3.5** – Multi-Modal Features –The Project will provide convenient and secure bicycle parking facilities. The Project Site is located within walking distance of various bus stops, which collectively provide access to Bus 166, Bus 244, Bus 787, and Bus 796.
- **Policy 3.8** – The Project Site Plan provides secure bicycle parking facilities with 16 short-term spaces and 16 long-term bicycle parking spaces.

Pedestrian access would be provided from a public sidewalk located along De Soto Avenue directly to provide access to the storage facilities. Multiple bus stops are within 0.5 mile of the Project Site (see list above), which encourages the use of public transportation. Additionally, as noted above, the Project provides short- and long-term bicycle parking spaces. Therefore, the Project would be consistent with the applicable policies of the Mobility Plan 2035.

Chatsworth – Porter Ranch Community Plan

The Project is located in the Chatsworth – Porter Ranch Community Plan area of the City with a land use designation of Highway Oriented Commercial. The Project would require a zoning change from the underlying designation of MR2-1 and P-1 to C2-1.

The Project would provide commercial development in an area designated for such uses by the Community Plan. The General Plan Land use designation is Highway Oriented Commercial. The Project would also be of similar scale, mass, land use and density as surrounding uses. Properties to the north are zoned (T)(Q) C2-1 and consist of neighborhood-serving retail and restaurants with surface parking. Surrounding properties to the east, along De Soto Avenue, are zoned (T)(Q) C2-1 and MR2-1/P-1 and are developed with a self-storage facility, gas station, restaurant and light manufacturing building. Properties to the south are zoned (T)(Q) C2-1 and are currently developed with neighborhood-serving retail and restaurants. One of the commercial buildings to the south is vacant. Properties to the west, adjacent to the Project Site, are developed with multiple light industrial buildings.

The Project would be accessible to public railways (Chatsworth Orange Line Station) and buses stops. The Project provides parking in a surface lot that wraps along the south building. Landscaping would be provided along the site perimeter as a buffer to separate the Project Site from adjacent uses.

Los Angeles Municipal Code and Zoning

The Project Site is zoned MR2-1 and P-1, meaning Restricted Light Industrial Zone and Automobile Parking Zone. The Applicant is requesting a Zone Change from MR2-1 and P-1 to C2-1 (Commercial Zone) for a self-storage development, which the environmental effects of which are considered in this Initial Study. The Zone Change would allow a four-story building and three single-story buildings to be developed in compliance with the LAMC.

Based on the analysis above, with approval of the Zone Change, the Project would not conflict with applicable land use plans, policy or regulations of agencies with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. The Project would result in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a 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?	☐	☐	☐	☒

Impact Analysis

a-b. No Impact. A significant impact may occur if a project would result in the loss of availability of a known mineral resource of value to the region, state, or if a project would result in the loss of availability of a designated, locally important mineral resource recovery site.

The Project proposes a commercial use (self-storage) in an existing urban setting that is City-zoned for restricted light industrial uses. Further, neither the site nor the surrounding area is mapped as a mineral resource area by the County.[53] According to the California Department of Conservation Mineral Land Classification Map, produced by the State Geologist as required by the Surface Mining and Reclamation Act (SMARA, PRC 2710 et seq.), the Project Site is located within a Mineral Resource Zone (MRZ)-1, meaning areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.[54] As the Project proposes in-fill development, the land is not suitable for mining, mineral resources would not be impacted by the Project.

Additionally, based on California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), no oil wells are identified on site.[55] which also references the Department of Conservation data, stating that the agency does not identify any wells or oil field onsite and that LADWP does not records identify any groundwater wells onsite. As neither the existing nor proposed use involves the extraction of mineral resources, and based on state and local mapping no such resources are expected at the site, the Project would not result in the loss of availability of known mineral resources or a locally important mineral resource recovery site. As such, no impact associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures: No mitigation measures are required.

[53] Los Angeles County Department of Regional Planning, General Plan Figure 9.6 Mineral Resources, May 2014.
[54] California Department of Conservation, Special Report 145, Plate 1.20, Mineral Land Classification Map, 1981.
[55] City of Los Angeles, ZIMAS, Accessed on November 8, 2023 at: http://zimas.lacity.org/.

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

Introduction to Noise

Noise is unwanted sound. Sound is mechanical energy transmitted in pressure waves through a compressible medium such as air. Sound pressure level, expressed in decibels (dB), is the most common descriptor to characterize the perceived "loudness" of a given sound pressure level. A decibel is a ratio of the unit of sound pressure to an assumed zero sound level. Variations in noise exposure over time are expressed in terms of a steady-state energy level equivalent to the energy content of the time period, called L_{eq}. A Leq measurement can be conducted for any time period, but generally they are conducted for at least 15 minutes for environmental noise studies. Community receptors are more sensitive to unwanted noise intrusion during the evening and at night. Therefore, for planning purposes, local jurisdictions adopt the Community Noise Equivalent Level (CNEL) or the Day and Night (L_{dn}) noise descriptor to assess noise and land use compatibility. Definitions of these descriptors and a full summary of the fundamentals of noise and vibration can be found in the noise appendix, **Appendix H**.

Regulatory Setting

City Noise Ordinance

The City noise standards for non-transportation sources are articulated in Chapter XI, Noise Regulation, of the LAMC, which contains the City's Noise Ordinances. This Chapter of the LAMC restricts the level of noise that one type of land use or activity may broadcast across the property line of an adjacent land use. Noise ordinance standards are stated with respect to ambient levels found prior to adding an identified noise source, such as a piece of construction equipment.

Section 111.03 of the LAMC establishes presumed ambient noise levels as a function of zoning and times of day provided in **Table XIII-1, Presumed Ambient Noise Levels in the City Noise Ordinance**. As noted in LAMC Section 111.03, in the absence of site-specific ambient noise measurements, these presumed ambient noise levels may be used as a baseline for the evaluation of noise increases. At the boundary between two zones, the presumed ambient noise level of the quieter zone shall be used.

Table XIII-1
Presumed Ambient Noise Levels in the City Noise Ordinance

Zone	Presumed Ambient Noise Level dBA	
	DAY [1]	NIGHT [2]
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, & R5	50	40
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
M1, MR1, and MR2	60	55
M2 and M3	65	65

Source: Los Angeles Municipal Code, Section 111.03.
[1] Daytime levels apply from 7:00 a.m. to 10:00 p.m.
[2] Nighttime levels apply from 10:00 p.m. to 7:00 a.m.

As shown in Table XIII-1, the presumed ambient daytime noise level for the Project Site, which is zoned MR2-1 and P, and is proposed C2-1 zoning is 60 dBA and the nighttime noise level is 55 dBA. Surrounding properties to the north, east, and south are zoned MR2-1 and C2-1, which have the same presumed ambient noise levels from Table XIII-1. Some deviation from these noise levels is allowed during the daytime for short-term (less than 15 minute) noise generation. The LAMC provides the following regulatory requirements related to noise generation in the City.

Operational Stationary Noise:

- LAMC Section 111.03 establishes presumed ambient noise levels as a function of zoning and times of day to be used as a baseline for evaluating noise increases. The site is zoned C2-1 (Commercial Zone), which the LAMC indicates would have a presumed ambient noise level of 60 dBA in daytime hours (7:00 a.m. to 10:00 p.m.) and 55 dBA in nighttime hours (10:00 p.m. to 7:00 a.m.).
- LAMC Section 112.02 prohibits any heating, ventilation, and air conditioning (HVAC) systems within any zone of the City from causing an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.
- LAMC Section 112.04 prohibits the operation of any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery equipment, or other mechanical or electrical device, or any hand tool which creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of a residence between 10:00 p.m. and 7:00 a.m. Gas powered blowers are prohibited within 500 feet of a residence at any time.

Construction Noise:

- LAMC Section 41.40(a) and (c) restricts construction activity to the hours below:
    - Monday through Friday between 7:00 a.m. to 9:00 p.m.
    - Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.
    - Sundays, no construction except for individual residents.
- LAMC Section 112.05 limits the maximum noise level of powered equipment or powered hand tools (e.g., construction equipment, including off-highway trucks). According to LAMC Section 112.05, any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA within 500 feet of a residential zone, when measured at a distance of 50 feet from the source, is prohibited unless compliance is technically infeasible.

The LAMC also states that, "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.

Pursuant to LAMC Section 112.05, the impact analysis of construction noise presented in Chapter 6.0 is based on the potential for the Project to result in construction noise levels exceeding 75 dBA at a distance of 50 feet.

Existing Conditions

To establish exiting conditions, an ambient noise monitoring survey was conducted on January 3 through January 4, 2024. The survey consisted of one short-term noise measurement (15-minutes) and one long-term noise measurement (24-hour). The short-term noise measurement was conducted using Soft dB, Piccolo Class 2 Sound Level Meters (SLM), which meets the American National Standards Institute (ANSI) standards for Type 2 instrumentation and the long-term noise measurement was conducted using a Larson Davis, LxT SLM which meets the ANSI standards for Type 1 instrumentation.

The SLMs were calibrated before and after the noise monitoring survey with a high precision Larson Davis CAL 200 calibrator. All SLMs were at least 5 feet above the ground and 5 feet from any other reflective surfaces and equipped with a windscreen. Meteorological conditions were favorable during the noise monitoring survey with average wind speeds of less than 1 mile per hour (mph) and temperatures of 62.5 degrees Fahrenheit (°F).

Results from the noise monitoring survey are summarized in **Table XIII-2, Long-term Noise Monitoring Results** and **Table XIII-3, Short-term Noise Monitoring Results,** followed by a brief description of each measurement location. Noise measurement locations are shown in **Figure 4, Approximate Noise Monitoring Locations**. A graph for the long-term noise measurement can be found in Appendix H.

Table XIII-2
Long-term Noise Monitoring Results

Measurement	Measurement Location	dBA				
		CNEL	Highest L_{eq-hr}	Lowest L_{eq-hr}	Daytime Average L_{eq}[1]	Nighttime Average L_{eq}[2]
LT-1	De Soto Avenue, next to Project Site	79	77	66	75	71

Notes:
CNEL = Community Noise Equivalent
[1] Daytime levels apply from 7:00 a.m. to 10:00 p.m.
[2] Nighttime levels apply from 10:00 p.m. to 7:00 a.m.

Long-term Location 1 (LT-1): was placed approximately 10 feet west of the nearest south bound travel lane centerline of De Soto Avenue. A 24-hour measurement began at 3:00 p.m. on Wednesday, January 3, 2024. The noise environment is primarily characterized by traffic noise along De Soto Avenue. Secondary noise sources included pedestrians, bicyclists, and occasional car horns.

Table XIII-3
Short-term Noise Monitoring Results

Measurement	Measurement Location	dBA			
		L_{eq}	L_{max}	L_{min}	L_{50}
ST-1	De Soto Avenue, next to Project Site	72.3	82.9	57.9	71.4

Source: Google Earth Pro, May 29, 2022.

envicom

Approximate Noise Monitoring Locations

FEET 0 50 100

FIGURE 4

Short-term Location 1 (ST-1): measurement took place approximately 16 feet west of the nearest south bound travel lane centerline of De Soto Avenue. A 15-minute measurement began at 3:07 p.m. on Wednesday, January 3, 2024. The noise environment is primarily characterized by vehicular traffic along De Soto Avenue. Traffic noise levels generally ranged between 62 dBA and 72 dBA. Other noise sources included pedestrians, bicyclists, and occasional car horns.

Impact Analysis

a. Less than Significant Impact. A project may result in a significant noise impact by generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance. The following analysis defines temporary increases in ambient noise as short-term increases resulting from the use of construction equipment and permanent increases in ambient noise as long-term increases resulting from operation of the proposed building components and off-site traffic trips generated from the Project once operational.

Construction Noise

Temporary noise from construction equipment is regulated through the LAMC, which limits noise to specified times. Noise from construction activity is also intermittent, meaning the source strength varies noticeably depending on the duration of equipment operation and physical distance between source and receptor.

Project-related construction noise is generated from off-site mobile sources used to transport workers and materials. As a regulatory requirement, Project construction is required to take place between 7:00 AM to 9:00 PM on weekdays, 8:00 AM to 6:00 PM on Saturdays and national holidays and no construction on Sundays (LAMC Section 41.40). During construction, the standard of 75 dBA at 50 feet for the operation of any powered equipment or powered hand tool would apply to the extent technically feasible (LAMC Section 112.05). Construction is estimated to begin September of 2024 and be completed by August of 2025.

Construction Trips

Construction activities would require the transport of workers and materials to and from the Project Site. These temporary construction trips would incrementally increase noise levels along roadways in the Project vicinity. Some construction vehicles would be passenger vehicles utilized by workers and vendors and others may be haul trucks used to import or export soil or demolition debris. Individual construction vehicles (such as haul trucks) passing by may create momentary noise levels of up to 85 dBA (L_{max}) at 50 feet from the vehicle, but these occurrences would be temporary and generally short lived as trucks pass by.

In order to estimate existing average daily traffic (ADT) volumes, manual counts were conducted during the ambient noise survey. Counts were taken over a 15-minute period on a weekday starting at 3:00 p.m. in the afternoon along De Soto Avenue in Los Angeles. A total of 570 trips (in both directions) were observed during the 15-minute period. To calculate ADT volume, this peak hour traffic count was multiplied by four to obtain the peak-hour traffic volume of 2,280 existing trips and then again multiplied by a standard peak-hour to daily multiplier of 10. As a result of these calculations, the estimated ADT along De Soto Avenue is approximately 22,800 vehicles.

Temporary construction vehicles were estimated using the CalEEMod defaults (see Section III., Air Quality, and Appendix B). CalEEMod estimates that up to 64 daily worker/vendor trips would be generated during building construction and up to 41 haul truck trips would be generated during grading. The generation of these construction trips would result in a less than 0.1 dBA CNEL increase. Therefore,

impacts associated with temporary off-site construction vehicles would be less than significant. Additionally, all construction trips would cease upon completion of the proposed Project.

Construction Equipment

The Construction Noise Handbook prepared by the Federal Highway Administration (FHWA) includes a national database of construction equipment noise levels. FHWA uses these reference noise levels in the Roadway Construction Noise Model (RCNM). **Table XIII-4, Construction Equipment Noise Levels**, identifies the average equivalent (L_{eq}) noise levels associated with the equipment types anticipated to be used for construction of the Project at a distance of 50 feet between the equipment and receptor as specified in the LAMC (Section 112.05).

Construction activities would occur in phases, such as site preparation, grading, building construction, paving, and architectural coating, with each phase involving the use of different types or numbers of construction equipment. Therefore, the types of equipment shown in XIII-4 would only need to be operated during the specific phase indicated in the table, rather than all at once.

Pursuant to LAMC Section 112.05, construction equipment noise levels are restricted to 75 dBA at 50 feet from the source unless compliance is "technically infeasible" despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment. As shown in Table XIII-4, the construction equipment that could generate the highest noise level is a grader which would generate a maximum noise level of 81 dBA L_{eq} at 50 feet.

Table XIII-4
Construction Equipment Noise Levels

Phase	Quantity and Equipment Type [1]	dBA L_{eq}		
		Hourly L_{eq} at 50 ft (dBA) [2]	**Reduction Feature and Attenuation (dBA) [3]**	**Reduced L_{eq} at 50 ft (dB)**
Site Preparation	Grader	81	- 6	75
	Rubber Tired Dozer	77	- 6	71
	Tractor/Loader/Backhoe	80/75/74	- 6	74/69/68
Grading	Grader	81	- 6	75
	Rubber Tired Dozer	77	- 6	71
	Tractor/Loader/Backhoe	80/75/74	- 6	74/69/68
Building Construction	Crane	73	- 6	67
	Forklift	68	- 6	62
	Generator Sets	78	- 6	72
	Tractor/Loader/Backhoe	80/75/74	- 6	74/69/68
	Welder	70	- 6	64
Paving	Tractor/Loader/Backhoe	80/75/74	- 6	74/69/68
	Paver	74	- 6	68
	Rollers	73	- 6	67
	Cement and Mortar Mixer	77	- 6	71
Architectural Coating	Air Compressor	74	- 6	68
Maximum Noise Level		**81**	**- 6**	**75**

[1] Construction Equipment List from the CalEEMod construction equipment defaults.
[2] Source: Federal Highway Administration, Construction Noise Handbook, Ch. 9, Construction Equipment Noise Levels and Ranges.
[3] Pursuant to LAMC Section 112.05, the Project would incorporate use of mufflers, acoustical blankets, enclosures, barriers, screens and/or other noise reduction device or techniques during the operation of the equipment.

Table XIII-4 also shows the attenuated (reduced) noise levels at 50 feet from the various types of construction equipment when employing appropriate mufflers and noise barriers around the site, which would be technically feasible. Specifically, a noise reduction of 6 dB would be required for compliance. A study conducted for the US Department of Transportation reported that applying a good muffler to equipment without one or with a poor muffler can reduce overall noise by 6 to 12 dBA.[56] This requirement would further reduce noise levels to 75 dBA or less at 50 feet. Therefore, construction-related temporary noise level increases would not exceed applicable standards when employing typical noise reduction techniques pursuant to the requirements of LAMC Section 112.05. Construction noise impacts would be less than significant.

Stationary Noise

Vehicle Loading and Unloading

The LAMC prohibits the loading or unloading of any vehicle or operation of dollies, carts, forklifts or other wheeled equipment which causes any impulsive sound or raucous or unnecessary noise within 200 ft of any residential building between the hours of 10:00 PM and 7:00 AM (LAMC Section 114.03). However, there are no residential receptors within 200 feet of the Project Site. The nearest residential receptors to the Project Site are apartment homes approximately 1,650 feet south of the Project boundary. Therefore, the hours of vehicle loading and unloading would not be restricted, and operational noise from vehicle loading and unloading to residential receptors would be less than significant.

Heating, Ventilation, and Air Conditioning Units

The Project proposes to install HVAC units on the rooftops of each building: Building A, B, and C. Though specific sound power specifications are unknown at this time related to the HVAC equipment, this analysis uses reference noise levels from a similar storage unit project. Based on the noise levels specified in the manufacturer's specification sheets for HVAC units similar to those expected for the Project, each HVAC unit would produce noise levels of 59 dBA L_{eq} at 10 feet.[57] The nearest sensitive receptor to the Project Site and proposed rooftop HVAC equipment is 1,650 feet to the south. Because point noise sources attenuate at a minimum rate of 6 dB per doubling distance, HVAC noise levels would attenuate to less than 20 dBA at the nearest sensitive receptors. Therefore, operational HVAC noise would not exceed the ambient noise level by more than 5 dBA in compliance with the LAMC (Section 112.02). The impact of operational HVAC noise on adjacent properties would be less than significant.

Traffic Noise

To estimate the incremental traffic noise increase from long-term traffic generated from the Project, the existing plus Project ADT is logarithmically compared to the existing ADT. As discussed under construction trips, to estimate existing ADT, manual counts were conducted over a 15-minute period along De Soto Avenue in Los Angeles. This total was multiplied by four to estimate the peak hour trips and the peak hour trips were multiplied by a standard peak hour to daily multiplier of 10. As a result of these calculations, the estimated ADT along De Soto Avenue is approximately 22,800. The Project would generate 181 daily trips.[58] Thus, the existing plus Project ADT would be approximately 22,981 along De Soto Avenue.

[56] Toth, William J. (Toth), Noise Abatement Techniques for Construction Equipment. Prepared for the National Highway Traffic Safety Administration, US Department of Transportation, August 1979.

[57] York International Corporation, York Technical Guide, R-410A ZE/XN Series 3-6 TON 60 Hertz, 2019.

[58] Los Angeles Department of Transportation (LADOT). November 2022. Transportation Study Assessment Referral Form. Retrieved January, 2024, from the Los Angeles Department of Transportation.

The addition of 181 daily trips to the estimated existing 22,800 ADT would result in a less than 0.1 dBA CNEL increase. This increase would be imperceptible to the human ear. Furthermore, there are no noise-sensitive receptors along De Soto Avenue. Therefore, the impacts would be less than significant.

Landscape Maintenance Noise

Project operations would include the use of lawn mowers, backpack blowers, edgers and landscape maintenance equipment for site upkeep and operations. Contractors would reasonably be expected to conduct routine landscape maintenance during daytime hours, therefore avoiding the period when such equipment noise is restricted between 10:00 PM and 7:00 AM required by the LAMC (Section 112.04). As landscape maintenance noise would be regulated by the LAMC, landscape maintenance noise-related permanent increases in ambient noise levels would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant vibration impact may occur if a project generates excessive short-term or long-term ground-borne vibration. Groundborne vibration from construction activities generates vibration levels of varying intensity depending on the equipment. As construction equipment operates, it generates vibrations that travel through the ground, creating a spectrum of effects ranging from imperceptible to humans to potentially physically impactful to nearby structures. Groundborne vibration propagates through the ground, and the attenuation of vibration can depend on various factors such as distance from the source, soil characteristics, vibration-specific frequencies, the building structure itself, and depth of the vibration sources.

Operational Vibration

The proposed Project would not include significant sources of operational vibration, such as rail systems or railroad tracks. Therefore, the Project would not generate substantial long-term vibration levels, and impacts would be less than significant.

Construction Vibration Damage

Groundborne vibration from construction activities rarely reaches levels that can damage structures. The City does not have vibration standards. Thus, this analysis uses the Federal Transit Administration (FTA) vibration damage criteria to assess vibration impacts associated with the Project. FTA provides vibration damage criteria based on four building categories summarized in **Table XIII-5, FTA Construction Vibration Damage Criteria**. The surrounding structures to the Project Site would fall under the FTA's Building Category II, with a vibration damage criterion of 0.3 inches per second (in/sec) peak particle velocity (PPV).

Table XIII-5
FTA Construction Vibration Damage Criteria

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

The predicted vibration levels generated by construction equipment at the surrounding buildings are provided in **Table XIII-6, Vibration Damage Levels at the Nearest Off-site Buildings**.

Table XIII-6
Vibration Damage Levels at the Nearest Off-site Buildings

Receptor Building	Construction Equipment	FTA Reference Level at 25 Feet (PPV, in/sec)	Distance to Commercial Buildings (feet)	Adjusted Vibration Levels at Commercial Buildings (PPV, in/sec)
Commercial/Retail Building to North	Vibratory Roller (paving area)	0.210	95	0.028
	Large Bulldozer	0.089	10	0.352
	Loaded Trucks	0.076	10	0.300
	Jackhammer	0.035	10	0.138
	Small Bulldozer	0.003	10	0.012
Commercial Building to South	Vibratory Roller (paving area)	0.210	70 feet	0.045
	Large Bulldozer	0.089	18	0.146
	Loaded Trucks	0.076	18	0.124
	Jackhammer	0.035	18	0.035
	Small Bulldozer	0.003	18	0.005
Data Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.				

As shown in **Table XIII-6, Vibration Damage Levels at the Nearest Off-site Buildings**, construction would generate vibration levels of up to 0.352 PPV in/sec at the nearest structure to the north from heavy earthmoving equipment, such as large bulldozers. This would exceed the FTA vibration criterion of 0.30 in/sec PPV for commercial buildings. Therefore, the Project would implement **RCM 4-2** to reduce impact of Groundborne vibration from large earth moving equipment by requiring small earthmoving equipment that would not exceed the FTA criteria of 0.30 in/sec PPV at the nearest off-site structures. As such, with implementation of regulatory compliance, the Project would have a less than significant impact on short-term and long-term ground-borne vibration.

Regulatory Compliance Measure:

RCM 4-2 Reduced Construction Vibration Levels

To reduce the impact of groundborne vibration from large earth moving equipment, such as large bulldozers and graders, the Construction Manager shall employ the use of small earth moving equipment limited to 100 horsepower or less within 25 feet of adjacent off-site structures. As shown in Table XIII-6, small earth moving equipment such as small dozers would generate vibration levels of up to 0.012 in/sec PPV and would not exceed the FTA's 0.30 in/sec PPV vibration damage threshold for commercial type buildings.

Prior to issuance of a grading permit, the Los Angeles Department of Building and Safety (LADBS) shall ensure the Applicant notes, on the Project Grading Plan, the appropriate setbacks or equipment substitutions at final plan check to the satisfaction of LADBS. LADBS shall periodically monitor construction activities to ensure compliance until issuance of Certificate of Occupancy or Use of Land.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A project located within two miles of a public airport or public use airport may result in a significant impact if a project would expose people residing or working in the Project area to excessive noise levels. The nearest airport to the Project Site is the Van Nuys Airport, located approximately 5.7 miles to the southeast.[59] The Project Site is outside the airport 65 dBA CNEL noise contour and is not located in the vicinity of a private airstrip. The Project Site does not fall into the airport land use plan area, Influence Areas, or 65 dBA CNEL noise contour of the Hollywood Burbank Airport.[60] Therefore, the Project would not result in the exposure of residents or those working in the area to excessive noise levels from a private airstrip or public airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

[59] Airnav, LLC (Airnav). 2023. Airport Information. Accessed on January 8, 2024 at: http://www.airnav.com/airports.
[60] Los Angeles World Airports (LAWA). 2023. VNY 3Q23 Quarterly Noise Report Map. Los Angeles World Airports. https://www.lawa.org/-/media/lawa-web/environment/files/vny---quarterly-noise-report/vny-3q23-quarterly-report-map.ashx

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would induce substantial unplanned population growth in an area, either directly or indirectly. SCAG forecasts population and employment growth in member jurisdictions. Forecasts for population and employment growth from 2024-2025 RTP/SCS (adopted by SCAG on April 4, 2024, and pending state certification) for the City are shown in **XIV-1, Population and Employment Growth Forecast**.

Table XIV-1
Population and Employment Growth Forecast

Year	City Population	City Employment
2019	3,907,200	1,954,000
2050	4,197,731	2,137,700
Net Growth	290,531	183,700
Source: Southern California Association of Governments, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics & Growth Forecast Appendix, Table 11, Jurisdictional-Level Growth Forecast, adopted April 4, 2024.		

As shown in Table XIV-1, SCAG forecasts City population and employment to increase from 2019 to 2050 by 290,531 people and 183,700 jobs. The Project would provide an allowable commercial self-storage use in a proposed C2-1 zone, with a single caretaker residential unit to serve existing storage needs in the area. The project would thus not introduce substantial unplanned direct or indirect population growth. The Project Site is served by existing infrastructure including streets, water, wastewater, gas, electricity, and stormwater; therefore, the Project would not result in infrastructure expansions that would indirectly result in substantial unplanned population growth. As such, the Project would have less than significant impacts.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere. As the existing Project Site contains no residences or residents and the Project proposes no residential development, the Project would not displace persons or housing or necessitate the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A project will normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service, the construction of which could cause significant environmental impacts. The Los Angeles Fire Department generally considers fire protection services to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to the LAMC, the maximum response distance between industrial and commercial neighborhoods and a Los Angeles Fire Department fire station that houses an engine company is one mile. The distance is 1.5 miles for a fire station that houses a truck company.[61] If the response time is greater than the distances specified above, all structures shall be constructed with automatic fire sprinkler systems.

Existing Los Angeles Fire Department stations in the vicinity would serve the Project. The nearest fire station is Los Angeles Fire Department Fire Station No. 96[62] within the Valley Bureau which is approximately 1.7 driving miles northwest of the Project Site. Other Los Angeles Fire Department fire stations in the vicinity and approximate distances include Station No. 90 (2.0 miles) and Station No. 106 (3.5 miles). The Project is outside the maximum response distance designated by the LAMC, so the Project must be designed with automatic fire sprinkler systems. Through the City plan check process, the Project would submit plans to the Los Angeles Fire Department for review and approval of fire prevention and safety features, including fire sprinklers, design features such as adequate driveway widths and access to the building, fire flow pressure, and fire hydrant placement. Based on the distance from the Project Site to existing fire stations, the Project would not require new or physically expanded fire stations, potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[61] Los Angeles Municipal Code, Article 7 Fire Code, Section 57.507.3.3. LAND USE, Table 57.507.3.3.
[62] Los Angeles Fire Department, Find Your Station, Accessed on November 13, 2023 at https://www.lafd.org/fire-stations/station-results

b. Less than Significant Impact. A project would normally have a significant impact if it requires new or expanded police station facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection. The Project Site is located within the Devonshire Community Police Station division of the Los Angeles Police Department Valley Bureau. The North Hollywood Community Police Station is located approximately 4.6 driving miles west of the Project Site and serves the community of Chatsworth.[63] Los Angeles Police Department prioritizes emergency calls for police assistance based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, the distance between a headquarters facility and the location of a particular emergency does not generally determine response times. Instead, the number of police officers on the street is more directly related to the realized response time.

Although construction sites can attract trespassers or vandals affecting public safety, construction is temporary. Temporary impacts would not require the construction or expansion of police facilities to serve the site or maintain service response times, as the Project Site would be monitored during routine patrols. The LAMC Chapter 1, Section. 14.4.17 requires the placement of temporary walls surrounding vacant lots and requires the Applicant to maintain the temporary construction wall free from graffiti. Compliance with LAMC regulatory requirements would reduce temporary impacts to police services to less than significant.

Once operational, the Project would not introduce substantial new residents and would develop a storage facility on the existing, vacant Project Site. Therefore, the Project would not result in a substantial increase in the Los Angeles Police Department service area population such that new or physically altered police facilities would be needed to maintain performance objectives. As such, permanent impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities exceeding the capacity of the Los Angeles Unified School District. The Project would construct a new storage facility, which includes only one caretaker residential unit. The Project would not introduce substantial new residential population and the associated generation of school-aged children, and therefore, would not generate a demand for school facilities that would exceed the capacity of Los Angeles Unified School District schools. The Project would not result in a need for new or improved facilities that would create a physical impact on the environment, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate a project-related population increase and a project resulted in the construction of new recreation and park facilities that create significant environmental impacts. The City Department of Recreation and Parks provides existing facilities for recreation in the Project area. Potential impacts to recreational facilities are also discussed in Section XVI., Recreation. As the Project would not introduce a substantial, new residential population, the Project would not result in a substantial increase in park usage such that new or physically expanded park facilities would be needed. Therefore, the Project would have a less than significant impact pertaining to park and recreation facilities.

[63] Los Angeles Police Department, Devonshire Community Police Station, Accessed on November 13, 2023 at: https://www.lapdonline.org/lapd-contact/valley-bureau/devonshire-community-police-station/?zip=9143%20de%20soto%20Los%20Angeles%20

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. Other public services in the Project vicinity include Los Angeles Public Library facilities. The Chatsworth Branch Library is 1.8 driving miles north of the Project Site, located at 21502 Devonshire Branch Library.[64] As the Project would not introduce a substantial, new residential population and would replace an existing light industrial building, the Project would not generate a volume of demand on existing library services that would necessitate the construction of new or physically expanded Los Angeles Public Library facilities. Given the scope and location, the Project would have a less than significant impact regarding the need for new or physically expanded Los Angeles Public Library facilities.

Mitigation Measures: No mitigation measures are required.

[64] Los Angeles Public Library, Chatsworth Branch Library, Accessed on February 21, 2020 at: https://www.lapl.org/branches/chatsworth

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which would 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. The City Department of Recreation and Parks provides existing facilities within two miles of the Project Site including Parthenia Park, Lanark Recreation Center, Sean Brown Park, Winnetka Recreation Center, and Mason Recreation Center.[65] As the Project would be a commercial development on a vacant infill lot and would not introduce a substantial, new residential population, the Project would not result in a substantial increase in park usage such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the Project would have a less than significant impact pertaining to park and recreation facilities.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, and such construction would have a significant adverse effect on the environment. As discussed above, the Project would be a commercial development on a vacant infill lot and would not introduce a substantial, new residential population. The Project would not require the construction or physical expansion of existing recreational facilities, and therefore, the Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

[65] City of Los Angeles Department of Recreation and Parks, Discover Facilities Accessed on January 18, 2024 at: https://www.laparks.org/discover-facilities?filters=location.distance.2

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards 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?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Transportation Assessment Guidelines (TAG) prepared by Los Angeles Department of Transportation (LADOT) establish the primary regulatory framework for determining if a project would conflict with applicable programs, plans, ordinances, and policies addressing the circulation system.[66] For the Project to have a less than significant impact, it must be consistent with applicable plans, programs, and ordinances within the City, including the Los Angeles Mobility Plan 2035, Plan for a Healthy LA (Healthy LA), the LAMC, Citywide Design Guidelines and the Land Use Element of the General Plan, which is comprised of 35 community plans. The Project would comply with the Mobility Plan 2035 and Land Use Element of the General Plan, as analyzed in Section XI, Land Use and Planning. The Project would be consistent with the Healthy LA, which creates the foundation to promote a healthier City for the citizens of Los Angeles. The Project would be developed adjacent to sidewalks, bus stops and the site plan will include bicycle parking, thus encouraging transit options that decrease the reliance on vehicles, all of which promotes a healthier lifestyle. The development of the Project would comply with Healthy LA and not conflict with applicable policies in to achieve the vision. The Project would also comply with the Citywide Design Guidelines 1-3 stated below, identified by the TAG.

1. Promote a safe, comfortable and accessible pedestrian experience for all.
2. Carefully incorporate vehicular access that it does not degrade the pedestrian experience.
3. Design projects to actively engage with streets and public space and maintain human scale.

The Project would be designed with two driveways that would allow both ingress and egress to the Project Site. Both access points would allow left- and right-turns onto De Soto Avenue with adequate vision for drivers to safely complete turns to either direction. The development of the Project would not interfere with pedestrian access or safety, rather engage and promote pedestrian experience with landscaping along the eastern front of the Project Site against the pedestrian right-of-way.

[66] LADOT, Transportation Assessment Guidelines, July 2020.

The Project Site is accessible by pedestrian travel, bicycle, and public transit, as well as by vehicles and is located within a Transit Priority Area.[67] The Los Angeles County Metropolitan Transportation Authority (Metro) operates the Chatsworth Orange Line Station located along Old Depot Plaza Road at Lassen Street approximately 1.1 miles northwest of the Project Site. The intersection section of Nordoff Street and De Soto Avenue has a bus stop for Bus Line 166 approximately 300 feet from the Project Site. Nordhoff G-Line Station is located approximately one-quarter mile west of the Project Site that provides access to the Orange Line Busway (G-Line). The Project also provides short-term and long-term bicycle parking spaces, as required by the LAMC.

Based on this discussion, the Project is consistent with the City's transportation plans and policies. Therefore, the Project would result in a less than significant impact regarding conflicts with a program, plan, ordinance or policy addressing the circulation system.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project would conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b). The intent of this threshold is to assess whether a land use project causes substantial vehicle miles traveled (VMT). The TAG presents screening criteria for Threshold T-2.1 for projects that require discretionary actions.

- Would the land use project generate a net increase of 250 or more daily vehicle trips?

The Transportation Study Assessment Referral form was reviewed by LADOT on December 12, 2023[68] (Appendix I) The Project would add a total of 243 daily trips and does not require a VMT analysis. Since the Project will not have an excess of 250 daily trips, the Project would have a "no impact" determination for Threshold T-2.1 and no further analysis is needed. As such, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b) and the Project would have no impact.

c. Less Than Significant Impact. A significant impact may occur if a project substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts from increasing hazards due to a geometric design feature generally relate to the design of access points to and from a project site and may include safety, operational, or capacity impacts. Impacts can be related to vehicle, bicycle, or pedestrian conflicts, as well as to operational delays caused by vehicles slowing and/or queuing to access a project site.

Construction

Safe pedestrian and bicycle circulation paths adjacent to or around the work areas shall be provided by detours or protective barriers, as necessary. The Applicant shall be required to submit the Construction Traffic Management Program for review and approval by the City prior to the issuance of grading and construction permits. Construction impacts would be less than significant.

Operation

During operations, vehicular access would be provided by two new driveways, replacing the two existing driveways, located along De Soto Avenue. The Project proposes both driveways to be approximately 30 feet wide and allow ingress and egress. De Soto Avenue fronting the Project Site has three travel lanes and clear visibility of oncoming vehicles An existing two-way left turn lane on De Soto along the Project

[67] City of Los Angeles, ZIMAS, Accessed on January 16, 2024 at: http://zimas.lacity.org/.
[68] Miguel Chrisotomo, City of Los Angeles Department of Transportation, Traffic Referral Form for CPC-2023-6312-ZC-CU-SPR / ENV-2023-6313-EAF, December 5, 2023 (Form prepared by Sara Houghton).

frontage would facilitate left turns in and out of the site for both driveways. The Project Site Plan includes paved roads between all three storge buildings to allow vehicles to load and unload. Due to the nature of the Project, with storage users coming at various times of day without a typical "peak hour", trips generated by the Project would not contribute to unacceptable queuing on or along driveways. Therefore, the Project would not substantially increase hazards due to a design feature and impacts during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project would result in inadequate emergency access. The Project Site is accessible to emergency vehicles by multiple existing freeways and surface streets in the Project vicinity. Emergency vehicles would access the urban in-fill site by two new driveways connected to De Soto Avenue. An existing two-way left turn lane on De Soto Avenue along the Project frontage facilitates left turns in and out of the Project Site. A Construction Traffic Management Program shall be implemented during the construction phase to minimize the temporary impact of construction on emergency access. The Project represents in-fill development on a previously developed site. The Project would not cause permanent alterations to vehicular circulation routes and patterns, nor would it impede public access or travel upon public rights-of-way. Therefore, the Project would not physically impact a designated emergency response or evacuation route or otherwise impede emergency access. Furthermore, through the plan check process, the Fire Department will review the proposed site plan to ensure the Project provides adequate access for emergency vehicles in compliance with applicable Fire Code requirements. Therefore, impacts related to emergency access would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Impact Analysis

The Tribal Notification Letter, dated January 24, 2024, and AB 52 Completion of Consultation letter dated March 28, 2024, are provided in **Appendix J.**

a. Less than Significant Impact. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 listed, or eligible for listing, in the California Register of Historical Resources, or in a local register of historical resources. As mentioned in Section V., Cultural Resources, in response to checklist question V.a., the site does not contain historical resources.

The results of the NAHC record searches were negative for cultural resources within the study area. In addition, the site is not listed in the National Register of Historic Places or California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) or SurveyLA. The Project Site is not located within, or designated as, a Historic Cultural Monument, a historic district, or other historic overlay zone.[69]

[69] SurveyLA, Historic Resources Survey Report, Chatsworth-Porter Ranch Community Plan Area, July 9, 2015.

While there are no known prehistoric archaeological resources on the Project Site, unknown historic or prehistoric archaeological resources may be unexpectedly encountered during ground disturbing activities. In accordance with the federal, State, and local guidelines, including those set forth in the California Public Resources Code (PRC) Section 21083.2, if archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find. These regulatory requirements prohibit personnel from collecting or moving any archaeological materials and associated materials discovered during excavation, grading, or construction activities. Construction activity may continue unimpeded on other portions of the Project Site. PRC Section 21083.2 requires found deposits to be treated in accordance with federal, State, and local regulations. Project compliance with local, state, and local regulations reduce potential impacts in the event of the inadvertent discovery of archaeological to less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. The results of the NAHC record searches were negative for cultural resources within the study area.

California AB 52 established a formal consultation process for California Native American tribes traditionally and culturally affiliated with a geographic area to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of the CEQA process. As specified in PRC Section 21080.3.1, lead agencies must provide notice inviting consultation to California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project if a tribe has submitted a request in writing to be notified of proposed projects within 30 days of the AB 52 notice.

In compliance with AB 52, the City provided notice to 10 tribes on January 24, 2024, soliciting requests for consultation. The tribal notification letter, provided in Appendix J, described the Project and informed California Native American Tribes they have 30 calendar days from receipt of this letter to notify the City in writing if they want to consult. Consultation can be ongoing throughout the CEQA process.[70] The City received back request for consultation from one tribe, the Gabrieleño Band of Mission Indians – Kizh Nation. Gabrieleño Band of Mission Indians – Kizh Nation presented evidence (to remain confidential as part of AB 52) to support the conclusion that the Project may result in a potentially significant impact. The City agreed substantial evidence exists to support the tribe's conclusion. However, the City, after acting in good faith and with reasonable effort, concluded mutual agreement cannot be reached for the purposes of AB 52 regarding specific language for mitigation of the tribal cultural resources. The City has determined that the Project must implement **TCR-1,** which requires a tribal monitor and archaeological monitor to observe all ground disturbing activities to ensure appropriate treatment of potential unknown tribal cultural resources. Consultation with the Gabrieleño Band of Mission Indians – Kizh Nation ended on March 28, 2024.

If human remains are encountered unexpectedly during ground disturbing activities, regulatory requirements specified in State Health and Safety Code Section 7050.5 require that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with state laws, within the jurisdiction of the NAHC (PRC Section 5097), relating to the disposition of Native American burials must be adhered to. These laws require notification of the County

[70] State of California, Governor's Office of Planning and Research, Technical Advisory, AB-52 and Tribal Cultural Resources in CEQA, June 2017, pg. 8.

Coroner and identification of the Most Likely Descendant, which ensures appropriate and respectful handling of the burials. Based on the ground disturbance history of the Project Site, the in-fill location, and the proposed depth of excavation, the inadvertent discovery of human remains is not reasonably expected but remains a possibility during ground disturbance.

After implementation of TCR-1 and regulatory compliance, the Project would have a less than significant impact after mitigation.

Mitigation Measure:

TCR-1 Tribal Monitoring

Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrieleño Band of Mission Indians – Kizh Nation. Any qualified archeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring the on-site monitoring shall end when the ground disturbing activities are completed, or when the archeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consulting with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporary cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in conjunction with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible
4. In addition to any recommendations from the applicable tribe(s), a qualified archaeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with the best practices identified the Native American Heritage Commission and in compliance with applicable federal, state, or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all cost and fees associated with the mediation.
6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long the radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or successor, may recommence ground disturbance activities inside of the specified radius of the discovery only after it has complied with all the recommendations developed and approved pursuant to the process to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidential Protocols.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, 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?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. The Project would generate water, wastewater, and stormwater typical of commercial uses in compliance with applicable federal, State, and local laws, statutes, and ordinances. As in-fill development, the Project would be served by the same public utilities infrastructure that served the previous urban land use (fitness center) on the Project Site; therefore, the Project would not result in the relocation or substantial expansion of that infrastructure, resulting in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if a project did not have sufficient water supplies available to serve a project and reasonably foreseeable future development during normal, dry, and multiple dry years. The LADWP would serve as the potable water purveyor to the Project Site. The LADWP supplies water through an extensive distribution system, comprising 7,340 miles of

distribution pipes and a total storage capacity of 323,820 acre-feet.[71] The 2020 Urban Water Management Plan (UWMP), indicates that LADWP has sufficient water supplies to meet anticipated water demands, which are based on growth identified in the 2020-2045 RTP/SCS. As the Project is considered consistent with SCAG projections (see Section XIV, Population and Housing) and the UWMP are based on those projections, the LADWP has adequate water supply to support the Project.[72] Water supplies for 2025 are projected by the Urban Water Management Plan to be 526,658 acre-feet per year (AFY).[73] The Project would develop on a now vacant site and construct and operate an approximately 108,448 sf self-storage development. Based on these characteristics, water demand is provided in **Table XIX-1, Project Water Demand**.

Table XIX-1
Project Water Demand

Type of Use	Size or Units	Demand Rate [(a)]	Water Demand
Proposed			
Self-Storage	108,448 sf	36 gpd/1,000 sf [(b)]	3,904 gpd [(c)]
Total Proposed Water Generation			**3,904 gpd**

[(a)] City of Los Angeles, Bureau of Engineering, Sewerage Facilities Charge, April 2012. Water demand assumed to be 120% of wastewater generation.
[(b)] "Storage: Self Storage Building" generation factor.
[(c)] gpd = gallons per day

As shown in Table XIX-1, the net increase in water demand resulting from the Project would be 3,904 gallons per day (gpd), or 4.37 AFY, a small fraction of one percent (i.e., 0.00095 percent) of LADWP's projected water demand for the Year 2025. The Project would comply with required Green Building Code requirements for water conservation, such as water saving/low flow fixtures and drought tolerant planting. Based on the availability of water supplies indicated in the Urban Water Management Plan, LADWP would have sufficient water supply to serve the Project and reasonably foreseeable future development. The Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a project would result in a determination by the wastewater treatment provider, which serves or may serve a project, that it does not have adequate capacity to serve a project's projected demand in addition to the provider's existing commitments. LASAN would serve the Project and operates more than 6,700 miles of public sewers that convey about 400 million gallons per day (mgd) of flow from residences and businesses to the City's three collection systems owned and operated by the City and conveyed to 29 satellite agency plants for treatment.[74] Wastewater generated from the Project Site would be conveyed to the Donald C. Tillman Water Reclamation Plant and an average wastewater flow rate of 80 mgd is treated per day.[75]

Existing sewer infrastructure would serve the Project, as existing laterals connect to existing wyes, short pipes with adjoining branches, that feed into the main line (Pipe ID 3911005139110053A) on De Soto Avenue maintained by the City Department of Public Works.[76] The estimated amount of wastewater the Project would generate is provided in **Table XIX-2, Project Wastewater Generation**.

[71] LADWP, Facts and Figures, Accessed on January 15, 2024 at: https://aboutyourwater.ladwp.com/
[72] LADWP, Urban Water Management Plan, 2020.
[73] LADWP, Urban Water Management Plan, 2020
[74] LA Sanitation, Sewer System Management Plan Version 3.0, January 2029.
[75] LA Sanitation, Donald C. Tillman Water Reclamation Plant, Updated April 2019.
[76] Navigate LA, Accessed on January 15, 2024 at: https://navigatela.lacity.org/navigatela/

Table XIX-2
Project Wastewater Generation

Type of Use	Size or Units	Demand Rate [(a)]	Water Demand
Proposed			
Self-Storage	108,448 sf	30 gpd/1,000 sf [(b)]	3,253 gpd [(b)]
Total Proposed Wastewater Generation			**3,253 gpd**

[(a)] City of Los Angeles, Bureau of Engineering, Sewerage Facilities Charge, April 2012.
[(b)] "Storage: Self Storage Building" generation factor.
[(c)] gpd = gallons per day

As shown in Table XIX-2, Project Wastewater Generation, the net increase in wastewater generation would be 3,253 gpd, a small fraction of one percent (i.e. 0.004 percent) of the excess treatment capacity at Donald C. Tillman Water Reclamation Plant. The LASAN approved the Sewer Capacity Availability Request (SCAR) on November 27, 2023.[77] Based on estimated wastewater generation, Donald C. Tillman Water Reclamation Plant would have sufficient capacity for the Project in addition to the provider's existing commitments and the SCAR has been approved by the LASAN. Therefore, the Project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a such a degree that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste generated within the City is recycled, reused, and transformed at waste-to-energy facilities or disposed of at landfills and recycling centers. LASAN provides collection for the Project Site. Solid waste collection by the City is contracted to private haulers and waste is brought to public and/or private solid waste transfer, resource recovery, and disposal facilities. The City does not own or operate any landfill facilities, and the majority of its solid waste is taken to Los Angeles County facilities.

Construction

Estimated Project-generated construction waste is provided in **Table XIX-3, Construction Solid Waste Generation**. The Project would remove an existing light industrial building used as office space with 4,277 sf of floor area and construct a new approximately 108,448 sf self-storage facility.

Table XIX-3
Construction Solid Waste Generation

Type of Use	Size	Generation Rate	Total Waste (pounds)	Total Waste (tons)
Construction				
Self-Storage	108,448 sf	4.34 lbs/sf[c]	470,664	235.3
Construction Waste Generation				235.3
Diversion of 50% for Recycling [d]				*-117.7*
Construction Solid Waste for Landfill Disposal				**117.7**

[a] Demolition waste tonnage from CalEEMod Outputs in Appendix B.
[b] Required by LAMC, Sections 99.04.408.1 and 66.32.
[c] United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amount. Table 2-2.

Since the prior use on the Project Site was already demolished, there would be no demolition waste generated as a result of the Project. Project construction would generate approximately 235.3 tons of waste

[77] City of Los Angeles, Bureau of Engineering, Sewer Capacity Availability Request, Approved on November 11, 2023.

as shown in Table XIX-3. The California Integrated Waste Management Act (AB 939) requires each California City and County to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a Source Reduction and Recycling Element that demonstrates how the jurisdiction will meet AB 939's mandated diversion goals of 50 percent. In accordance with the LAMC (Section 99.04.408.1, Construction and Demolition), the Project would require construction waste diversion of at least 50 percent in accordance with the California Green Building Standards Code (Sections 4.408 and 5.408).

The anticipated landfills to collect construction waste generated by the Project are Azusa Land Reclamation or Simi Valley Landfill and Recycling Center (SVLRC). Disposal of construction waste would occur over the course of building construction (200 days), which is approximately 0.59 tons per day (tpd), which represents less than one percent (0.007 percent) of the 8,000 tpd daily capacity of throughput at Azusa Land Reclamation[78] and less than one percent (0.02 percent) of the 3,000 tpd of the permitted capacity for waste daily disposal capacity at the SVLRC. [79] Additionally, SVLRC has proposed to increase permitted accepted waste to 6,000 tpd which. Construction waste would not exceed the daily permitted capacity of the Azusa Land Reclamation or SVLRC, resulting in a less than significant impact.

Operations

Employees of the proposed of the facility would generate solid waste typical of commercial uses. Operational waste is provided in **Table XIX-4, Operational Solid Waste Generation**.

Table XIX-4
Operational Solid Waste Generation

Type of Use	# of Employees	Generation Rate (lbs/employee/day) [a]	Total Waste (lbs/day)	Total Waste (tpd)
Operations				
Self-Storage	2 per day	10.53	20.46	0.01
Total Operations Waste Generation			**20.46**	**0.01**
Diversion of 50% for Recycling [b]			10.23	**0.005**
Total Operational Waste for Landfill Disposal			**10.23**	**0.005**

[a] City of Los Angeles. L.A. CEQA Thresholds Guide. 2006. Industrial Solid Waste Generation.
[b] Required by LAMC, Section 99.04.408.1 and 66.32.

As shown in Table XIX-4, Operational Solid Waste Generation, commercial uses are estimated to generate 10.23 pounds per employee per day. The 2021 Annual Report for the Countywide Integrated Waste Management Plan, which is the most recent report available, is the annual report to provide updates in solid waste management since the approval of AB 939. Solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-county landfills was approximately 100,295 tpd of solid waste in 2021. The total remaining permitted Class III landfill capacity in the County is estimated at 137.09 million tons.[80] Three County landfills are located within 15 miles of the Project Site, Sunshine Canyon City/County Landfill, Calabasas Landfill, and Chiquita Canyon Landfill.[81] According to the 2021 Annual Report, Sunshine City/County has 3,170 tpd remaining capacity, Calabasas Landfill has 2,655 tpd remaining

[78] Cal Recycle, SWIS Facility/Site Activity Details, Azusa Land Reclamation Co. Landfill, Accessed on January 16, 2024 at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3533?siteID=1001
[79] Waste Management, Simi Valley Landfill, Accessed on January 15, 2024 at: https://www.wm.com/location/california/ventura-county/landfill/index.jsp#:~:text=The%20SVLRC%20is%20permitted%20to,6%2C250%20tons%20of%20recyclable%20materials.
[80] Los Angeles County Public Works, Countywide Integrated Waste Management Plan, December 2022.
[81] Los Angeles County Public Works, Where Can I Take My Trash, Accessed on January 16, 2024 at: https://dpw.lacounty.gov/epd/swims/Residents/where-to-take-my-trash-esri.aspx

capacity, and Chiquita Canyon Landfill has 463 tpd remaining capacity.[82] The Project's generation of 0.005 tpd represents less than one percent of each landfill's remaining capacity. Therefore, operational solid waste impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. A significant impact may occur if a project would generate solid waste not disposed of in accordance with applicable regulations. The Project would generate solid waste typical of commercial uses and would comply with applicable federal, State, and local laws, statutes, and ordinances regarding the proper disposal of solid waste. With compliance of applicable laws, statutes, and ordinances, the Project would have a less than significant impact on regulations and statutes for solid waste.

Mitigation Measures: No mitigation measures are required.

[82] Los Angeles County Public Works, Countywide Integrated Waste Management Plan, Appendix E-3: Disposal Capacity Analysis Scenarios, December 2022.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factor, 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 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?	☐	☐	☐	☒

Impact Analysis

a-d. No Impact. The Project Site is located in an urbanized area of the City approximately one mile from the nearest wildland-urban interface. The Project Site is not located within or near a state responsibility area (SRA)[83] or land classified as a VHFHSZ.[84]

Existing Los Angeles Fire Department stations in the vicinity would serve the Project. In the event of a wildfire, the nearest fire station is Los Angeles Fire Department Fire Station No. 96,[85] approximately 1.7 driving miles northwest of the Project Site. Other Los Angeles Fire Department fire stations in the vicinity and approximate distances include Station No. 90 (2.0 miles) and Station No. 106 (3.5 miles). In addition, through the City plan check process, the Project would submit plans to the Los Angeles Fire Department for review and approval of fire prevention and safety features, including such design features as, adequate street widths and access to the building, fire flow pressure, and fire hydrant placement. The Project is not located within or near an SRA or VHFHSZ and therefore, the Project would have no impact regarding wildfires.

Mitigation Measures: No mitigation measures are required.

[83] Board of Forestry and Fire Protection, State Responsibility Area Viewer, Accessed on November 8, 2023 at: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1

[84] City of Los Angeles, Los Angeles Fire Department, Fire Zone Map, Accessed on November 8, 2023 at: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map

[85] Los Angeles Fire Department, Find Your Station, Accessed on November 13, 2023 at https://www.lafd.org/fire-stations/station-results

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of 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 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).	☐	☐	☒	☐
c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of 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.

The Project Site is in an urbanized area surrounded by urban uses such as adjacent commercial and light industrial land uses. As discussed in response to Section IV., Biological Resources, the Project Site was queried for nine USGS 7.5-minute quadrangle regions containing and surrounding the Project Site. The CNDDB, CNPS, and USFWS literature search results, provided in Appendix C, support the conclusion the Project Site does not provide habitat for rare or endangered plant or animal species. Therefore, the Project would not eliminate a plant or animal community or restrict the range of a plant or animal of a rare or endangered plant or animal.

As discussed, Section V., Cultural Resources, search results from SurveyLA and the NAHC for cultural resources on the Project Site were negative and there are no historic resources located on or adjacent to the Project. As such, the Project would not eliminate any known important examples of major periods of California history or prehistory. However, unknown cultural resources that could be encountered during

ground disturbance. The Project would follow local, state, and federal guidelines if unknown historical or prehistorical cultural resources are discovered on site, including those set forth in the California Public Resources Code (PRC) Section 21083.2, if archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find. Therefore, impacts to important examples of major periods of California history or prehistory would be less than significant with mitigation.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if the impacts of a proposed project, in conjunction with the impacts of related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together.

As previously evaluated in the impact analysis following each environmental factor in the Initial Study, the impact conclusions were either "no impact," "less-than-significant," or "potentially significant unless mitigation incorporated." The impacts of the Project would not substantively add to the impacts of related projects. Thus, the Project impacts in conjunction with the impact of related projects would not be cumulatively considerable and impacts would be less than significant.

Regulatory Compliance Measure: RCM-4 identifying that small earthmoving equipment shall be used to avoid vibration impacts has been required.

c. Less than Significant Impact. A significant impact may occur if a proposed project has the potential to result in substantial adverse effects on human beings. As discussed in the preceding sections, all potential impacts of the Project have been identified and mitigation measures have been prescribed, where applicable, to reduce potentially significant impacts to less than significant levels. Compliance with regulatory requirements and implementation of the mitigation measures in Section XIII, Noise would reduce substantial adverse impacts on human beings, either directly or indirectly, to less than significant.

Mitigation Measures: No mitigation measures are required.

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