LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

956 Seward Project

Case Number: ENV-2023-5533-MND

Project Location: 936-962 North Seward Street and 949-959 North Hudson Avenue

Community Plan Area: Hollywood Community Plan

Council District: 13- Hugo Soto-Martinez

Project Description: The 956 Seward Project (Project) is located on irregular-shaped lot that is approximately 1.29 acres or 56,254 square feet (sf) and includes eight parcels that are currently improved with a two-story 40,000 sf film climate-controlled storage facility built in 1952 and an associated surface parking lot to the north currently used for a truck rental business.

The Project proposes the demolition of the existing approximately 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story storage building (75 feet), which would consist of up to 168,478 sf that would include approximately 127,868 sf of self-storage, approximately 39,510 sf of temperature-controlled film and media storage, and up to 1,100 sf of leasing uses. It also includes a surface-level parking lot and bicycle parking spaces at ground-level, as well as landscaped areas throughout the Project area, including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street. The Project would have a floor area ratio (FAR) of 2.99.

The Project proposes 47 automobile parking spaces provided onsite in a surface-level parking lot and 40 bicycle parking spaces would be provided onsite at ground level. The Project provides vehicular access along Romaine Street and Hudson Avenue. Romaine Street would contain one driveway permitting the entry and exit of vehicles. Hudson Avenue would contain one driveway permitting only the exit of vehicles.

Development of the Project would require the export of approximately 5,200 cubic yards (cy) of soil. The cut quantity is 6,033 cy, with 141 cy of fill and 686 cy of clear and grub. The maximum excavation depth is 6.5 feet. All necessary utility improvements including water, sewer, and storm drain would be constructed within the property limits.

Construction is expected to begin in the first quarter of 2025, and ending in 2026. The Project is expected to be operational in the first quarter of 2027. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays.

There are eight parkway trees and seven trees on the Project Site. The Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the

removal/replacement (at a 1:1 ratio) of seven on-site trees. Six replacement trees will be planted in the adjacent parkway, and seven replacement trees will be planted on-site, a total of 13 replacement trees. As part of the overall development, the Project proposes to retain five trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees) which is 25 more trees than is required for replacement trees (13 required replacement trees).

This environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

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221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Prepared For:
The City of Los Angeles
Department of City Planning

Prepared By:
Kimley-Horn and Associates, Inc.

Applicant:
Baranof Holdings Land Development, LLC

August 2024

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1 INTRODUCTION

An application for the proposed 956 Seward Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required. This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. This Initial Study is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE AND SCOPE OF THE INITIAL STUDY

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

An application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

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

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

1.2 REPORT ORGANIZATION

This document has been organized into the following sections:

Section 1.0 – Introduction. This section provides an introduction and overview describing the conclusions of the Initial Study.

Section 2.0 – Executive Summary. Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

Section 3.0 – Project Description. This section identifies key Project characteristics and includes a list of anticipated discretionary actions.

Section 4.0 – Environmental Evaluation. Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project. This Section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070(b), the mitigation measures contained in Section 4, below have been agreed to by the Applicant.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties. At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that with implementation of mitigation, agreed to by the Applicant, the Project would not have a significant effect(s) on the environment and a MND will be appropriate for the Project. As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt an MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed Negative Declaration or MND shall be not less than 20 days (or 30 days when a proposed Negative Declaration or MND is submitted to the State Clearinghouse for review by state agencies).

2 EXECUTIVE SUMMARY

PROJECT TITLE	956 Seward Project
ENVIRONMENTAL CASE NO.	ENV-2023-5533-MND
RELATED CASES	CPC-2023-5532-ZC-HD-CU-SPR-WDI
PROJECT LOCATION	936-962 North Seward Street and 949-959 North Hudson Avenue, Los Angeles, CA 90038
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	Limited Manufacturing
ZONING	MR1-1 and R3-1
COUNCIL DISTRICT	13
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Planning Department
STAFF CONTACT	Valentina Knox-Jones
ADDRESS	200 N. Spring Street, Room 621
PHONE NUMBER	(213) 978-1741
EMAIL	valentina.knox.jones@lacity.org
APPLICANT	Baranof Holdings Land Development, LLC
ADDRESS	2850 N. Harwood Street, Suite 1000, Dallas, TX, 75201

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

- ☐ Aesthetics
- ☐ Air Quality
- ☐ Agricultural and Forestry Resources
- ☐ 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:

On the basis of this initial evaluation (check one):

- ☐ 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, nothing further is required.

CERTIFICATION:

Valentina Knox-Jones	City Planner
PRINTED NAME	**TITLE**
Valentina Knox-Jones	7/22/24
SIGNATURE	**DATE**

Evaluation of Environmental Impacts:

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 956 Seward Project (Project) is located on irregular-shaped lot that is approximately 1.29 acres or 56,254 square feet (sf) and includes eight parcels that are currently improved with a two-story 40,000 sf film climate-controlled storage facility built in 1952 and an associated surface parking lot to the north currently used for a truck rental business surrounded by metal fencing.

The Project proposes the demolition of the existing approximately 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story (75 feet) storage building, which would consist of up to 168,478 sf that would include approximately 127,868 sf of self-storage, approximately 39,510 sf of temperature-controlled film and media storage, and up to 1,100 sf of leasing uses. It also includes a surface-level parking lot and bicycle parking spaces at ground-level, as well as landscaped areas throughout the Project area, including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street. The Project would have a floor area ratio (FAR) 2.99.

The Project proposes 47 automobile parking spaces provided onsite in a surface-level parking lot and 40 bicycle parking spaces provided onsite at ground level. The Project provides vehicular access along Romaine Street and Hudson Avenue. Romaine Street would contain one driveway permitting the entry and exit of vehicles. Hudson Avenue would contain one driveway permitting only the exit of vehicles.

Development of the Project would require the export of approximately 5,200 cubic yards of soil. The cut quantity is 6,033 cy, with 141 cy of fill and 686 cy of clear and grub. The maximum excavation depth is 6.5 feet. All necessary utility improvements including water, sewer, and storm drain would be constructed within the property limits.

Construction is expected to begin in the first quarter of 2025 and ending in 2026. The Project is expected to be operational in the first quarter of 2027. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays.

There are eight parkway trees and seven on the Project Site. The Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the removal/replacement (at a 1:1 ratio) of seven on-site trees. Six replacement trees will be planted in the adjacent parkway, and seven replacement trees will be planted on-site, a total of 13 replacement trees. As part of the overall development, the Project proposes to retain five trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees) which is 25 more trees than is required for replacement trees (13 required replacement trees).

This environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 936-962 North Seward Street and 949-959 North Hudson Avenue within the Hollywood community of the City of Los Angeles (City); see **Figure 1:** Regional and Vicinity Map and **Figure 2**: Aerial of Project Site.

The Project is bounded by West Romaine Street to the north, North Hudson Avenue to the east, and North Seward Street to the west. The Project Site is an irregular-shaped lot that is approximately 1.29 acres or 56,254 square feet (sf). The Project Site is located within close proximity to several transit options. Numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project, including Metro Line 4 and Metro Line 210.

3.2.2 Existing Conditions

The Project Site is comprised of eight parcels with the following Assessor Parcel Numbers (APN): 5533-023-001, -002, -003, -017, -018, -026. The Project Site is currently improved with a two-story 40,000 sf film climate-controlled storage facility built in 1952 and an associated surface parking lot to the north currently used for a truck rental business surrounded by metal fencing. There is a frontage of approximately 274 feet along Romaine Street to the north, 155 feet along Hudson Avenue to the east, and approximately 250 feet along Seward Street to the west.

The adjacent Seward Street parkway contains six parkway trees. Five trees in the parkway are in good condition and are proposed for retention and protection, including two Canary Island date palm (Phoenix canariensis) trees, two Brisbane box (Lophostemon confertus) trees, and one jacaranda tree. One lemon bottlebrush (Jacaranda mimosifolia) tree in the parkway is in poor condition and is proposed for removal and are required to be replaced at a 2:1 ratio within Project Site adjacent parkway. The adjacent Romaine Street parkway does not contain any street trees, however, the Project proposes two trees to be planted in the parkway.

The Project Site contains seven on-site trees on its eastern border, all weeping fig trees (Ficus benjamina) maintained as a hedge. The adjacent Hudson Avenue parkway contains two parkway trees. The two camphor (Cinnamomum camphora) trees in this parkway are both in poor condition and are proposed for removal and required are to be replaced at a 2:1 ratio. In summary, the Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the removal/replacement (at a 1:1 ratio) of seven on-site trees. Six replacement trees will be planted in the adjacent parkway, and seven replacement trees will be planted on-site, a total of 13 replacement trees. All replacement trees will be of the 24-inch box size at a minimum, and parkway replacement tree species selection will conform to the City's "Street Tree Selection Guide."

The tree survey prepared for the Project (Appendix B) did not find any protected trees (listed in the City's Preservation of Protected Trees Ordinance No. 186873, on-site, nor within 50 feet of the Project Site.

Nearby land uses are comprised of residential, industrial, studio, and commercial uses. Nearby structures vary in building style and materials.

- **North:** The lots directly to the north of the Project Site across Romaine Street are zoned MR1-1, M1-2D, and R3-1 and include a variety of one - to five -story commercial, restaurant, studio, and parking buildings.
- **West:** The lots directly to the west of the Project Site across Seward Street are zoned MR1-1 and include various one - to four -story film, commercial, and office uses.
- **East:** The lots directly to the east of the Project Site across Hudson Avenue are zoned R3-1 and include one - to five -story single-family and multifamily residential uses**.**
- **South**: Lots directly south of the Project are zoned MR1-1 and R3-1 and include one to two story studio and residential uses.

3.3 DESCRIPTION OF THE PROJECT

3.3.1 Project Overview

As shown in **Table 1**: *Project Development Summary*, the Project proposes the demolition of the existing approximately 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story storage building[1], which would consist of up to 168,478 sf that would include approximately 127,868 sf of self-storage, approximately 39,510 sf of temperature-controlled film and media storage, and up to 1,100 sf of leasing uses. It also includes a surface-level parking lot and bicycle parking spaces at ground-level, as well as landscaped areas throughout the Project area, including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street. The Project would have a floor area ratio (FAR) of 2.99.

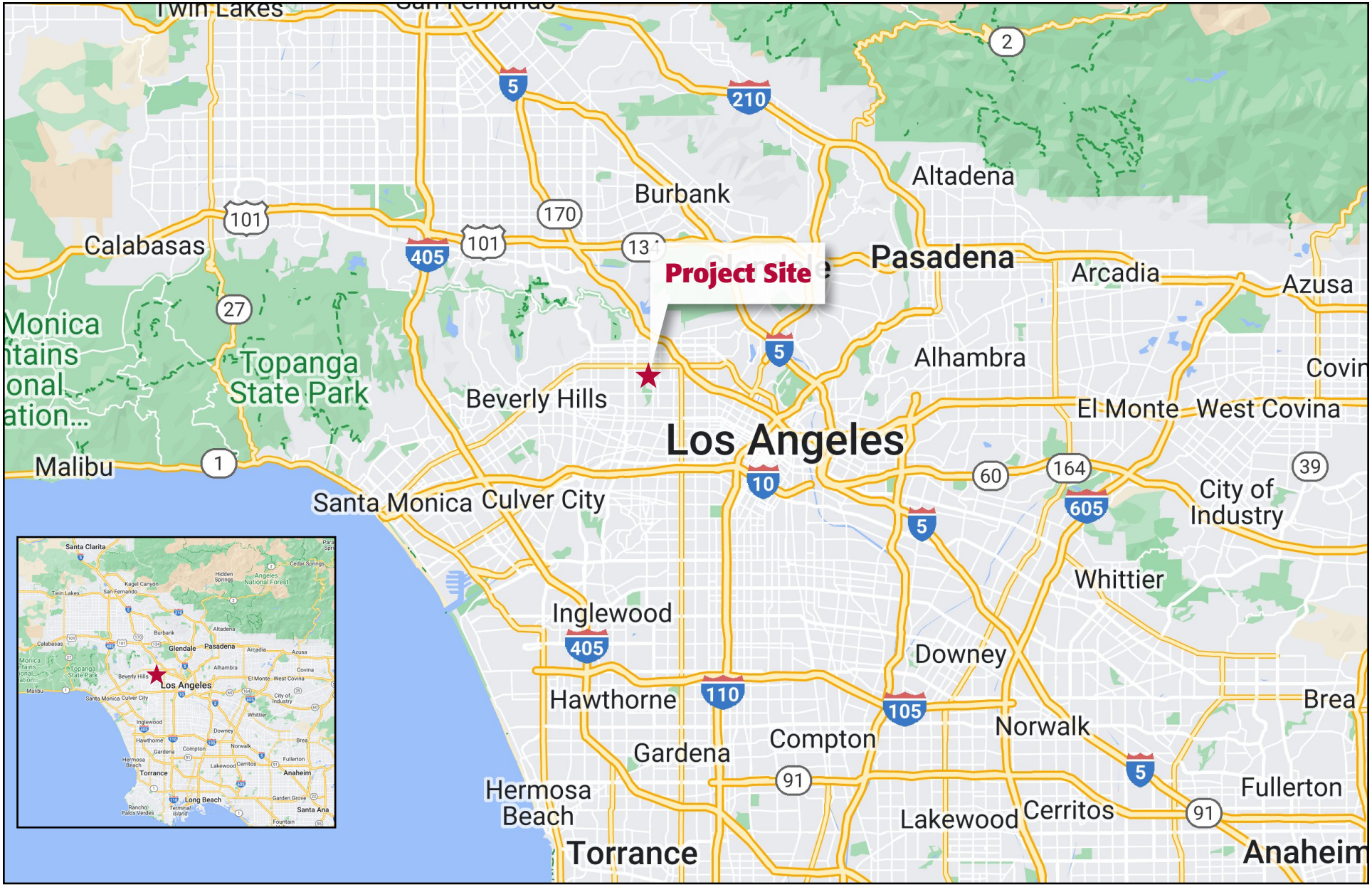
The Project proposes an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street. The Project proposes a total of approximately 7,534 sf of landscaped areas throughout the Project Site.

Table 1: Project Development Summary

Project Component	Proposed
Office Leasing (Floor 1)	1,100 sf
Storage General Self Storage (Floors 1 to 6)	127,868 sf
Storage Film and Media (Floors 6 and 7)	39,510 sf
Total	**168,478 sf**
Height	75 feet
Stories	7
Source: Michael W. Folonis Architects, December 2023.	

Figure 3 depict the proposed site plan, **Figures 4** and **Figure 5** depict proposed elevations. **Figures 6** and **Figure 7** depict the proposed rendering of the Project.

[1] Note the MND's associated technical reports uses a slightly higher calculation of the square footage associated with the proposed building to provide a more conservative analysis.



SOURCE: Google Maps, 2023

N.T.S.

Figure 1: Regional and Vicinity Map

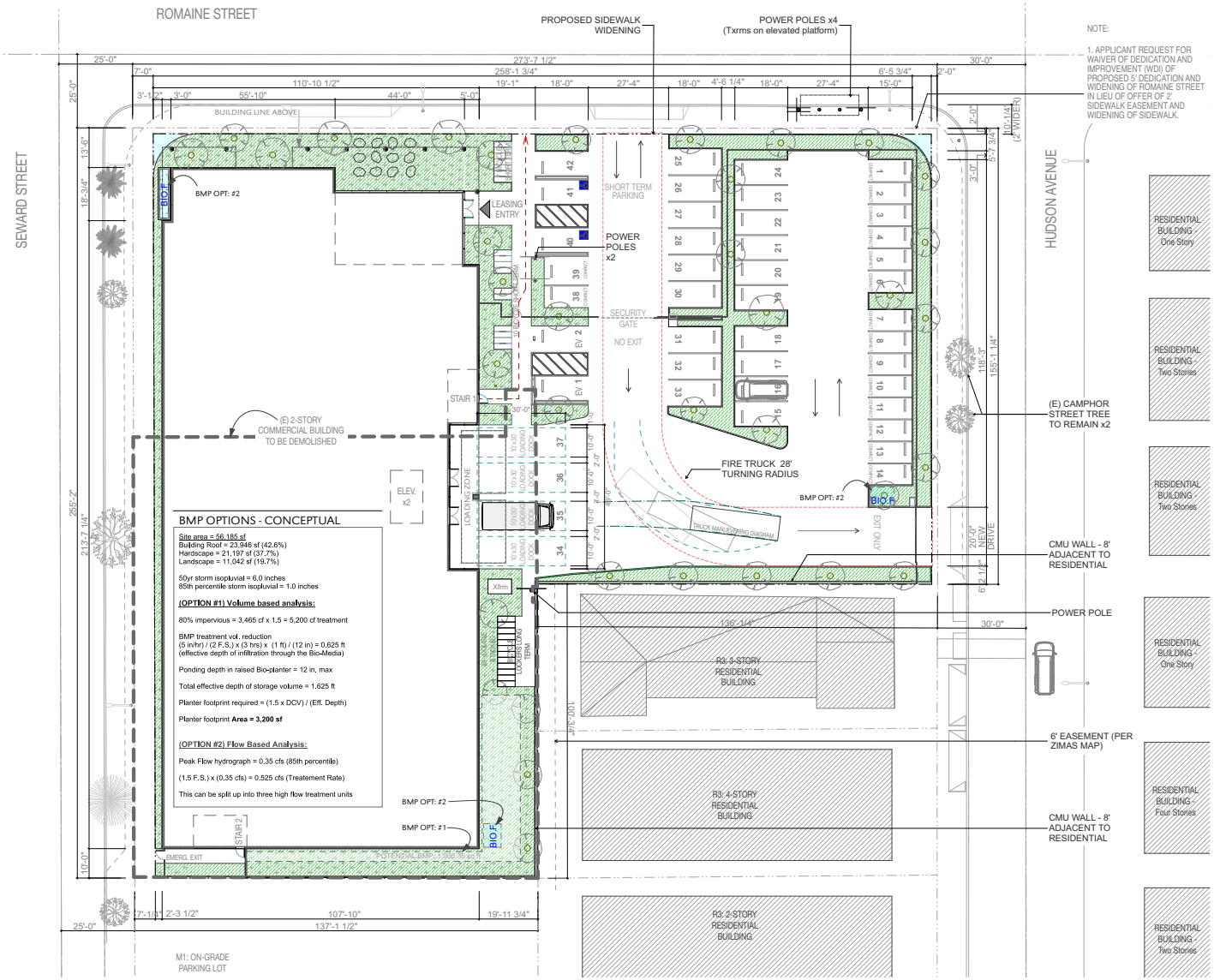
956 SEWARD STREET PROJECT

Kimley»Horn

SOURCE: Nearmap, 2023

N.T.S.

FIGURE 2: Aerial of the Project Site and Surrounding Uses



SOURCE: Michael W. Folonis Architects, 2023

N.T.S.

FIGURE 3: Site Plan

956 SEWARD STREET PROJECT

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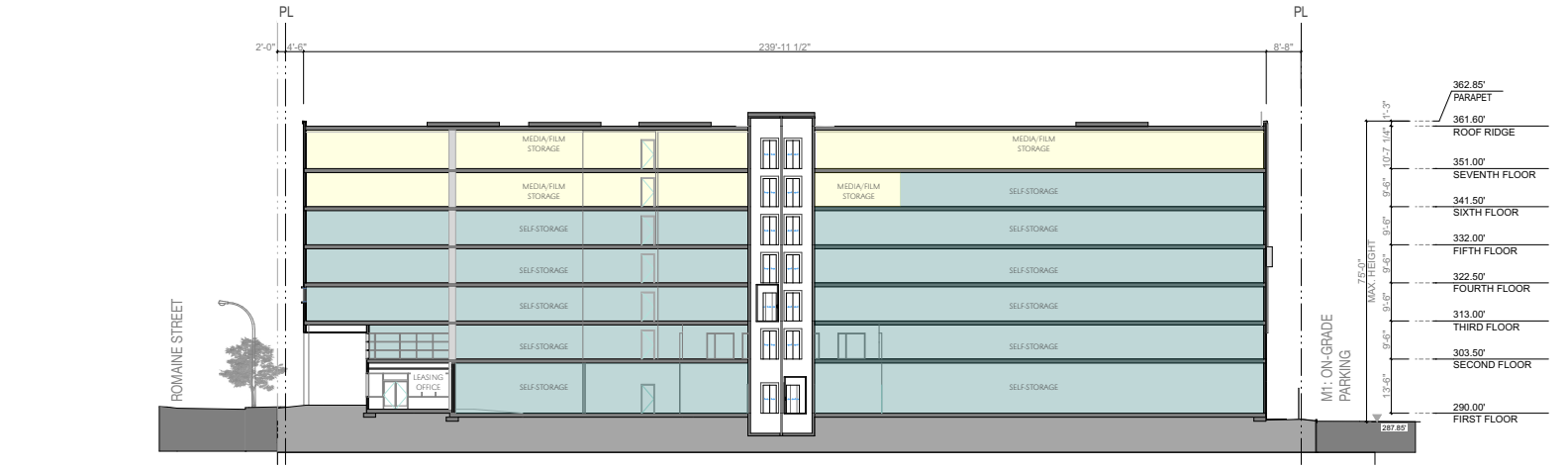
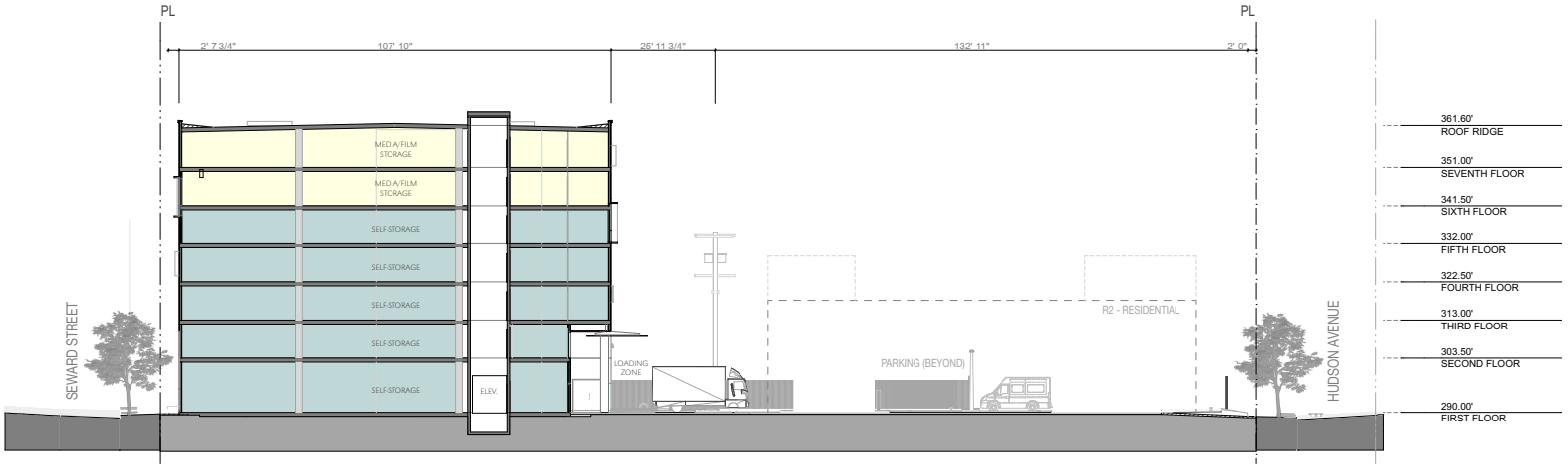


SECTION 2
1/16" = 1'-0"



SOURCE: Michael W. Folonis Architects, 2023

N.T.S.

FIGURE 4: Elevations

956 SEWARD STREET PROJECT

Kimley»Horn

SOURCE: Michael W. Folonis Architects, 2023

N.T.S.

FIGURE 5: Rendering Romaine Street

956 SEWARD STREET PROJECT

Kimley»Horn

SOURCE: Michael W. Folonis Architects, 2023

N.T.S.

FIGURE 6: Rendering Main Entryway

956 SEWARD STREET PROJECT

Kimley»Horn

SOURCE: Michael W. Folonis Architects, 2023

N.T.S.

FIGURE 7: Rendering Seward Street

956 SEWARD STREET PROJECT

Kimley»Horn

General Plan and Zoning

Under the current Hollywood Community Plan and the Los Angeles Municipal Code (LAMC), the land use designation for the entire Project Site is Limited Manufacturing. The Project Site is currently split zoned: the western five parcels fronting onto Seward Street are zoned MR1-1 and the eastern three parcels fronting on Hudson Avenue are zoned R3-1.

The MR1 zoning is consistent with the Project Site's Limited Manufacturing land use designation. The MR1 zone permits uses first permitted in the CM zone and in the C2 Zone, subject to a number of use restrictions. Allowable uses encompass a wide range of commercial uses, including retail, restaurants, hotels, certain types of office space, residential, mixed use, and studio uses. The R3-1 zone permits single-family dwellings, two-family dwellings, multiple dwellings, and related uses.

As part of the Project approval, the Project would be rezoned from MR1-1 and R3-1 to a uniform (Q)M1-2D. The proposed M1 zone is consistent with the Project Site's current land use designation of Limited Manufacturing and would be consistent with the Project Site's updated Limited Industrial land use designation per the Hollywood Community Plan Update (HCPU) currently in process.

On March 18, 2021, the Los Angeles City Planning Commission voted 5-3 to approve and recommend the Hollywood Community Plan Update to the City Council. Updates were subsequently made and released as a draft in August 2021. The City is still in its final steps of the adoption process and formal adoption of the Hollywood Community Plan Update. On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update. Following adoption of the Plan, the implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law. After this process is complete, the Hollywood Community Plan Update will be brought into effect by the City Council.

To be consistent with the Project Site's new zoning under the HCPU. The proposed "D" limitation would change the Project Site's current base FAR to 1.5:1 but with an allowable increase of up to 3:1 FAR for developments that provide 0.7:1 of total project FAR to media-related industrial uses, which include film archiving. The proposed "Q" Condition limits any proposed retail or restaurant uses to the ground floor with a 20,000-square foot size limit. The proposed M1 zoning would permit a storage building for household goods pursuant to a conditional use permit (CUP) when located within 500 feet from an A or R Zone or residential use.

Design and Architecture

The building is designed with a modern architectural style that features flat roofs, broken-up massing, a variety of window types, and landscaped areas throughout the Project area, including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue and Seward Street.

The Project is designed to be compatible in size and massing with existing land uses. The building is designed so that the façade is in harmony with the uses on all sides. The pedestrian entrance along the ground floor is oriented toward Romaine Street and Hudson Avenue to promote sidewalk activity along these streets. Further, access to the surface parking lot is provided along Romaine Street with an

additional exit-only access point on Hudson Avenue. No vehicular access is provided along Seward Street. This frontage design respects Romaine Street and Seward Street, which are developed with more studio and commercial uses and some residential uses. The Hudson Avenue frontage is set back behind the parking lot and landscaping, which serve as a buffer between the residential uses across Hudson Avenue.

Open Space and Landscaping

The Project would not include residential uses; therefore, no open space requirements would apply to the Project. However, the Project would provide approximately 7,534 sf of landscaped areas throughout the Project Site.

There are eight parkway trees and seven on the Project Site. The Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the removal/replacement (at a 1:1 ratio) of seven on-site trees. Six replacement trees will be planted in the adjacent parkway, and seven replacement trees will be planted on-site, a total of 13 replacement trees. As part of the overall development, the Project proposes to retain five trees and plant a total of 44 trees (eight parkway trees and 36 on-site trees) which is 31 more trees than is required for replacement trees (13 required replacement trees). None of the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. Furthermore, any removal of street trees would require approval from the City of Los Angeles Bureau of Street Services.

Access, Circulation, and Parking

The Project would provide access for all modes of travel, including pedestrians and cyclists. Vehicular access to the Project Site is currently provided by one driveway on N. Seward Street and two driveways on Romaine Street. The Project proposes to close the existing driveway on N. Seward Street and one driveway on Romaine Street. Vehicular access to the Project would be limited to two driveways: (1) one driveway along Romaine Street would provide two-way entry/exit to the parking lot and (2) the other driveway would provide a one-way exit to Hudson Avenue. There would be four on-site loading docks on the east side of the building. With the parking lot on the eastern half of the Project Site allows the proposed building to act as a buffer between the residential uses to the east. The parking lot would be landscaped to further buffer the parking lot from the residential uses.

Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. The main pedestrian entrance to the Project Site would be from a landscaped ground level entrance along Romaine Street.

As shown on **Table 2:** *Summary of Required and Proposed Vehicular and Bicycle Spaces*, the Project would provide 47 automobile parking spaces (inclusive of a 20 percent bicycle parking reduction) and 40 bicycle spaces at street level. Five parking spaces will be provided onsite for 826 North Seward Street pursuant to a covenant recorded with the Los Angeles County Recorder on October 16, 1972. The Project would include 40 bicycle parking spaces provided onsite at ground-level. The Project will also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

Table 2: Summary of Required and Proposed Vehicular and Bicycle Spaces

Building Use	Requirement/SF	Required Spaces	Proposed
Storage- First 10,000 sf	1/500	20	20
Storage - Remainder	1/5,000	32	22
Five Spaces per Covenant*		5	5
EV Spaces		4	4
20% Bicycle Reduction**	1 auto space/4 bicycle spaces	10	
Total Vehicle Parking Provided		57	47
Total Bicycle Spaces		34	40 (17 short-term bicycle parking and 23 long-term)

Notes:
sf = square feet
* Covenant 2675 recorded with the Los Angeles County Recorder on October 16, 1972.
** Pursuant to City Ordinance No. 185,480, new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces.

Lighting and Signage

The Project would install various exterior lights. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry and exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. All exterior lighting would meet applicable LAMC standards and be shielded or directed toward the areas to be illuminated.

Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, other than the leasing office component of the Project, the Project will not be open to the public. The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

The Project's leasing office will be open from 9:30 AM to 6:00 PM Monday through Friday, 9:00 AM to 5:30 PM on Saturday and closed on Sunday. The building will be accessible for customers from 6:00 AM to 10:00 PM each day of the week.

Sustainability Features

The Project would comply with the City's Green Building Code. The Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Project would install EV spaces, bike parking and storage, and low-flow water

fixtures. In addition, the Project would not install natural gas fire appliances. The Project would utilize drought tolerant landscaping and water efficient irrigation.

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

Anticipated Construction Schedule

Development of the Project would require the export of approximately 5,200 cubic yards of soil. All necessary utility improvements including water, sewer, and storm drain would be constructed within the property limits.

Construction is expected to begin in the first quarter of 2025 ending in 2026. The Project is expected to be operational in the first quarter of 2027. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The MND will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Zone Change and Height District Change pursuant to Los Angeles Municipal Code ("LAMC") Section 12.32-F to change the zoning of all parcels from MR1-1 and R3-1 to (Q)M1-2D.
- Conditional Use Permit pursuant to LAMC Section 12.24-W.50 for a storage building for household goods in the M1 zone within 500 feet from an A or R Zone or residential use.
- Site Plan Review pursuant to LAMC Section 16.05 to permit the development of a project that creates or results in an increase of 50,000 gross square feet ("sf") or more of nonresidential floor area.
- Waiver of Dedication and/or Improvements pursuant to LAMC Section 12.37-I.3 to waive the following dedications and improvements:
    - a) Seward Street: Waive 7-foot dedication and street widening requirement.
    - b) Romaine Street: Waive 5 feet of the required 7-foot dedication and street widening requirement. The Project proposes to dedicate 2 feet along Romaine Street for sidewalk widening.
    - c) Hudson Avenue: Waive 2-foot dedication and street widening requirement**.**

4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

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

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

Less Than Significant Impact. The Project is located in the Hollywood Community Plan area within the City of Los Angeles. The City of Los Angeles' General Plan Conservation Element defines scenic vistas as the panoramic public views that provide access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic resources. Panoramic public views within the Hollywood Community Plan area include views of the Santa Monica Mountains, the Hollywood Hills, and the Hollywood Sign. Adjacent to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available looking north from locations along north-south streets. Specifically, distant views of the Hollywood Hills and the Hollywood Sign are available from locations along N. Seward Street west of the Project Site and along N. Hudson Avenue east of the Project Site.

The Project Site consists of eight parcels that are currently improved with a two-story 40,000 sf media and film storage facility built in 1952 located on the southwestern portion of the Project Site and an associated surface parking on the northern portion of the Project Site currently used for a truck rental business. The Project Site area is not located within a designated Hillside Area and is predominantly flat. The current viewshed at the Project Site is characterized by existing urban development consisting of low- to mid-rise manufacturing, commercial, and residential uses. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed. The Project Site does not include any design features that would constitute a scenic resource or vista.

Once the Project is built, distant views of the Hollywood Hills and the Hollywood Sign would continue to be available in the vicinity of the Project Site on an intermittent basis along roadway segments, particularly north-south roadways. In particular, the Project would not block existing public views of the distant Hollywood Hills or Hollywood Sign from N. Seward Street or N. Hudson Avenue because the existing views are oriented north-south, and the Project Site is an infill location between these north-south streets. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are near the Project Site vicinity. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. There are no State-designated scenic highways in the Project Site vicinity.[2] The closest state scenic highway is State Route (SR)-2 north of the Interstate (I-210), located approximately 5.26 miles northeast of the Project Site. In addition, the nearest highways eligible for designation as state scenic highways are SR 187 located over 10 miles to the southwest of the Project Site and I-210 (Foothill Freeway) located over 10 miles to the northeast of the Project Site. As such, the Project would not substantially damage scenic resources within a state scenic highway. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is consistent with applicable zoning and other regulations governing scenic quality.

Consistency with Zoning

The Project Site is within the Hollywood Community Plan Area within the City and has a General Plan land use designation of Limited Manufacturing. The Project is currently split zoned. The western five parcels fronting on Seward Street are zoned MR1-1, and the eastern three parcels fronting on Hudson Avenue are zoned R3-1. The MR1 zoning is consistent with the Project Site's Limited Manufacturing land use designation. Allowable uses encompass a wide range of commercial uses, including retail, restaurants, hotels, certain types of office space, residential, mixed use, and studio uses.

Under the current version of the Hollywood Community Plan Update (HCPU) that is in the process of being implemented, the Project Site is included in Subarea 40:2. The HCPU would change the Project Site's land use designation from Limited Manufacturing to Limited Industrial, which is largely just a nomenclature change insofar as the same uses are allowed under the respective designations. The Project Site would be rezoned in its entirety to (Q)M1-2D. The Project Site's new land use designation would be consistent with the Project Site's new zoning. The new "D" limitation would change the Project Site's current base FAR to

[2] Caltrans, *California State Scenic Highway Systems Map,* https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed August 9, 2023.

1.5:1 but with an allowable increase of up to 3:1 FAR for developments that provide 0.7:1 of total project FAR to media-related industrial uses, which include film archiving. The proposed "Q" Condition limits any proposed retail or restaurant uses to the ground floor with a 20,000-square foot size limit. The proposed M1 zoning would permit a storage building for household goods pursuant to a CUP when located within 500 feet from an A or R Zone or residential use.

The Zone Change to (Q)M1-2D will allow the Project to facilitate the development of the new uses, which will bring new and much-needed services and media industry support spaces to the Hollywood community. Additionally, the Project will provide a self-storage use to serve the needs of the City's existing and future residents and studio uses. The Project will be visually compatible with surrounding current and future development and will accommodate a combination of uses that support the needs of the City's existing and future residents and businesses.

OTHER REGULATIONS GOVERNING SCENIC QUALITY: CITYWIDE GENERAL PLAN FRAMEWORK ELEMENT AND CITYWIDE DESIGN GUIDELINES

City of Los Angeles General Plan

The Citywide General Plan Framework Element (December 1996 and readopted in August 2001) provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to "Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm" (Objective 5.5).

The Project Site is located within the boundaries of the 1988 Hollywood Community Plan. The Hollywood Community Plan is one of the community plans that comprise the Land Use Element of the City of Los Angeles' General Plan and is intended to promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the Community, within the larger framework of the City. The Hollywood Community Plan does not contain specific design guidelines for the Project Site or storage uses.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City staff, developers, architects, engineers, and community members in evaluating project applications and relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were established to carry out common design objectives that maintain neighborhood form and character while promoting design excellence and innovative development solutions. The Citywide Design Guidelines are not intended to supersede the LAMC and/or other regulatory documents such as specific plans and overlays, which may contain design guidelines that better address the specific needs of different geographic areas and communities. As such, in cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines, the community-specific requirement will prevail.[3] Additionally, as stated in the Citywide Design Guidelines, although each of the objectives and corresponding guidelines should be considered in a project, not all of them will be

[3] City of Los Angeles Department of City Planning, Citywide Design Guidelines, adopted by the City Planning Commission on October 24, 2019.

appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."[4]

In October 2019, the City Planning Commission adopted a new set of Citywide Design Guidelines that consolidates the guidelines for three project types into a single document in order to establish a more efficient and effective design review process. The new set includes adopted City policies and up-to-date design solutions that were not previously considered, plus input from various City departments including the Department of Building and Safety, Bureau of Engineering, Cultural Affairs, and the Mayor's Sustainability and Resiliency teams.[5]

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

The Project would improve the pedestrian experience by providing additional street trees and on-site trees compared to existing conditions. The Project does not contain residential uses; therefore, no open space requirements would apply to the Project. However, the Project would provide approximately 7,534 sf of landscaped areas throughout the Project Site including an outdoor landscaped walkway and entrance along Romaine Street and landscaping along Hudson Avenue t and Seward Street.

As part of the overall development, the Project proposes to retain five trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees). The Project would also provide adequate lighting for security and wayfinding purposes. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

The Project would provide access for all modes of travel, including pedestrians and cyclists. The Project would encourage pedestrian circulation at the street level, in part through the orientation of the proposed new building, through enhanced landscaping, and through the Project's design features aimed at providing a pedestrian-oriented streetscape, particularly along Romaine Street. The Project's entrance along Romaine Street promotes pedestrian activity by placing the entrance at grade-level with unobstructed views of the public right-of-way.

The Project proposes to provide 47 automobile parking spaces on site within the surface-level parking lot. To avoid disrupting the streetscape along the perimeter of the Project Site, the Project only proposes vehicular entrances into the surface parking lot from Romaine Street. Vehicular exits are provided for on Romaine Street and Hudson Avenue. No vehicular access is proposed along Seward Street.

The Project's location is in a transit-rich area with numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project, including Metro Line 4 and Metro Line 210. The Project would also help connect Project employees and visitors to the surrounding neighborhood, thereby encouraging the pedestrian experience and convenient access to transit.

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

[4] City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.

[5] City of Los Angeles City Planning Commission, Recommendation Report, Case No. CPC-2019-1098-MSC, October 24, 2019.

The Project would not be open to the general public. However, the Project would also provide landscaping along Romaine Street and along Seward Street as well as trees within the surface parking areas and between the Project and the adjacent residential uses to the east. Furthermore, the massing of the building is consistent with the massing of the existing sound stages, recording studios, offices, and parking garages to the north, west, and south of the Project Site. To ensure that the Project is harmonious with the surrounding neighborhood, the building would be located on the west half of the Project Site. The uses to the east of the Project Site are lower in intensity and generally comprised of apartment buildings. The Project has included a parking lot on the eastern half of the Project Site. This allows the proposed building to act as a buffer between the residential uses to the east, and it creates a lower intensive environment along the eastern portion of the Project Site adjacent to the residential uses. The parking lot would be landscaped to visually buffer the parking lot from the residential uses.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project would be complementary to the local area context, the relationships with adjacent buildings and the quality and functionality of the urban fabric. The building is designed with a modern architectural style that features flat roofs, broken-up massing, a variety of window types, and a landscaped entrance to enhance the pedestrian-oriented streetscape along Romaine Street. The massing of the building is consistent with the urban fabric of existing development surrounding the Project. The Project would also provide landscaping along Romaine Street and along Seward Street as well as new trees within the surface parking areas and between the Project and along the adjacent streets.

Guideline 5: Express a clear and coherent architectural idea

The Project would express a clear and coherent architectural idea. The building is designed with a modern architectural style that features flat roofs, broken-up massing, windows, and a landscaped entrance to enhance the pedestrian-oriented streetscape along Romaine Street. The Project is designed with the current neighboring uses to ensure the Project's compatibility with the surrounding environment. The massing of the building is consistent with the massing of the existing sound stages, recording studios, offices, and parking garages to the north, west, and south of the Project Site.

The proposed building is designed so that the façade is in harmony with the uses on all sides. The pedestrian entrance along the ground floor is oriented toward Romaine Street and Hudson Avenue to promote sidewalk activity along these streets. Further, access to the surface parking lot is provided for along Romaine Street with an additional exit-only access point on Hudson Avenue. No vehicular access is provided along Seward Street. This frontage design respects Romaine Street and Seward Street, which are developed with more studio and commercial uses and some residential uses. The Hudson Avenue frontage is set back behind the parking lot and landscaping, which serve as a buffer between the residential uses to the south of the Project Site and across Hudson Avenue.

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

The Project would provide landscaping along Romaine Street and along Seward Street as well as new trees within the surface parking areas and between the Project and along the adjacent streets. The Project would feature a contemporary style and would include an attractively designed landscaped entry way.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized and developed area of the City and the Project Site does not contain expansive natural areas or substantial landscaping. However, the Project is designed with a landscaped outdoor entry way. The landscaped areas are provided to improve urban greenery in the neighborhood.

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

The Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code. The Project's design is based on principles of smart growth and environmental sustainability.

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

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and to implement standard erosion controls to limit stormwater runoff.

Overall, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and the Citywide Design Guidelines regarding scenic quality. The Project Site is not located within the boundaries of or subject to any Specific Plan or Community Design Overlay. As such, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, the nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[6] Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant, and no mitigation measures are required.

Operation

Light

The Project Site consists of eight parcels that are currently improved with a two-story 40,000 sf film storage facility built in 1952 and an associated surface parking lot currently used for a truck rental business which contain nighttime security lighting. The Project Site is also located in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passthrough windows).

The Project would introduce new sources of light and glare that are typically associated with a storage building, including architecture, interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate building

[6] LAMC Chapter 9, Article 3, Section 93.0117 provides that, no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

entrances, parking areas, and internal roadways and walkways. The nearest sensitive receptors in the vicinity of the Project Site are the multi-family residences to the east of the Project Site, and along Hudson Avenue and residential uses to the north. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

The Project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project in accordance with LAMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses.

Therefore, impacts would be less than significant, and no mitigation measures are required.

Glare

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project Site currently contains a surface parking lot and storage facility and truck rental office constructed of various non-reflective materials. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of the Project would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The Project building would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades.

Based on the above, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

With the exception of the 1000 Seward Mixed Use Project, all of the related Projects are at a distance that they would not share the same viewshed would not have a potential to combine with the Project to create a cumulative aesthetics impact. No scenic vistas are available from the Project Site and the Project would not result in any cumulative impacts related to scenic vistas when combined with the 1000 Seward Mixed Use Project. Similar to the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding, building heights, setbacks, massing, and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density and design, glare and light.

Lastly, the Project would result in less-than-significant aesthetics impacts and thus would not contribute considerably to cumulative aesthetics impacts. For all these reasons, cumulative aesthetics impacts would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located in a highly urbanized setting and is currently developed with existing buildings and surface parking. No agricultural uses, or related farmland operations, are present within the Project Site or surrounding area.

The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[7] The urban character of the Project Site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contractual agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site currently includes two zones. The western five parcels fronting onto Seward Street is zoned MR-1 and the eastern three parcels fronting on Hudson Avenue are zoned R3-1. Accordingly, the Project Site is not zoned for agricultural use nor are there agricultural uses occurring on or in the vicinity of the Project Site. The Project Site is not zoned for agricultural uses presently and would not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The Project Site is zoned MR-1 and R3-1 and has a General Plan Land Use designation of Limited Manufacturing. In the City, forest land is a permitted use in areas zoned OS (Open Space) and no forest land exists on the Project Site. The City does not have specific zoning for timberland or timberland production; however, the Project Site is currently developed with a sf film storage building, truck rental uses, and associated surface parking and does not include timberland or timberland production uses. As such, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. No forest land exists at the Project Site. In addition, the surrounding vicinity is developed with residential, industrial, studio, commercial, and office uses in a developed area of the City. Accordingly, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The Project Site is located in an urban area of the City and is currently developed with a 40,000 sf film storage building, truck rental uses, and associated surface parking. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The

[7] State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 3, 2023.

Project would construct a new self-storage building and associated parking uses. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

No agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects proposes converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

4.3 AIR QUALITY

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

The analysis is based on the information provided in the *956 Seward Project Air Quality Assessment,* prepared by Kimley-Horn, December 2023 and in Appendix A.

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

Less Than Significant Impact. As part of its enforcement responsibilities, the Environmental Protection Agency (EPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.[8] The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone

[8] South Coast Air Quality Management District, *2022 Air Quality Management Plan, page ES-2,* December 2022. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan.

National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1:** The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and National Ambient Air Quality Standards (NAAQS).[9]

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown below (see **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**, and **Error! Reference source not found.**), the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts (SCAG's 2020-2045 RTP/SCS). SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[10] Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs.[11] A storage facility of this size would typically employ up to two people. Representing 0.001 percent of this increase, the Project's employee increase would be within local and

[9] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.
[10] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[11] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.

regional employment projections. The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Project. Thus, the Project would also be consistent with the AQMP under the second criterion.

As an infill development, the Project advances goals of the AQMP and RTP/SCS to reduce VMT and related vehicle emissions. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.[12] The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
    - **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- **Goal 4:** Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
    - **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT with the co-benefit of decreasing pollutant emissions from mobile sources. In addition, the Project includes short- and long-term bicycle parking spaces as required by the LAMC and is well-served by transit including local bus lines. The Project would provide opportunities for the use of alternative

[12] Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

modes of transportation, including convenient access to public transit, opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options.

The analysis above is based on the Project's consistency with the AQMP as well as the City of Los Angeles' Air Quality Element goals, objectives, and policies that are relevant to the Project. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with the growth projections that form the basis of the 2016 AQMP, the Project would be consistent with the emission forecasts in the AQMP. Furthermore, with adherence to the regulatory requirements identified above, no significant air quality impacts would occur and as such, no mitigation measures are necessary for the Project to meet this AQMP consistency criterion. As the Project would support the City's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures.

Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. Therefore, impacts would be less than significant, and no mitigation measures are required.

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?

South Coast Air Quality Management District Thresholds

Less Than Significant Impact. The SCAQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM_{10}), and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$). The thresholds apply to both construction and operation for projects located within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. If a project proposes development that would result in criteria pollutant emissions in excess of the established thresholds, as outlined in

Table 3: *South Coast Air Quality Management District Significance Thresholds,* a significant air quality impact may occur, and additional analysis warranted to fully assess the significance of impacts.[13]

Table 3: South Coast Air Quality Management District Significance Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter up to 10 Microns (PM_{10})	150	150
Particulate Matter up to 2.5 Microns ($PM_{2.5}$)	55	55
Sulphur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550
1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.		
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, April 2019.		

Regional Construction

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the South Coast Air Basin include ozone-precursor pollutants (i.e., ROG and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions of these criteria pollutants are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Construction would result in the temporary generation of criteria pollutant emissions from activities such as demolition, site grading, building construction, architectural coating, motor vehicle exhaust associated with construction equipment, materials deliveries and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Fugitive dust emissions would result from demolition and construction activities. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water. Mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Construction activities for the Project were assumed to begin in January 2025. Construction-generated emissions associated with the proposed Project were calculated using the California Air Resources Board (CARB)-approved California Emissions Estimator Model (CalEEMod), version 2022.1.1.21, which is designed to model emissions for land use development projects, based on typical construction

[13] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

requirements. It is assumed that all construction equipment operated during each individual phase would be operated simultaneously to provide a conservative analysis. **Table 4:** *Project Construction Equipment,* shows the equipment required for each construction phase and the number of hours per day they would be used. See **Appendix A**, for more information regarding the construction assumptions used in this analysis.

Table 4: Project Construction Equipment

Construction Phase	Equipment	Quantity	Numbers of Hours Used per Day
Demolition	Tractor/Loader/Backhoe	2	8
	Excavator	1	8
Grading	Excavator	1	8
	Tractor/Loader/Backhoe	1	7
Building Construction	Crane	1	6
	Forklifts	1	6
	Pumps	1	8
	Tractor/Loader/Backhoe	1	6
	Air Compressor	1	8
	Cement and Mortar Mixer	1	8
	Welder	1	8
Paving	Paver	1	6
	Roller	1	7
	Cement and Mortar Mixer	1	8
Architectural Coating	Air Compressor	1	6
	Aerial Lifts	3	6

Source: Equipment provided by Project Applicant. Hours of operation based on CalEEMod defaults.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 5**: *Project Construction Emissions.* As noted in **Table 7**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures.

Table 5: Project Construction Criteria Pollutant Emissions

Construction Year	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1 (2025)	1.32	9.56	14.80	0.02	1.69	0.60
Year 2 (2026)	25.65	9.14	13.59	0.02	1.57	0.57
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix A for Model Data Outputs.

Source: CalEEMod version 2022.1.1.21. Refer to Appendix A for model outputs.

The results summarized on **Table 5** show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds.

The Project proposes Project Design Feature AQ-PDF-1, which would reduce the Project's diesel exhaust construction emissions by requiring that all off-road diesel-powered construction equipment greater than 90 horsepower meet CARB Tier 4 Final off-road emissions standards.

PDF AQ-1 **Off-Road Diesel-Powered Construction Equipment.** All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

Project construction would also comply with SCAQMD Rules 402 (Nuisance)[14] and 1113 (Architectural Coatings)[15] and CARB's anti-idling regulations which prohibit idling for more than five minutes; however, to be conservative, compliance with these rules also was not assumed when estimating the Project's construction emissions for **Table 5**, above. Therefore, the Project's maximum-day construction emissions of criteria pollutants would be even lower than reported in **Table 5** if the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations and PDF-1 were taken into account.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds. Therefore, impacts would be less than significant, and no mitigation measures are required.

Regional Operations

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. **Table 6**: *Operational Emissions,* summarizes the operational emissions attributable to the proposed Project. Emissions from existing uses on the Project Site would be minimal, and credit has not been taken for their removal.

As shown in **Table 6**, the Project's operational criteria pollutant emissions would not exceed SCAQMD thresholds. Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 6: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day)[1, 2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project						
Area	5.37	0.07	8.07	<0.01	0.01	0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	1.04	0.87	9.24	0.02	2.05	0.53
Proposed Project Total	**6.41**	**0.94**	**17.31**	**0.02**	**2.06**	**0.54**
SCAQMD Threshold	55	55	550	150	150	55

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

[15] SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.

SCAQMD Threshold Exceeded?	No	No	No	No	No	No
1. Emissions were calculated using the California Emissions Estimator Model version 2020.4.0 (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.						

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Impacts

The nearest sensitive receptors to the Project Site are the residential units located immediately adjacent to and to the south of the Project Site. To assess the potential for Project construction to create impacts to sensitive receptors, the SCAQMD recommends utilizing its Localized Significance Thresholds (LSTs) for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.[16] The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 7:** *Equipment-Specific Grading Rates* was used to determine the maximum daily disturbed acreage for the LST analysis. For this Project, the appropriate source receptor area (SRA) for the LSTs is the Central LA (SRA 1) area since this area includes the Project Site. LSTs only take into consideration emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$.[17] The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size.[18] Based on the daily equipment modeled in CalEEMod, Project construction is anticipated to disturb approximately 1 acre in a single day. Thus, the LSTs applicable to this Project uses the SCAQMD-produced look up tables for a 1-acre site.

Table 7: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Backhoe	1	0.5	8	0.5
	Grader	0	0.5	8	0
	Front Loader	0	0.5	8	0
				Total Acres Graded per Day	**1**
Source: CalEEMod version 2022.1.1.21.					

[16] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed December 2022.

[17] Ibid.

[18] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, Accessed December 2022.

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."[19] Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on a construction site acreage of one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are residences located directly south of the Project Site boundary. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Project Site.[20] Therefore, the LSTs for 1 acre at 25 meters were used for the construction analysis, which is consistent with the SCAQMD LST methodology.

Table 8: *Localized Significance of Construction Emissions,* presents the emissions modeling results for the Project's localized emissions during each phase of construction at the nearest sensitive receptor adjacent to the south of the Project Site. All on-site construction activity has been evaluated and is shown in **Table 8** To be conservative, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for **Table 8**. Therefore, the Project's maximum-day localized construction emissions would actually be even lower than reported in **Table 8** shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not be expected to create substantial concentrations of pollutants at the sensitive receptors closest to the Project Site or cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, impacts would be less than significant, and no mitigation is required.

Table 8: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1,2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition (2025)	3.03	4.83	1.19	0.27
Grading (2025)	2.21	4.96	0.10	0.09
Building Construction (2025)	8.04	8.85	0.31	0.28
Building Construction (2026)	7.70	8.78	0.28	0.25
Paving (2025)	2.38	2.74	0.11	0.10
Architectural Coating (2026)	2.48	2.87	0.03	0.03
Maximum Daily Emissions	8.04	8.85	1.19	0.28
SCAQMD LST (for 1 acre at 25 meters)	74	680	5	3
Maximum Daily Emissions Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. CalEEMod version 2022.1.1.21. Worst-case seasonal maximum daily emissions are reported.
2. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment.

[19] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed December 2023.

[20] Ibid.

Localized Operational Impacts

According to the SCAQMD localized significance threshold methodology, operational LSTs apply only to on-site sources.[21] LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The 2.0-acre LST threshold was conservatively used for the Project Site.[22] The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in **Table 9:** *Localized Significance of Operational Emissions*.

Table 9: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1, 2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions (Area and Energy Sources)	0.07	8.07	0.01	0.01
SCAQMD Localized Screening Threshold (adjusted for 1 acre at 25 meters)	*74*	*680*	*2*	*1*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Emissions were calculated using the California Emissions Estimator Model version 2022.1.1.21 (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. On-site emissions consist of area sources and energy sources.

The operational emissions shown on **Table 9** include all on-site Project-related sources (i.e., area and energy). As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations have not been assumed when estimating the Project's localized operational emissions for **Table 9.** Therefore, the Project's maximum-day localized operational emissions would in fact be even lower than reported in **Table 9**. The results of the LST analysis show that the Project would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, impacts would be less than significant, and no mitigation measures are required.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection as a result of Project activities would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 *Air Quality Management Plan* and the 1992 Federal

[21] Ibid.

[22] Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1.5 acres. For operations, the size of the Project Site has been used.

Attainment Plan for Carbon Monoxide (1992 CO Plan).[23,24] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. The Basin was re-designated as attainment in 2007 and CO is no longer addressed in the SCAQMD's Air Quality Management Plan (AQMP).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

The 2003 *Air Quality Management Plan* is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[25] The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard.

By contrast, the proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. According to daily traffic volume data, Seward Street between Romaine and Willoughby has an existing vehicle count of 1,354, Romaine Street between Seward and Hudson has an existing vehicle count of 1,456, Hudson Avenue between Romaine and Willoughby has an existing vehicle count of 969, and Willoughby Avenue between Seward and Hudson has an existing vehicle count of 5,312. As CO hotspots were not created at the Wilshire Boulevard/ Veteran Avenue intersection even as it accommodated 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the Project Site from an additional 314 daily vehicle trips attributable to the Project. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and

[23] South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.
[24] South Coast Air Quality Management District*, Federal Attainment Plan for Carbon Monoxide*, 1992.
[25] South Coast Air Quality Management District, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

fiberglass molding.[26] The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors would be temporary, would be typical of construction projects, and would disperse rapidly. Furthermore, odors that could be generated by construction activities are required to follow SCAQMD Rule 402 (Nuisance) to prevent odor nuisances on sensitive land uses. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Cumulative Short-Term Emissions

The South Coast Air Basin (SCAB) is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for national standards. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.[27] The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown above, Project construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the proposed Project would not result in a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. As discussed above, the Project is consistent with the AQMP and the City's General Plan. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal

[26] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

[27] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, Accessed December 2022.

or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, NO_2, PM_{10}, and $PM_{2.5}$, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts.

Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted AQMP. The Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP. Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.[28]

As shown above, the Project operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not result in an incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable. Therefore, impacts would be less than significant, and no mitigation measures are required.

[28] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, Accessed December 2022.

4.4 BIOLOGICAL RESOURCES

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

The following discussion regarding biological resources is based, in part, on the *Seward Street Development: City of Los Angeles Tree Report,* prepared by Rincon Consultants, Inc., dated November 2023 and contained in **Appendix B**.

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

Less than Significant Impact. The Project Site is located in an urbanized and developed area of the City and is currently developed with storage and truck rental uses. The Project Site does not contain any

habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). [29, 30, 31] Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state or federally listed species. Species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings.

The City's Preservation of Protected Trees Ordinance No. 186873 (Protected Tree Ordinance) and the LAMC §§46.00-46.06 defines protected trees as any of the following southern California native tree species measuring 4 inches or more in cumulative diameter at 4.5 feet above the ground level at the base of the tree: Oak trees including valley oak (Quercus lobata), California live oak (Quercus agrifolia), or any of tree of the oak genus indigenous to California but excluding scrub oak (Quercus berberidifolia); southern California black walnut (Juglans californica); western sycamore (Platanus racemosa); and California bay (Umbellularia californica), and protected shrubs, including Mexican elderberry (Sambucus Mexicana) and toyon (Heteromeles arbutifolia). In accordance with the Protected Tree Ordinance, no person shall relocate or remove any protected tree without obtaining a permit from the City.

In addition, the City requires a permit for removal or cutting of any tree (regardless of size) in or upon any street or parkway in the City, per LAMC § 62.171 of the City's Municipal Code. To apply for this permit, all city trees proposed for removal must be highlighted and color photos of each tree provided. Typically, an inventory of "significant" trees is required by the City Planning Department for development permits. A significant tree includes any non-protected tree with a cumulative trunk diameter of 8 inches or more.

The tree survey for the Project Site found eight parkway trees in the adjacent right-of-way, and seven significant trees on-site. The survey did not find any protected trees (listed in the City's Preservation of Protected Trees Ordinance No. 186873) on-site, nor within 50 feet of the Project Site. Specifically, the Project Site contains seven on-site significant trees on its eastern border, which are all weeping fig trees (Ficus benjamina). The Project's sidewalk expansion by two feet of width overlaps with the trunk locations of these seven significant trees, therefore removal of these trees is unavoidable. These trees will be required to be replaced on-site at a 1:1 ratio.

The adjacent Seward Street parkway contains six parkway trees. Five trees in the parkway are in good condition and are proposed for retention and protection, including two Canary Island date palm (Phoenix canariensis) trees, two Brisbane box (Lophostemon confertus) trees, and one jacaranda tree. One lemon bottlebrush (Jacaranda mimosifolia) tree in the parkway is in poor condition and is proposed for removal and are required to be replaced at a 2:1 ratio within Project Site adjacent parkway.

[29] Los Angeles County Department of Regional Planning, Planning & Zoning Information https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed: October 17, 2023.

[30] California Department of Fish and Wildlife, Natural Community Conservation Plans/Habitat Conservation Plans. Available online https://wildlife.ca.gov/conservation/planning/nccp/plans, accessed: October 17,2023.

[31] U.S. Fish and Wildlife Service, National Wetlands Inventory.www.fws.gov/wetlands/Data/Mapper.html, accessed: October 17,2023.

The adjacent Hudson Avenue parkway contains two parkway trees. The two camphor (Cinnamomum camphora) trees in this parkway are both in poor condition and are proposed for removal and required are to be replaced at a 2:1 ratio.

In summary, the Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the removal/replacement (at a 1:1 ratio) of seven on-site significant trees. Six replacement trees will be planted in the adjacent parkway, and seven replacement trees will be planted on-site, a total of 13 replacement trees. All replacement trees will be of the 24-inch box size at a minimum, and parkway replacement tree species selection will conform to the City's "Street Tree Selection Guide." In total, the Project proposes to retain five trees, remove ten trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees) which is greater than is required for replacement trees (13 required replacement trees).

While the Project would provide more trees than occur under existing conditions, the ten trees removed by the Project could potentially have provided nesting sites for migratory birds; therefore, removal of one or both of these trees could potentially create an adverse effect on migratory birds. However, all migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13), and by Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA and state protections through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The Project would be required to comply with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the Project's removal of the existing street trees. As a standard practice, the Department of Building and Safety requires the enforcement of regulatory compliance measure RCM-BIO-2, compliance with which would avoid any potential impacts related to nesting birds during construction activities. Therefore, with adherence to the requirements of existing laws and regulations, the Project would have a less than significant impact on sensitive biological species or habitat, and no mitigation measures are required.

Regulatory Compliance Measures

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on-site.

RCM-BIO-2: Proposed Project 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 Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) 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.
- 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 (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) 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.
- 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.

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?

No Impact. The Project Site is located within a developed, urban portion of the City and no watercourses, riparian habitat, including wetlands,[32] or other sensitive natural communities, such as Significant Ecological Areas or Coastal Resource Areas,[33] exist or are mapped on or near the Project Site. Since neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. As such, the Project would not have the potential to adversely affect riparian habitat or other sensitive natural communities. Therefore, no impact would occur, and no mitigation measures are required.

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?

No Impact. As previously discussed, no wetlands exist or are mapped on or near the Project Site.[34] In addition, the Project does not propose any filling or grading of any ravines or other hydrologically low-lying areas that may contain intermittent waterbodies. As such, the Project would not have the potential

[32] Los Angeles County. Significant Ecological Areas and Coastal Resource Areas Policy Map. Available: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. accessed: September 9,2023.
[33] California Department of Fish and Wildlife. California Regional Conservation Plan. August 2015. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed: September 9,2023.
[34] U.S. Fish and Wildlife Service, National Wetlands Inventory. www.fws.gov/wetlands/Data/Mapper.html, accessed: September 9,2023.

to affect wetlands. As discussed above, no riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Thus, implementation of the Project would not result in any adverse impacts to state or federally protected wetlands such as marshes vernal pools, or coastal areas. Therefore, no impact would occur, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is currently developed and is located in a highly urbanized area in the City. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Furthermore, due to the urbanized nature of the Project Site area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible. Nonetheless, the onsite and parkway trees surrounding the Project Site include non-native trees that could support raptor and/or songbird nests. The Project proposes to remove and replace these trees. The three parkway trees proposed for removal are required to be replaced at a 2:1 ratio (six replacement trees). The Project would plant eight parkway trees total, which is two more than is required (six parkway replacement trees).

The seven on-site significant trees proposed for removal are proposed to be replaced at a 1:1 ratio (seven replacement trees) within the Project Site). As part of the overall development, this Project proposes to retain five trees and plant a total of 44 trees (eight parkway trees and 36 on-site trees) which is 31 more trees than is required for replacement trees (13 required replacement trees).

The Project would be required to comply with the Migratory Bird Treaty Act (MBTA) and state laws, which would reduce its potential impacts to migratory bird species that could potentially nest in the two trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. As such, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, the Project's potential impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact.

As discussed earlier, the Tree Survey for the Project Site found eight parkway trees in the adjacent right-of-way, and seven significant trees on-site. A significant tree includes any non-protected tree with a cumulative trunk diameter of 8 inches or more. The survey did not find any protected trees (listed in the City's Preservation of Protected Trees Ordinance No. 186873) on-site, nor within 50 feet of the Project Site.

Specifically, the Project Site contains seven on-site trees on its eastern border, all weeping fig trees (Ficus benjamina) maintained as a hedge. The Project's sidewalk expansion by two feet of width overlaps with

locations of these seven significant trees, therefore removal of these trees is unavoidable. These trees would be required to be replaced on the Project Site at a 1:1 ratio.

The adjacent Seward Street parkway contains six parkway trees. Five trees in the parkway are in good condition and are proposed for retention and protection, including two Canary Island date palm (Phoenix canariensis) trees, two Brisbane box (Lophostemon confertus) trees, and one jacaranda tree. One lemon bottlebrush (Jacaranda mimosifolia) tree in the parkway is in poor condition and is proposed for removal and would be required to be replaced at a 2:1 ratio within the adjacent parkway.

The adjacent Hudson Avenue parkway contains two parkway trees. The two camphor (Cinnamomum camphora) trees in this parkway are both in poor condition and are proposed for removal and would be required to be replaced at a 2:1 ratio.

In summary, the Project proposes the retention and protection of five parkway trees; the removal/replacement (at a 2:1 ratio) of three parkway trees, and the removal/replacement (at a 1:1 ratio) of seven on-site significant trees. Six replacement trees would be required to be planted in the adjacent parkway, and seven replacement trees would be required to planted for a total requirement of 13 replacement trees. All replacement trees will be of the 24-inch box size at a minimum, and parkway replacement tree species selection will conform to the City's "Street Tree Selection Guide." As part of the overall development, the Project proposes to plant a total of 38 trees (eight parkway trees and 30 on-site trees) which is 31 more trees than is required for replacement trees (13 required replacement trees).

The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (RCM-BIO-1). The Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds (RCM-BIO-2).

Thus, the Project's potential impacts related to the loss of on-site and parkway trees would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is currently developed and located in an urbanized area of the City. As discussed above, there are no identified Significant Ecological Areas (SEAs) on the Project Site or within the vicinity of the Project Site,[35] and the Project Site is not subject to any Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[36] As such, the Project would not conflict with the provisions of an adopted Habitat Conservation

[35] City of Los Angeles, General Plan Conservation Element, Adopted September 26, 2001, Exhibit B2.
[36] City of Los Angeles, Zone Information and Map Access System (ZIMAS), available at: http://zimas.lacity.org.

Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur, and no mitigation measures are required.

Cumulative Impacts

The Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site and no special-status wildlife or fish species are considered to have a moderate or high potential for occurrence in the Project Site area, the Project would not remove protected trees, and the Project would not conflict with the provisions of an habitat conservation plan, Natural Community Conservation Plan or other such plan. The Project would also be required to comply with the Migratory Bird Treaty Act (MBTA) and state laws, which would reduce its potential impacts to migratory bird species. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites.

In addition, as with the Project, the related projects would be required to comply with the City's Protected Tree Ordinance, the Migratory Bird Treaty Act, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce/avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

4.5 CULTURAL RESOURCES

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

The following discussion regarding Cultural Resources is based, in part, on the technical report prepared for the Project, entitled *936-962- Seward Street, 949-959 Hudson Avenue Historical Resources Technical Report* (Historic Report), prepared by GPA Consulting, November 2023 and contained in **Appendix C**. Archeological resources are evaluated in the *Archaeological Resources Assessment 956 Seward Project,* prepared by Kimley-Horn, December 2023 (**Appendix C**).

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

Less than Significant Impact.

Project Site

The Project Site is occupied by a two-story industrial building with a one-story maintenance room. The first portion of the existing building was constructed in 1951-1952. Through the 1950s, several separate buildings were added. In 1967, construction of a second-story addition combined all the buildings, except for the maintenance room into one larger building. As such, the building has an effective year built of 1967. It was originally associated with Harry and Ben Teitelbaum for their business, the Editing Film Center. The industrial building has been used as climate-controlled storage vaults for film reels since its construction. The industrial building is two stories in height with a one-story, rectangular addition located on the north elevation. The industrial building has a flat roof with a shallow, capped parapet and the exterior of the building is clad in a combination of stucco, scored concrete, and brick veneer. Because the building has historically been used as a climate-controlled film storage vault, there are no windows present on the building.

The building is now occupied by a company called Climate Controlled Vaults that continues to use the building as storage for film reels and documents. An interior office is rented to Avon Rent-A-Truck.

Historic Resources in the Vicinity

There are two previously identified historical resources in the vicinity of the proposed Project to the north: 1012 N. Seward Street and Hollywood Center Studios. These are described below:

- **1012 N. Seward Street** is an industrial building located on the east side of N. Seward Street and was constructed in 1953. The industrial building is two stories in height with a rectangular plan and its west elevation abuts the sidewalk along N. Seward Street. Signage in the center of the west elevation and reads "Sunset Las Palmas Studios." The building was identified during a SurveyLA survey and was assigned a status code of 3S/3CS/5S3, indicating that it appeared eligible for national, state, and local listing as "an excellent and very rare example of a 1950s purpose-built film vault in the entertainment industry support services area of Hollywood."
- **Hollywood Center Studios** (now Sunset Las Palmas Studios) is located on a superblock bound by Romaine Street to the south, N. Seward Street to the east, N. Las Palmas Avenue to the west, and a row of buildings fronting Santa Monica Boulevard to the north. The studio property was identified during a SurveyLA survey and recorded as a historic district. It was assigned a status code of 3S/3CS/5S3, indicating that it appeared eligible for national, state, and local listing as an excellent example of an independent studio facility in Hollywood. The studio is not accessible to the public so contributing and non-contributing features of the district were not identified.

The Project Site and the above addresses are also partially located within the boundaries of the Entertainment Industry Support Services Planning District; however, planning districts may "merit consideration in local planning," but do not meet eligibility standards for historic designation.[37]

Direct Impacts Evaluation

As concluded in the Historic Report, the Project would not cause direct impacts to historical resources. Research did not reveal evidence to suggest that the building was especially unique or significant in the history of entertainment industry support services. Rather, it appears to be one of several similar, standard film storage facilities constructed in the area as a continuation of trends established years earlier. The existing building is not eligible for listing in the National or California Registers, or for designation as a City of Los Angeles Historical-Cultural Monument (LA HCM) due to diminished integrity and lack of significance within the relevant context. Additionally, it does not appear to contribute to a potential historic district.

The Project Site is partially located within the boundaries of the Entertainment Planning District identified during SurveyLA; however, Planning Districts are not historical resources as defined by CEQA. As such, the existing building is not a historical resource for the purposes of CEQA. Therefore, the Historic Report concluded that the existing building is not a historical resource; and its demolition would have no impact on historical resources.

The new construction associated with the Project will be physically separated from the previously identified historical resources in the vicinity that are located on adjacent parcels on the north side of Romaine Street. As a result of this physical separation provided by Romaine Street, the Project would also not result in the demolition, destruction, relocation, or alteration of the previously identified historical resources in the vicinity. Vibration generated by adjacent construction activities can reach levels that cause damage, and therefore direct impacts, to certain types of vulnerable buildings and structures; however, most types of standard construction equipment do not generate enough vibration to damage even the most fragile buildings as close as 25 feet away. As such, 1012 N. Seward Street and Hollywood

[37] SurveyLA Field Survey Results Master Report, 9*. 936-962- Seward Street, 949-959 Hudson Avenue Historical Resources Technical Report (Historic Report),* prepared by *GPA* Consulting*,* in November 2023.

Center Studios are a sufficient distance, at least 150 feet or more, from the Project Site that they would be unlikely to be affected by reasonable levels of construction-related vibration.

As such, direct impacts would be less than significant, and no mitigation measures would be required.

Indirect Impacts

The Project would introduce a new visual element in the vicinity of historical resources in the form of a new seven-story building, which has the potential to impair the integrity of setting; however, integrity of setting is not an essential aspect of integrity for 1012 N. Seward Street. That is, the ability to convey its significance does not rely on its relationship to physical features outside the historical resource boundary. Furthermore, the integrity of setting has already been diminished by the immediately abutting multi-story parking garage. Therefore, another instance of new construction in the vicinity of the resource, physically and visually separated by Romaine Street, is unlikely to further impair the integrity of setting to such a degree that it would no longer be eligible for listing.

Districts like Hollywood Center Studios rely on integrity of setting within the district boundaries, particularly the historic relationships between buildings and other character-defining features such as circulation and infrastructure. This integrity of immediate setting helps differentiate districts as a visually and geographically unified entity. While new construction within the boundaries has the potential to affect the integrity and significance of a historic district, new construction outside these boundaries is unlikely to impair the integrity of setting to such a degree that it would no longer be eligible for listing.

As such, the Project would have no indirect impacts on the historical resources in the study area and no mitigation measures would be required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact. As part of the *Archaeological Resources Assessment for the 956 Seward Project*, prepared by Kimley-Horn, a Sacred Lands File (SLF) search request was submitted to the Native American Heritage Commission (NAHC) on September 22, 2023. Results were received on November 17, 2023, noting there are no SLFs on file with the NAHC within or adjacent to the Project area. Kimley-Horn conducted a records search at the South Central Coastal Information Center (SCCIC) on November 1, 2023 to identify any previously recorded archaeological resources or previously conducted cultural resources studies within the Project area plus a 0.5 mile buffer. The results of the records search noted that no previous studies have taken place and no resources have been recorded within the Project area. Further, while thirteen (13) cultural resources studies have been conducted within 0.5 mile of the Project area, no archaeological resources have been recorded.

No archaeological resources were identified within the Project area as a result of the records search and associated research. Additionally, it is unlikely that undisturbed archaeological resources are present within the Project area given the extent of prior development. As such, no archaeological resources that meet the definition of “Historical Resources” or “Unique Archaeological Resources,” as defined by CEQA, were identified within the Project area.

Intact archaeological resources are unlikely to be present within the Project area, therefore, impacts will be less than significant. Any potential resources, while unlikely, that are discovered shall comply with conditions of approval for inadvertent discovery of archaeological resources.

Conditions of approval are included that outline the process for treatment of any archaeological resources and/or human remains inadvertently discovered during Project implementation. With such conditions in place, impacts to archaeological resources would be less than significant.

Condition of Approval

Inadvertent Discovery of Archaeological Resources: In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

With the Project's compliance with the Condition of Approval, impacts to archeological resources would be less than significant.

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

Less than Significant Impact. The Project Site is developed with existing buildings and a surface parking. Although the Project Site has been subject to grading and development in the past, future construction may disturb human remains, including those interred outside of dedicated cemeteries. If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, NAHC must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. With incorporation of this condition of approval, the Project's potential impacts would be less than significant.

Condition of Approval

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

- Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Cumulative Impacts

As discussed above, the Project would have no direct or indirect impacts on historical resources on the Project Site or in the study area. While the Project would introduce a new visual element to the study area, it would not affect the setting of any of the identified historical resources. The Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs.

Any related project sites that contain historical resources would be required to comply with existing regulations and/or safeguard measures as appropriate for that project, including required compliance with CEQA's provisions regarding historical resources. As the Project would not result in a significant impact to historical resources, there is no potential for the Project to contribute to a cumulative impact, and thus, the cumulative impact would be less than significant.

With regard to cultural resources, as it relates to archaeological resources and human remains, the Project would be required to comply with existing regulatory requirements and conditions of approval that would ensure impacts related to archaeological resources and human remains would be less than significant. Furthermore, related Projects would be required to comply with existing regulatory requirements. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to archaeological resources and human remains would be less than significant.

4.6 ENERGY

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Energy calculation worksheets prepared by Kimley-Horn, December 2023, are contained in **Appendix D**.

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

Less Than Significant Impact. The Project is required to comply with California's Energy Efficiency Standards established in Title 24, Part 6, of the California Code of Regulations (CCR). These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated by the California Energy Commission on an approximately three-year cycle to allow consideration and possible incorporation of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the CALGreen Code. The purpose of the CALGreen Code is to improve public health, safety and the general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

The Project would comply with the applicable Energy Efficiency Standards provisions (Part 6) of Title 24 and the CALGreen Code (Part 11). The Project would comply with the current standards at the time of permit approval by the City. Those standards would be no less stringent than the 2022 Building Energy Efficiency Standards, which apply to all building permit applications on or after January 1, 2023.[38]

Construction

Energy use associated with construction of the Project would include diesel fuel consumption by on-road trucks (hauling, material delivery, and vendor trips) and off-road construction equipment and gasoline

[38] https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency, accessed November 2023.

consumption by on-road worker vehicles (construction worker commute trips). Construction of the Project would require the export of building debris from the Project Site during the demolition phase as well as the delivery of building materials during the building phase.

Electricity would be required to power the on-site construction trailer(s), perimeter lighting, etc., but is expected to be minimal compared to available supplies. Due to the portable, temporary nature of the trailers and lighting, they are not subject to the same codes and standards as permanent buildings and infrastructure. Nonetheless, lights and trailers would be used only as needed and be sized appropriately. Construction would not involve the on-site combustion of natural gas. Because electricity would be used only minimally and natural gas not at all, no additional analyses are required to determine that the consumption of electricity and natural gas during construction would not be wasteful, inefficient, or unnecessary.

The estimated total gasoline and diesel fuel anticipated to be used during construction is summarized below **in Table 10**: *Summary of Estimated Energy Use During Project Construction*, and in Appendix D, Energy Consumption Worksheets Project.[39]

Table 10: Summary of Estimated Energy Use During Project Construction

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption[1]	Percentage of Countywide Consumption
Automotive Fuel Consumption[2,3,4]			
Diesel	28,700 gallons	532,570,627 gallons	0.0054%
Gasoline	10,270 gallons	3,536,229,368 gallons	0.0003%
Notes: 1. The Project's estimated increases in automotive fuel consumption are compared with the countywide fuel consumption (projected) in 2025. 2. Countywide fuel consumption data is obtained from the California Air Resources Board EMFAC2021 model. 3. Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2022.1.1.21). 4. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.			
Refer to Appendix D Energy Data for assumptions used in this analysis.			

During this construction phase, the Project would comply with regulatory compliance measures intended to conserve energy. These measures would include restricting haul truck trips to off-peak hours, not allowing engines to idle in excess of 5 minutes when not in use (CARB Air Toxics Control Measure), and using fuel that meets specified fuel and fuel additive requirements and emission standards (CCR Title 13, Sec. 2485). These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

As indicated in **Table 10**, the overall diesel fuel consumption during construction of the Project would be 28,700 gallons and gasoline consumption would be 10,270 gallons, which would constitute nominal amounts (0.0054 percent and 0.0003 percent, respectively) of fuel use in the County. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are

[39] See Energy Consumption Worksheets Included as Appendix D.

no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

Operations

Electricity

Once the Project is operational, it would create electricity demand. Electricity transmission for the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), which serves approximately 4 million people in the City and is the nation's largest municipal electric utility.[40] In order to properly assesses and meet growing energy demands, the LADWP releases Integrated Resource Plans. The latest, the 2022 Final Power Strategic Long-Term Resource Plan, is a comprehensive roadmap intended to assist LADWP to meet the growing energy demand from consumers in an environmentally responsible and cost effective manner and has a 25-year horizon that aligns with state goals for greenhouse gas (GHG) emissions reductions.[41] LADWP reports that it has a net dependable generation capacity of 8,101 megawatts (MW).[42] In Fiscal Year 202-2021, LADWP supplied 20,936 gigawatt-hours (GWh) to more than 1.55 million residential and business customers.[43]

As shown below in **Table 11:** *Summary of Estimated Energy Consumption During Project Operation*, the estimated annual Project-related increase in the consumption of electricity would be approximately 3,303,894 kilowatt-hours (kWh). When compared to the LADWP's 2020-2021 sales of 20,936 GWh, the Project's estimated electricity demand would represent approximately 0.016 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. Further, as discussed above, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code.

The L.A. Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 4 electric vehicle charging stations. Therefore, with regulatory compliance and incorporation of energy conservation features that would reduce the Project's electricity demand from that estimated

[40] Los Angeles Department of Water & Power (LADWP) (2022), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning;jsessionid=qJkclWXGfKYMphk1cByQXnNm3C2PfhpIp5HKZcrNx1v46B6h97xn!224436039?_afrLoop=587252974993333&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D587252974993333%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dk53dcmmex_4, accessed December 2023.

[41] Ibid.

[42] Ibid.

[43] Ibid.

herein, Project operation would not result in the wasteful, inefficient or unnecessary consumption of electricity and no mitigation measures are required.

Table 11: Summary of Estimated Energy Consumption During Project Operation

Energy Type	Annual Quantity[1]	Los Angeles County Annual Energy Consumption[2]	Percentage of Countywide Consumption
Operational Electricity			
Electricity (On-Site)[3]	2,854,944 kWh	-	-
Electricity (Off-Site)[4]	508,658 kWh	-	-
Electricity (Total)[5]	3,303,894 kWh	68,484,956,280 kWh[6]	0.00482%
Automotive Fuel Consumption[8]			
Gasoline (mobile sources)	45,660 gallons	3,446,400,365 gallons	0.00132%
Diesel (mobile sources)	260 gallons	535,038,344 gallons	0.00005%

Notes:
1. Electricity value provided represent most conservative energy consumption estimates. The Project would not include natural gas usage.
2. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model (2026 operational year).
3. Zero Emissions Vehicles, specifically as electric vehicles, will have a non-negligible energy use. That value is included in CalEEMod under the operational electricity use.
4. Off-site electricity use is dominated by water usage and includes the energy associated with the supply, treatment, distribution, and wastewater.
5. The Project increase in electricity consumption is compared to the total consumption in Los Angeles County in 2022.
6. The Project increases in electricity consumption is compared with the total consumption in Los Angeles County in 2026.

kWh = kilowatt-hours

Source: Appendix D Energy Data for assumptions used in this analysis.

Transportation-Related Fuels

Operation of the Project would generate vehicle trips associated with people driving to and from the Project Site. Based on the trip generation estimates and trip lengths found in California Emissions Estimator Model (CalEEMod) outputs (Appendix J), it is estimated that operation of the Project would result in approximately 1,046,864 vehicle miles traveled (VMT) on an annual basis. It is estimated that Project trips would result in the annual consumption of approximately 45,660 gallons of gasoline fuel and 260 gallons of diesel for Project operations.[44] As shown in **Table 11**, above, transportation fuel usage during Project operations would represent approximately 0.00132 percent of gasoline usage and 0.00005 percent of diesel usage within Los Angeles County.

The Project would include conservation measures and design features that would decrease its VMT and therefore its consumption of petroleum-based fuels (gasoline and diesel). Specifically, consistent with the 2020–2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would encourage alternative modes of transit by providing bicycle parking spaces and convenient access to public transit, which would facilitate a reduction in VMT. The Project would provide 4 Electric Vehicle spaces. The Project would provide the bicycle parking pursuant to the LAMC, including 40 bicycle parking spaces. Because of the Project Site's location near transit service, a number of Project-related trips would be expected to be transit or walking/bicycle trips, rather than vehicle trips. Employees would take transit to their destinations or would walk to commercial uses and other services nearby. The expected reduction in Project-related vehicle trips would decrease the Project's consumption of petroleum-based fuels. As such, Project operation would not result in wasteful, inefficient or unnecessary consumption of

[44] See Appendix D for detailed calculations.

petroleum-based fuels, but would promote walking, biking, and other modes of public transportation, and mitigation measures are not required.

Based on the above impact analysis, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Based on the analysis provided below, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the Project's electricity demands would be served by LADWP. Additionally, the Project would comply with the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal and the 2020–2045 RTP/SCS, which contain conservation policies that are mandatory under the City's Building Code; as such, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Such requirements of Title 24, CALGreen and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would incorporate these measures as required by code. The most recent Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

As discussed above, Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. The Project would comply with Title 24, Part 6 per state regulations. In accordance with Title 24, Part 6, the Project would have: (a) sensor-based lighting controls— for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and, (b) efficient process equipment— improved technology offers significant savings.

Title 24, Part 11, contains voluntary and mandatory energy efficiency measures that are applicable to the Project under the California Green Building Standards Code. As discussed above, the Project would result in an increased demand for electricity, and petroleum-based fuels. In accordance with the Project's Title 24, Part 11 mandatory compliance, the Project would (a) divert 50% of its construction and demolition waste from landfills; (b) schedule mandatory inspections of its energy systems to ensure optimal working efficiency; (c) use only low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring and particle boards; and (d) include features ensuring a 20% reduction in indoor water use. In addition, new Project buildings will not consume natural gas. Compliance with all of these mandatory measures would decrease the Project's consumption of electricity and petroleum-based fuels.

The Project would not conflict with any of the federal, state, or local plans for renewable energy and energy efficiency. Because the Project would comply with Parts 6 and 11 of Title 24, no conflict with existing energy standards and regulations would occur.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, petroleum-based fuels during construction and operations would also represent a fraction of the 2026 projected fuel use in Los Angeles County.

Based on the above impact analysis, therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2022 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resource Plan incorporates the estimated electricity requirement for the Project. The power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable. Therefore, impacts would be less than significant, and no mitigation measures are required.

4.7 GEOLOGY AND SOILS

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 geologic feature?	☐	☐	☒	☐

The following analysis of the Project's potential geology and soils impacts is based, in part, on the *Geotechnical Site Evaluation and Stormwater Infiltration Test Report* (Geotechnical Report) prepared for the Project by Gorian & Associates, Inc., dated October 24, 2023 (**Appendix E**). The following discussion regarding Paleontological Resources is based on the technical report prepared for the Project entitled

Paleontological Resources Assessment for the 956 Seward Project prepared by Kimley-Horn, December 2023 (**Appendix C**).

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

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

Less Than Significant. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults are those that have ruptured in the last 130,000 years. Inactive faults are those that have not shown evidence of surface displacement within the last 1.6 million years. In addition, there are buried thrust faults, commonly referred to as blind thrust faults, which are faults that are not exposed at the ground surface. While blind thrust faults do not present a potential surface fault rupture hazard, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones).[45] These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As described in the Geotechnical Report, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a Preliminary Fault Rupture Zone.[46] The closest active mapped faults are the Hollywood Fault, approximately 1.1 miles to the north, Newport Inglewood Fault, approximately 4.5 miles to the southwest, and the Raymond Fault, approximately 8.8 miles to the northeast. The San Fernando Fault is roughly 13 miles to the north. Potential for surface ground rupture due to faulting onsite during the project lifetime is considered remote. [47] The Project would not contain uses or activities, such as mining operations or deep excavation into the earth, that would exacerbate the activity of a known earthquake fault.

[45] The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publication 42, Earthquake Fault Zones.

[46] Gorian & Associates, Inc., Geotechnical Site Evaluation and Stormwater Infiltration Test Report, Proposed 7-story Self-Storage Building, 956 Seward Street, Hollywood, California, 90038, October 24, 2023.

[47] Gorian & Associates, Inc., Geotechnical Site Evaluation and Stormwater Infiltration Test Report, Proposed 7-story Self-Storage Building, 956 Seward Street, Hollywood, California, 90038, October 24, 2023.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to rupture of a known earthquake fault. Impacts are less than significant, and no mitigation measures are required.

ii) Strong seismic ground shaking?

Less than Significant Impact. A significant impact would occur if the Project would exacerbate the risk of personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Strong ground motion occurs as energy is released during an earthquake. The intensity of ground motion is dependent upon the distance to the fault rupture, the earthquake magnitude, and the geologic conditions underlying and surrounding the Project Site.

The Los Angeles Basin, as well as most of Southern California, is located within a complex zone of faults and folds resulting from compressional forces occurring along a bend within the boundary between the Pacific and North American tectonic plates. Numerous generally east-west to northwest trending faults have formed as a result of these north-south compressional forces acting within this area. The closest active mapped faults are the Hollywood Fault, approximately 1.1 miles to the north, Newport Inglewood Fault, approximately 4.5 miles to the southwest, and the Raymond Fault, approximately 8.8 miles to the northeast. The San Fernando Fault is roughly 13 miles to the north. However, as noted above, no active faults delineated by the California Geological Survey have been recognized as crossing or projecting toward the Project Site.

In addition, potential impacts related to seismic ground shaking can be reduced to less than significant through regulatory compliance, and Project structural design. State and local code requirements ensure that buildings are designed and constructed in a manner that, although they may sustain damage during a major earthquake, their risk of collapse is substantially reduced. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates the current seismic design provisions of the 2022 California Building Code, with City amendments, to minimize seismic impacts. The 2022 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific Geotechnical Report that would be subject to review and approval by LADBS. As discussed in the Geotechnical Report, while the Project Site is subject to strong ground shaking in the event of an

earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. The Geotechnical Report provides site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site.

Thus, the Project would be required through regulatory compliance, including the requirements of LAMC Section 91.7006.2, to incorporate the recommendations of the Project's Geotechnical Report and with any conditions issued by LADBS per their review of the Geotechnical Report, which would account for seismic calculations from probabilistic seismic hazard modeling for the Project Site. In addition, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its seismic design considerations as established in the Geotechnical Report that would be reviewed and approved or revised by LADBS as part of the building permit process. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS as part of their required review and approval, which would account for seismic calculations from probabilistic seismic hazard modeling for the Project Site.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic ground shaking. Therefore, impacts would be less than significant, and no mitigation measures would be required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon whereby saturated, granular soils lose their inherent shear strength due to excess pore water pressure build-up, such as that generated during repeated cyclic loading from an earthquake. A low relative density and loose consistency of the granular materials, shallow ground-water table, long duration and high acceleration of seismic shaking are some of the factors favorable to cause liquefaction.

As noted in the Geotechnical Report, the Project Site is not located within an area mapped as potentially affected by earthquake-induced liquefaction or landslides. As discussed in the Geotechnical Report, groundwater was encountered during exploration at a depth of 17 feet below the existing ground surface. Groundwater is estimated at 20 feet below the ground surface based on the Seismic Hazard Zone Report of the Hollywood 7.5 Minute Quadrangle, Los Angeles County, California. [48]

Quaternary-age alluvium underlies the entire Project Site to the maximum depth explored, 51 feet below the existing ground surface. The alluvium generally consists of predominately of yellowish-brown clay in a very dense condition interstratified with a minor layer of silty coarse sand. The Project Site is not within Earthquake Fault, Liquefaction, or Landslide Zones.[49] Furthermore, there are no open slopes or waterways nearby that may present the seismic ground failure of lateral spreading. Therefore, the potential for

[48] Gorian & Associates, Inc., Geotechnical Site Evaluation and Stormwater Infiltration Test Report, Proposed 7-story Self-Storage Building, 956 Seward Street, Hollywood, California, 90038, October 24, 2023.

[49] Gorian & Associates, Inc., Geotechnical Site Evaluation and Stormwater Infiltration Test Report, Proposed 7-story Self-Storage Building, 956 Seward Street, Hollywood, California, 90038, October 24, 2023.

seismic induced ground failure hazards such as liquefaction, seismic settlement, and lateral spreading on-site is considered low.

Additionally, pursuant to LAMC Section 91.7006.2, the Geotechnical Report for the Project addressing the Project Site soils conditions and the final design of the development would be reviewed and approved by LADBS as part of the City's ministerial process for issuing grading and building permits. Review and approval of the Geotechnical Report and design considerations by LADBS would ensure that development of the Project Site would occur in compliance with building safety requirements, including the California Building Code and the LAMC. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant, and no mitigation measures would be required.

iv) Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. As noted in the Geotechnical Report, the Project Site is not located in an area prone to earthquake triggered landslides due to the relatively low relief in the area and preponderance of development covered land. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to landslides. No impact would occur, and no mitigation is required.

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

Less than Significant Impact. Project construction would involve ground-disturbing activities (e.g., excavation, grading, and foundation construction) that would expose soils for a limited time and allow for possible erosion. However, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during Project Site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and Project Site preparation would be required to comply with all applicable provisions of Chapter IX, Article 1, Division 70 of the LAMC, which address grading, excavations, and fills. This LAMC division requires that all grading activities occur in accordance with grading permits issued by LADBS. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1 to April 14), a Wet Weather Erosion Control Plan must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The Wet Weather Erosion Control Plan would include measures such as diversion dikes to channel runoff around the Project Site. Division 70 also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adherence to applicable regulations.

Following the completion of construction, the potential for erosion would be relatively low since the Project Site would be largely impervious and the Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833) and implement standard erosion controls

to limit stormwater runoff, which can contribute to erosion. With compliance with applicable regulations, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant. Therefore, the Project would not directly or indirectly cause potential substantial impacts related to soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As detailed above, the Project would not result in loss, injury, or death related to landslide or liquefaction. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading. The topography of the Project Site is flat, and the Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[50] Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is not identified as being located in an oil field or within an oil drilling area,[51] and there are no active or plugged oil production wells on the Project Site. As previously discussed, compliance with the City Building Code includes incorporation of the Project Site- and Project-specific design requirements for soil stability established in the Geotechnical Report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their review, which would account for slope stability at the Project Site. The Geotechnical Report prepared for the Project concluded that the Project Site can be developed without hazard of landslide and that development would also not result in a similar adverse impact on adjoining properties.[52]

Therefore, the Project Site is not 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 collapse. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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?

Less Than Significant Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. The Geotechnical Report determined that the upper subsurface materials at the Project Site have a moderately expansion potential. The Geotechnical Report included recommendations to reduce potential risks for expansive soil action. The Project would be required to comply with the City of Los Angeles

[50] City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.
[51] Phase I Environmental Site Assessment, 956 Seward Street, Los Angeles, CA, Terracon, July 3, 2023.
[52] Gorian & Associates, Inc., Geotechnical Site Evaluation and Stormwater Infiltration Test Report Proposed 7-Story Self-Storage Building, 956 Seward Street, Hollywood, California. October 24, 2023.

Uniform Building Code, the Los Angeles Municipal Code, and other applicable building codes which include building foundation requirements, such as expansion joints, appropriate to Site-specific conditions, such as expansion potential, established in the Geotechnical Report that would be reviewed and approved by LADBS. If requested by the LADBS additional recommendations can be provided to further reduce the risk of expansive soil movement. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS (pursuant to LAMC Section 91.7006.2). As such, the Project would not risk life or property resulting from expansive soil. Therefore, no impacts would occur, and no mitigation measures would be necessary**.**

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

No Impact. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur, and no mitigation measures would be required.

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

Less than Significant Impact. The following discussion regarding Paleontological Resources is based on Paleontological Resources Assessment prepared by Kimley-Horn, December 2023.

Kimley-Horn staff conducted a review of available geologic maps was conducted for the Project area. United States Geological Survey (USGS) geologic maps show that the Project area is underlain by late Pleistocene-aged alluvium (Qae) made up of clay, sand, and gravel that is slightly elevated and dissected in comparison to adjacent alluvium (Qa) sediments (Dibblee and Ehrenspeck 1991). Geologic units of this age and type have relatively high potential for paleontological resources. In addition to USGS review, a paleontological records search was conducted for the Project area and surrounding region by the Los Angeles County Museum of Natural History (LACMNH) in October 2023. The results of the record search were negative for known specimens within the Project area. However, while there are no fossil localities that lie directly within the Project area, the repository cited positive findings in nearby sediments of the same composition.

No paleontological resources were identified within the Project area. However, the age and composition of soils and sediments across the Project area, combined with the knowledge of paleontological resources identified within similar sediment deposits nearby, indicate a moderate-to-high sensitivity for paleontological resources. As the Project area has been developed in the past, it is likely that any fossil-bearing soils near the surface have been disturbed and that no paleontological resources, if present, have remained intact. However, as some discoveries were found in extremely deep sediments, the likelihood of intact paleontological resources, which would be considered scientifically significant if discovered, being present within deeper sediments remains high. As such, it is possible that paleontological resources could be inadvertently impacted during Project implementation.

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

Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures would be required. With regard to a unique geologic feature, the Project Site is currently developed with one building and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As analyzed under above, the Project's impacts to geology and soils would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, state, and federal regulations and standards for seismic safety. Project impacts to geology and soils would be less than significant. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to geology and soils would be less than significant.

With regard to paleontological resources, the Project would be required to comply with existing regulatory requirements that would ensure impacts related to paleontological resources would be less than significant. Furthermore, related Projects would be required to comply with existing regulatory requirements. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to paleontological resources and would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The analysis is based on the information provided in the *956 Seward Street Project, Greenhouse Gas Impact Assessment,* prepared by Kimley-Horn, January 2024 and in **Appendix F**.

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

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

Less Than Significant Impact.

Background

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. While the global warming potential of CO_2 is lesser than that of methane gas (CH_4) or NO_x emissions, the volume and longevity of CO_2 in the atmosphere makes the emission so influential on the climate. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere as of 2013. However, as the ocean and land take in more CO_2, they become less effective sinks for the molecule.[53]

Regulations and Significance Criteria

Former California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following GHG emission reduction targets: (a) by 2010: Reduce GHG emissions to 2000 levels; (b) by 2020: Reduce GHG emissions to 1990 levels; and (c), by 2050: Reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill (AB) 32 Statutes of 2006, Health and Safety Code Section 38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 million metric tons of CO2 equivalent (MTCO2e). Additionally, Executive Order B-30-15 requires Statewide GHG emissions to be reduced by 40 percent below 1990 levels by 2030.

Executive Order B-30-15 also requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in Executive Order B-30-15. SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided an additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017. The 2022 Scoping Plan is the most recent and comprehensive Scoping Plan. The 2022 Scoping Plan addresses recent legislation targets to reduce anthropogenic emissions to 85 percent below 1990 levels by 2045.[54]

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

[53] Intergovernmental Panel on Climate Change, *Climate Change 2021 - The Physical Science Basis*, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf, accessed September 25, 2023.

[54] California Air Resources Board (CARB), 2022 Scoping Plan for Achieving Carbon Neutrality.https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf, accessed December 19, 2023

Due to the nature of global climate change, no single development project would be expected to have a substantial effect on global climate change. GHG emissions from the proposed Project would combine with emissions emitted across California, the United States, and the world to contribute cumulatively to global climate change. Addressing GHG emission impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency must determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" a project's GHG emissions (14 CRC §15064.4(a)).

Neither the State, SCAQMD, nor the City has adopted any numeric threshold for GHG emissions. The California Natural Resources Agency has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[55] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[56] For the Project, Project consistency with applicable GHG reduction measures/plans is used as the significance threshold.

Therefore, the quantification of the Project's GHG emissions is being done for informational purposes, only, and Project GHG emissions are not evaluated against any numeric threshold; instead, Project GHG emissions are considered consistent with CEQA Guidelines Section 15064.4(b) in the context of whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by AB 32's 2008 Climate Change Scoping Plan and subsequent updates, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City of Los Angeles Sustainable City Plan/Green New Deal.[57]

Finally, the Project's operational GHG emissions inventory is assessed based on the incremental increase in emissions compared to baseline (existing) conditions. Therefore, the calculation of the Project's operational GHG emissions would subtract the existing emissions of the current use to determine the

[55] See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11–13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed May 1, 2017.

[56] Governor's Office of Planning and Research, Technical Advisory—CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008; California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22–26.

[57] See Appendix A2, Greenhouse Gas Assessment for detailed discussion of the regulatory framework with regards to GHG emissions.

incremental increase. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

The Project would create direct and indirect GHG emissions from Project construction and operations. Construction is considered a direct source since these emissions occur at the Project Site. Direct operational-related GHG emissions of the proposed Project would include emissions from area and mobile sources, while indirect emissions would include those related to energy consumption, water demand, and solid waste.

Construction GHG Emissions

Construction of the Project would result in direct emissions of CO_2, N_2O, and CH_4 related to the operation of construction equipment, and the transport of materials and construction workers to and from the Project Site. The SCAQMD advises that construction GHG emissions be summed and amortized over the lifetime of a project (assumed to be 30 years), then the yearly amount be added to the operational emissions.[58] Total GHG emissions generated during all phases of construction were combined and are presented in **Table 12:** *Construction Greenhouse Gas Emissions*. The CalEEMod outputs are contained within Appendix A. As shown in **Table 12**, Project construction would result in a total of 383 $MTCO_2e$ (approximately 13 $MTCO_2e$/year when amortized over 30 years).

Table 12: Construction Greenhouse Gas Emissions

Construction	**$MTCO_2e$**
Construction GHG Emission (2025)	356
Construction GHG Emission (2026)	27
Total Construction GHG Emission	383
30-Year Amortized Construction	13
Source: CalEEMod version 2022.1.1.21. Refer to Appendix F for model data outputs.	

Operational GHG Emissions

Operational or long-term emissions would occur over the life of the proposed Project. GHG emissions would result from direct emission sources such as Project-generated vehicular traffic, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from, the Project Site, the emissions associated with solid waste generated from the Project Site, and any fugitive refrigerants from air conditioning or refrigerators. **Table 13:** *Total Project Greenhouse Gas Emissions*, summarizes the total GHG emissions (amortized construction and operations) associated with proposed Project. As shown, the Project would generate approximately 2,209 $MTCO_2e$/year, not accounting for the existing emissions generated by the existing use to be demolished.

Table 13: Total Project Greenhouse Gas Emissions

Emissions Source	**$MTCO_2e$ per Year**
Construction Amortized over 30 Years	13
Area Source	4
Energy	898
Mobile	368
Waste	50
Water & Wastewater	137

[58] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Refrigerant	740
Total Project Emissions[1]	**2,209**
1. Totals may be slightly off due to rounding.	
Source: CalEEMod version 2022.1.1.21. Refer to Appendix F for model data outputs.	

Greenhouse Gas Reduction Plan Compliance

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to reduce statewide GHG emission levels as follows:

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

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide requires GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. Also, pursuant to AB 32, CARB must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[59]

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[60] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future."[61] The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."[62]

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG

[59] California Air Resources Board. AB 32 Global Warming Solutions Act of 2006. ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed August 15, 2021.
[60] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.
[61] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.
[62] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

emissions of projects where possible, but also indicates that a that a full "life-cycle" analysis is not required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the Project may increase or reduce GHG emissions compared to the existing environment; whether the Project exceeds an applicable significance threshold; and the extent to which the Project complies with regulations or requirements adopted to reduce or mitigate GHGs).

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis.[63] The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[64,65] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[66] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[67]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although State, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the City has determined to assess the significance of the Project's GHG emissions as provided in CEQA Guidelines Section 15064.4(b)(2) by determining whether the Project is consistent with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Therefore, under this analysis, a significant impact would occur if the Project would not comply with applicable regulatory plans and policies to reduce GHG emissions such as those discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

[63] CEQA Guidelines Section 15064.7(b)
[64] CEQA Guidelines Section 15064.4(a).
[65] CEQA Guidelines Section 15064.4(a).
[66] CEQA Guidelines Section 15064.4(a)(1)-(2).
[67] CEQA Guidelines Section 15064.4(b).

Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt and then update a SCS to encourage compact development that reduces passenger vehicle miles traveled and trips so that its region will meet a target, set by CARB, for reducing GHG emissions. The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

Reflecting that purpose, the primary goal of SCAG's 2020–2045 RTP/SCS is to provide a framework for achieving the CARB-assigned per capita reduction targets for GHG emissions from cars and light-duty trucks through land use planning and transportation options, while accounting for anticipated future growth within the region.[68] To accomplish this target, the 2020–2045 RTP/SCS identifies various strategies for reducing per capita VMT. New GHG reduction targets are assigned by CARB, and thus, SCAG's long-range planning document is updated, every four years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[69] Thus, successful implementation of the 2020–2045 RTP/SCS would result in communities with a variety of transportation and housing choices, while reducing automobile use and, thus, GHG emissions from that use.

With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[70] These strategies and policies are addressed below. Also, the Project's consistency with applicable growth forecasts is also assessed because the development of the RTP/SCS involved compilation of local land use and growth trends to form the basis for projections and strategies of the RTP/SCS.[71] Key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns, include: (1) new housing and job growth focused in High Quality Transit Areas (HQTAs); (2) limit total acreage of greenfield or otherwise rural land uses converted to urban use; and (3) reduce VMT per capita.[72]

Consistency with Integrated Growth Forecast. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies of local jurisdictions within SCAG's jurisdiction applicable to the specific area.[73] Growth forecasts prepared by SCAG that are published in the 2020-2045 RTP/SCS indicate that employment within the City will increase from

[68] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[69] Ibid.
[70] Southern California Association of Governments, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.
[71] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS) page 10, adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[72] Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.
[73] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, which represents an increase of 287,600 jobs.[74] A storage facility of this size would typically employ up to two people. Representing 0.001 percent of this increase, the Project's increase of two employees would be within and therefore be consistent with, and not conflict with, local and regional employment projections.

Consistency with VMT Reduction Strategies and Policies. Trip generation and VMT were calculated using the LADOT VMT Calculator, which also accounts for the VMT reductions achieved by proximity to transit.[75] As shown in the Transportation Assessment, the Project would not generate greater than 250 net daily trips and further VMT analysis is not required and a no impacts related to increase in VMT is anticipated pursuant to the City's screening criteria. The Project Site is located in a highly urbanized area that is served by public transit. The Project Site is located approximately 1.2 miles from the Hollywood and Highland metro Station which serves the B Line of the Metro Rail System. Existing transit services within 1,320 feet of the Project Site consists of one bus line, Metro Local 4, operated by Metro. Metro Local 4 provides services between Santa Monica and Downtown Los Angeles via Santa Monica Boulevard. The Project vicinity consists of a pedestrian network of sidewalks providing easy access and connectivity to transit facilities. Streetscape improvements such as additional street trees and landscaping would be provided, which would encourage walkability. Furthermore, the Project would provide ample bicycle spaces and long-term bicycle lockers, promoting the use of alternative modes of transportation. The Project is consistent with and would not conflict with the GHG reduction strategies provided in the 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative. Another goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.[76] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[77] Pursuant to LAMC Section 99.05.106.5.3.6, the number of electric vehicle charging stations (EVCS) shall be 10 percent of the total number of parking spaces provided for all new nonresidential buildings. The Proposed Project would provide a total of 4 electric vehicle parking spaces. As such, the Project would comply with City requirements and the Project would be consistent with, and would not conflict with, this goal.

Energy Efficiency Strategies and Policies. Another important goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[78] That goal is to actively encourage and create incentives for energy efficiency, where possible.[79] As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols

[74] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.
[75] Transportation Assessment, Kimley-Horn, Appendix K.
[76] SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[77] Ibid.
[78] Ibid.
[79] Ibid.

required by the Los Angeles Green Building Code and CALGreen Code.[80,81] These standards would reduce energy usage and, thereby, reduce associated GHG emissions and help minimize any impact on natural resources and infrastructure. Furthermore, the Project would not consume natural gas during operations. In addition, the Project would be subject to the 2022 Title 24 standards, which encourages efficient electric heat pumps, establishes electric-ready requirements, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Land Use Assumptions. At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions from car and light-duty truck travel through better land use planning.[82] In order to assess the Project's consistency with land use assumptions in the 2020–2045 RTP/SCS, the Project's land use characteristics have been analyzed for consistency with the underlying land use assumptions on which SCAG based its SCS. The following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS are based on changing the region's land use and travel patterns:[83]

- New housing and job growth focused in High Quality Transit Areas (HQTAs);
- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

Generally, projects are considered consistent with the provisions and general policies of local and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.[84]

The Project would support, and not conflict with, the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents. The Project would demolish an existing 40,000 sf storage building and its associated parking lot and construct a seven-story storage building of up to 168,478 sf which would increase floor area and therefore job growth, on a previously developed site located in a HQTA that is in close proximity to mass transit options. These Project land use characteristics would focus its job growth in a HQTA, not in a greenfield or rural area, and would minimize the Project's vehicle miles traveled. In addition, the Project would provide bicycle parking spaces that would serve to promote walking and use of bicycles over travel by car or truck. As such, the Project's location and design would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate

[80] City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.
[81] California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.
[82] As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[83] Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.
[84] See, e.g., *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719.

policies.[85] By furthering implementation of SB 375, the Project supports regional land use and transportation-related GHG reductions consistent with State regulatory requirements.

The reduction strategies stated in the 2020–2045 RTP/SCS are "consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level."[86] The strategies identify how the SCAG region can achieve GHG reductions and while SCAG does not have a direct role in the implementation of these strategies, SCAG works to support local jurisdictions by identifying ways to implement the RTP/SCS that fits the vision and needs of each local community.[87] A detailed consistency discussion placed in the context of the strategies as laid out in the RTP/SCS is included in **Table 14:** *Regional Transportation Plan/Sustainable Communities Strategy Consistency*. As shown in **Table 14**, many RTP/SCS strategies are not directly applicable to the proposed Project. Nonetheless, the proposed Project would not conflict with implementation of any of the strategies of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's mobile source GHG reduction targets.

Table 14: Regional Transportation Plan/Sustainable Communities Strategy Consistency

Reduction Strategy	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options	
○ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations. ○ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets. ○ Plan for growth near transit investments and support implementation of first/last mile strategies. ○ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses. ○ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. ○ Encourage design and transportation options that reduce the reliance on a number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations). ○ Identify ways to "right size" parking requirements and promote alternative parking	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these land use policies. The Project Site is located in an urban area within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project Site is also located within close proximity to several transit options. Numerous bus lines also serve the Project Site. The Project would also provide more than the required number of bicycle parking spaces and related amenities and EV parking spaces.

[85] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.
[86] Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 48. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[87] Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 49. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

Reduction Strategy	Project Consistency Analysis
strategies (e.g., shared parking or smart parking).	
Promote Diverse Housing Choices	
○ Preserve and rehabilitate affordable housing and prevent displacement. ○ Identify funding opportunities for new workforce and affordable housing development. ○ Create incentives and reduce regulatory barriers for building accessory dwelling units to increase housing supply. ○ Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**No Conflict.** The proposed Project does not include a residential component and this strategy would not be applicable.
Leverage Technology Innovations	
○ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. ○ Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-model payments. ○ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. The Project would be required to comply with all applicable Title 24 and CALGreen building codes at the time of construction. These building codes would include EV charging stations, designated EV parking, as well as bike parking and storage. The Project would provide more than the required number of bicycle parking spaces and related amenities and four EV parking spaces. Therefore, the Project would utilize technology innovations to reduce reliance on fossil fuels to help the City, County, and State meet its GHG reduction goals. The Project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies	
○ Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions. ○ Support Statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. ○ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. As previously discussed, the Project would comply with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would not install natural gas fire appliances, supporting the phasing out of fossil fuels. Thus, the Project would be consistent with this reduction strategy.

Reduction Strategy	Project Consistency Analysis
○ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies. ○ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region. ○ Continue to support long range planning efforts by local jurisdictions. ○ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	
Promote a Green Region	
○ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards. ○ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration. ○ Integrate local food production into the regional landscape. ○ Promote more resource efficient development focused on conservation, recycling, and reclamation. ○ Preserve, enhance, and restore regional wildlife connectivity. ○ Reduce consumption of resource areas, including agricultural land. ○ Identify ways to improve access to public park space.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. The proposed Project consists of the demolition of a film storage building and its associated parking lot and the construction of a seven-story storage building in an urbanized area. Development of the Project would therefore not interfere with regional wildlife connectivity or consumption of agricultural or greenfield land. The Project would be required to comply with Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. In addition, the Project would be an all-electric development that would not install natural gas appliances and would thereby support the goal of phasing out fossil fuels. The Project would provide more than the required number of bicycle parking spaces and related amenities and EV parking spaces. The Project would include multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. Given the Project Site's location in proximity to a variety of transportation options, its EV parking spaces, and its bicycle parking spaces and related amenities and pedestrian-friendly features, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by encouraging and providing various opportunities for the use of alternative modes of transportation, including public transit, walking and biking. Thus, the Project would support efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.
Source: Southern California Association of Governments, *Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, 2020.	

California Air Resource Board Scoping Plan Consistency

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of **Appendix D**.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitoring and updated as State targets change, and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of **Appendix D**.)

The State also recognizes in *Appendix D, Local Actions*, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing[88] while demonstrating that a Project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the CARB 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[89] A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification. The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

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

[88] The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

[89] Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

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

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers. Installation of additional EV chargers would encourage adoption of EVs.

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

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

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

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

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

The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

Pursuant to SB 375, CARB has set regional targets to work towards achieving GHG emissions reductions from changed land use patterns and improved transportation. The 2035 target for the SCAG region is a 19 percent reduction in per capita vehicle GHG emissions relative to 2005 levels.

The Project would generate 241 net daily vehicle trips and 1,773 net daily VMT. Therefore, the Project is not required to perform a VMT analysis pursuant to the City's screening criteria. A storage facility of this size would employ approximately four employees. Due to the nature of the proposed use, the Project would not generate high traffic volumes on a daily, or consistent basis.

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

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

This reduction strategy mainly applies to City traffic circulation. The proposed Project would provide 40 bicycle parking and four electric vehicle spaces. Therefore, the Project would not conflict with implementation of Complete Streets policies.

- Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
- Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.
- Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)

- Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/ commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

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

The Project Site is within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project would increase floor area on a site located close to jobs and to residential and service uses. The Project Site is also located within close proximity of several transit options. The Project would also provide more than the required number of bicycle parking spaces and would supply EV parking spaces in accordance with City of Los Angeles Ordinance 184692.The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. The Project's focus on locating its growth near destinations and mobility options demonstrates that the Project would contribute to reducing GHG emissions from the transportation sector. The Project would comply with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would be an all-electric development that would not directly consume natural gas, and would thereby support the goal of phasing out fossil fuels.

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

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

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from

RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC and the new building would not include natural gas uses. Therefore, the Project would be consistent and not conflict with the LAMC.

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

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and LADWP has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project includes the construction of a storage facility and would not involve the demolition, retrofit, or construction of residential uses. Therefore, the rebate programs established by the City and Los Angeles Department of Water and Power would not apply to the Project.

Consistency with the City Los Angeles Green LA

The Project would comply with performance-based standards included in the Green Building Code (e.g., current building energy efficiency standards).

For all of the reasons stated above, the Project would be consistent with, and would not conflict with, applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation measure are required.

Cumulative Impacts

Climate change is a global phenomenon. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, Project would be consistent with the applicable GHG reduction plans and policies. Therefore, the Project would result in a less than significant cumulative GHG impact.

4.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following discussion is based on the *Phase I Environmental Site Assessment* (Phase I ESA), prepared by Terracon and dated August 31, 2023 (Revised October 20, 2023) that was conducted to evaluate the presence of known or suspected hazardous materials or waste at the Project Site. In addition, the discussion is based on the *Methane Investigation Report*, prepared by Methane Specialists, dated June 22, 2023. The Phase I ESA and the Methane Investigation Report is included in **Appendix G**.

The Phase I ESA included a review of environmental regulatory databases, aerial photographs, and topographic and fire insurance maps, as well as a reconnaissance survey of existing conditions of the Project Site. The Environmental Assessment was prepared in order to identify existing or potential recognized environmental conditions (RECs) affecting the Project Site that could indicate the potential for

release of hazardous material into the environment. A REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The Environmental Assessment also categorizes RECs as controlled RECs and/or historical RECs. A controlled REC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

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

Less Than Significant Impact.

Construction

Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures would be required.

Operation

Operation of the Project's storage and office leasing uses would involve the use and storage of small quantities of potentially hazardous materials in the form of common hazardous substances typical of those used in commercial and light industrial developments, including lubricants, paints, solvents, custodial products (e.g., cleaning supplies), pesticides and other landscaping supplies.

The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts,

the emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not 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?

Less than Significant Impact. As noted in the Phase I, based on historical records, by 1919, the Project Site was developed for residential uses. By 1950, the dwelling addressed as 956 Seward Street was depicted as a "Day Nursery", and by 1955, the "Day Nursery" was been removed, and a TV and movie, office and storage facility and parking lot were depicted on the northwestern portion of the Project Site. During this time, film cutting rooms were located on the western portion of the Project Site, and film vaults were located on the central portion of the Project Site. By 1957, portions of the film vault area were depicted as film cutting rooms; a portion of the film cutting area on the western portion of the Project Site was depicted as a sheet metal shop; and the dwellings on the northeastern portion of the Project Site were removed. By 1968, the dwellings on the southern portion of the Project Site were removed, and the northeastern portion of the Project Site was depicted as a TV, and movie supply storage area. By 2016, the office, supply and storage buildings were removed from the northern portion of the Project Site and were replaced by a vehicle/trailer storage lot. The Project Site has remained consistent through to the present.[90]

The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (vehicle fuels, paints, oils, and transmission fluids) occur, if asbestos-containing materials (ACMs) and lead-based paint (LBP) that may be encountered in the existing buildings are not properly handled and disposed of, or if contaminated soils and/or groundwater are encountered during excavation and proper erosion controls and disposal methods are not implemented. The Project could also release hazardous materials into the environment during operation if spills or emissions of hazardous materials required for normal operation of commercial land uses (cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, bleach, grease, and petroleum products) occur.

Construction

Spills

During construction, standard construction BMPs for the use and handling of hazardous materials required for construction would be implemented to avoid or reduce the potential for spills and releases pursuant to local, state, and federal regulations such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Adherence to these regulations and immediate response and

[90] Phase I Environmental Site Assessment, 956 Seward Street, Los Angeles, CA, Terracon, August 31, 2023 (Revised October 20, 2023).

reporting of spills would ensure that significant hazards related to the release of hazardous materials into the environment during construction would not occur.

ACMs/LBPs

Based on the age of the existing storage facility, ACMs and LBP may be present in building materials that would be involved in the Project's renovation. However, the Project would be required to comply with existing regulations regarding the removal, transport, and disposal of ACMs and LBP that may be within the existing structure. In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6I, Code of Federal Regulations, Title 29, Section 1926.1101(b), Code of Federal Regulations, Title 40, Part 61, Subpart M, and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1. In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. Adherence to these regulations and procedures would ensure that all ACMs and LBP would be remediated and disposed of in accordance with federal, state, and local regulations. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs or LBP to the public or environment.

Contaminated Soils/Groundwater

The Phase I ESA did not identify any recognized environment conditions (RECs) in connection with groundwater or contaminated soils for the Project Site.

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those similar to any other self-storage urban development. Such hazardous materials typical of storage developments are not considered environmental concerns and their use by the Project would not differ dramatically in type and quantity from existing operations. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. The Project Site is located within a Methane Buffer Zone.[91] The methane zone covers extensive areas of Southern California and is typically related to subsurface methane gas produced from naturally occurring petroleum fields.

A Methane Investigation Report, Prepared by Methane Specialists was prepared to measure sub-surface concentrations of methane at the subject site to determine site-specific methane mitigation requirements prescribed by the City of Los Angeles Department of Building and Safety. Per the Methane Investigation Report, detectable levels of methane were not encountered while testing at the Project Site.[92] While

[91] City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.
[92] Methane Investigation Report-956 Seward Street, Methane Specialists, August 31, 2023 (Revised October 20, 2023)

located in the Methane Buffer Zone, detectable levels were not encountered while testing at the Project Site.

To reduce hazards related to methane intrusion, the Project would be governed by the regulations per the City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance includes requirements for site testing, methane mitigation systems, and ventilation systems. Site Design Levels are categorized as Level I through Level V.

According to the Methane Report, the Project falls under Design Level II, in accordance with the Methane Mitigation Standards Ordinance, the Project does not require a methane mitigation system. Nevertheless, the Project would comply with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment and impacts would be less than significant.

Based on the above, the Project would not encounter contaminated soil and/or ground water during construction and construction and operation would be subject to federal, state, and local regulations regarding the handling, storage, use, transport, and disposal of hazardous materials. As such, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

Less than Significant Impact. There are two schools located within 0.25-mile of the Project Site: Hubert Howe Bancroft Middle School (929 N. Las Palmas Avenue) located 0.24-mile to the west and the Sunshine Shack Preschool (1027 Cole Avenue) located 0.6 miles to the east.

As discussed under a) and b) above, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Thus, with compliance with applicable laws, regulations, and manufacturers' instructions, the potential risks of exposure to hazardous materials for the public or the environment, including schools, due to Project construction would be less than significant. Therefore, impacts associated with the Project's use and storage of minor amounts of hazardous materials within 0.25-mile of schools would be less than significant and no mitigation measures would be required.

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

Less than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Phase I ESA included a search of such environmental records published by local, state, tribal, and federal agencies pursuant to Government Code Section 65962.5. The Project Site was listed on numerous environmental databases, as summarized below.[93]

- Avon Rent a Car/Truck/Van; 1X Legion Productions Inc; Logie E S (956 Seward Street)

  The facility located on the Project Site, was listed in the EDR Exclusive Historical Auto Stations (EDR HIST Auto), Enforcement and Compliance History Information (ECHO), Facility Index System/Facility Registry System (FINDS), Facility and Manifest Data (HAZNET), Hazardous Waste Tracking System (HWTS), and Resource Conservation and Recovery Act Non-Generators/No Longer Regulated (RCRA NonGen/NLR) regulatory databases. The Avon Rent a Car/Truck/Van was identified as a facility with "Universal Waste", and with "Other Hazardous Waste Activities", and having waste streams that consisted of "Unspecified organic liquids" (2018 through 2020). The 1X Legion Productions Inc., listings identified the facility with having waste streams that consisted of "Paint Sludge", and "Empty containers less than 30 gallon" (dated from 1990 through 2000). Logie E S listing identified the facility as an automobile repairing facility in 1924. No further listing was reported for the Logie E S operations.

  A history of violations for the facility were not reported in the databases and the release or chlorinated solvent usage were not reported in the regulatory databases. Based on review of the regulatory databases, short duration of the automotive repairing facility, and the absence of reported violations and chlorinated solvent usage or chemical release listings, the Phase I ESA concluded that Avon Rent a Car/Truck/Van database listing does not represent a REC.

Accordingly, the Project would not create a significant hazard to the public or the environment as a result of its listing on the above databases compiled pursuant to Government Code Section 65962.5. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

No Impact. The Project Site is located approximately 7.5 miles south of the Hollywood-Burbank Airport and is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport. The Project Site is not located within an existing or projected runway protection zone or noise contour associated with any private or public airport. Therefore, no impacts would occur, and no mitigation measures would be required.

[93] Phase I Environmental Site Assessment, 956 Seward Street, Los Angeles, CA, Terracon, August 31, 2023 (Revised October 20, 2023).

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

Less than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. The Project would not create such an impact. The Project Site is located in an established urban area that is well served by an existing roadway network. The Project Site is located along Romaine Street, Seward Street, and N. Hudson Avenue, which are not designated as a Primary or Secondary Disaster Routes; however, Santa Monica Boulevard and Highland Avenue in the vicinity of the Project Site are identified as Primary Disaster Routes.[94] These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. Development of the Project Site may require temporary and intermittent partial street closures along Seward Street and Romaine Street, due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans.

Further, as discussed in Section 4.17, Transportation, as part of the Project, a detailed Construction Management Plan, included as PDF TRAF-1, would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag persons to reroute traffic around any closures to ensure that access would remain unobstructed for land uses in proximity to the Project Site. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

With regards to operation, the Project would not include or cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would be provided from Romain Street. The Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site.

Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by LAFD and LAPD.

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies.

[94] Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf.

Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Impacts related to emergency response plans and emergency evacuation plans are less than significant and no mitigation measures are required.

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

No Impact. The Project Site is not located within or near a state Responsibility Area or a Very High Fire Hazard Severity Zone.[95] [96] In addition, the Project Site is located in a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures would be required.

Cumulative Impacts

Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators.

Some of the related projects include the use of hazardous materials within 0.25-mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25-mile of a school, thereby reducing impacts to less than significant. None of the related projects are within two miles of an airport land use plan, thereby reducing impacts to less than significant.

Some of the related projects may involve temporary construction encroachments into adjacent sidewalks or roadways. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the LAFD and would be developed to meet City standards for emergency access. The related

[95] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.
[96] State of California Office of the State Fire Marshall. Fire Hazard https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/, accessed October 18, 2023

projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the Project.

Related projects are all located in highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
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 impact analysis pertaining to hydrology and water quality includes information on the existing and proposed topography/drainage and infrastructure for the Project Site provided in the *Hydrology & Hydraulics Report*, prepared by Kimley-Horn, January 2, 2024 (Hydrology Report). The Hydrology Report is included in **Appendix H**.

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

Less Than Significant Impact. The Project Site is on developed land, with 95 approximately percent of the Project Site considered impervious. The Project Site is relatively level with slopes ranging from 1-3 percent. The highest elevation of the Project Site is 292 feet above mean sea level (MSL) in the northwest corner of the Project Site and the lowest being 286 feet MSL in the southwest corner. Project Site drainage primarily runs off to Seward Street. City storm drain lines ultimately flow to the south and west, discharging into the first reach of Ballona Creek. Ballona Creek generally flows southwest, ultimately discharging into the Pacific Ocean at the Santa Monica Bay. Ballona Creek is designed to discharge to Santa Monica Bay at approximately 71,400 cubic feet per second from a 50-year frequency storm event.

Surface Water Quality

Construction

Grading and construction activities will temporarily expose the underlying soils and may make the Project Site temporarily more permeable. Also, exposed and temporarily stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of Best Management Practices (BMPs) and erosion control measures to be used during construction to manage runoff flows and prevent pollution. The NPDES and SWPPP measures are designed to (and would in fact) contain and treat, as necessary, stormwater or construction watering on the Project site so runoff does not impact off-site drainage facilities or receiving waters. Construction activities are temporary and flow directions and runoff volumes during construction will be controlled.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would ensure that construction of the Project would not cause the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. As construction activities would be limited to the Project Site, such activities would not conflict with implementation of a water quality control plan. Therefore, construction-related impacts to surface water hydrology would be less than significant.

Operation

Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance (Ordinance 183,833) which requires post-construction stormwater runoff from new projects must be

infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the [8]5th percentile storm event.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The pollutants listed above would be mitigated through the implementation of approved LID BMPs.

As noted in the Hydrology Report, as infiltration is likely infeasible for the Project, the Project would most likely consider implementation of a High Efficiency Biofiltration/Bioretention system. Operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing Project Site is approximately 95 percent impervious. The Project will decrease the overall site imperviousness and a portion of the Project Site will be allocated for stormwater BMPs specifically intended to control and treat stormwater runoff in compliance with LID requirements. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events.

Due to incorporation of the required LID BMPs, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. As such, the Project would not interfere with the implementation of a water quality control plan. Therefore, potential operational impacts would be less than significant.

Groundwater Quality

Construction

Development of the Project would require the export of approximately 5,200 cubic yards of soil. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a

violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. As construction activities are not expected to encounter existing groundwater supplies, it would not conflict with the implementation of a sustainable groundwater management plan. Therefore, impacts on groundwater quality would be less than significant.

Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are known to be currently operated or will be operated by the Project. In addition, while the development of new building facilities would slightly increase the use of on-site hazardous materials as described above, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact.

Construction

Construction activities for the Project would include excavating for building foundations, building up the structure, and hardscape and landscape around the structure. As described in the Geotechnical Site Evaluation, groundwater was encountered approximately 17 feet below grade during substructure investigation. The Project's proposed excavation is not anticipated to go beyond the geotechnical exploration because the Project will not include any subterranean development. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table and impacts related to groundwater would be less than significant.

Operations

The Project will develop landscape, hardscape and one structure that will decrease the overall imperviousness of the Project Site. For conservative analysis, calculations assume 100 percent of the

Project Site will be impervious surfaces to demonstrate there is no net increase in runoff. Implementation of the Project would require incorporation of LID BMPs to treat the "first flush" rain event and as such would be required to utilize infiltration methods. Excess stormwater, which bypasses the BMP systems, would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow.

As discussed above, groundwater is not expected to be encountered during construction. Additionally, there are no known groundwater wells within one mile of the Project Site.

Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures would be required.

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

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

Less than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Project construction activities, particularly including demolition and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff, including into nearby storm drains. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts regarding erosion and siltation would be less than significant, and no mitigation measures are required.

Operations

The Project will develop landscape, hardscape and one structure that will decrease the overall imperviousness of the Project Site. For conservative analysis, calculations assume 100 percent of the

Project Site will be impervious surfaces to demonstrate there is no net increase in runoff. Implementation of the Project would require incorporation of LID BMPs to treat the "first flush" rain event and as such would be required to utilize infiltration methods. Under existing conditions, stormwater runoff primarily sheet flows over the sidewalks and into the gutter. After construction of the Project, stormwater will flow into area drains and roof drains, which will collect and likely discharge through the curb face at concentrated points or into a storm drain pipe connected to the street main. As discussed above, the Project must comply with the City's LID Ordinance requirements to retain, treat and/or filter stormwater runoff to mitigate the impacts of any post-development increases in runoff.

Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to erosion and siltation would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact.

Construction

Three are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing surface parking, building, and associated hardscape. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush").

The Project will develop landscape, hardscape and one structure that will decrease the overall imperviousness of the Project Site. For conservative analysis, calculations assume 100 percent of the Project Site will be impervious surfaces to demonstrate there is no net increase in runoffThe Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The

installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events.

As such, the Project would not increase the rate or amount of surface runoff in a manner which would result in substantial flooding on- or off-site during operation. Therefore, operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact.

Construction

Construction activities for the Project would involve removal of the existing surface parking and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). A portion of the Project Site will be allocated for stormwater BMPs specifically intended to control and treat stormwater runoff in compliance with LID requirements. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events.

As such, the Project would not increase the rate or amount of surface runoff in a manner which would result in substantial flooding on- or off-site during operation. Therefore, operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

iv) Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is not located with a 100-Year or 500-Year flood plain.[97] In addition, no watercourses that may overflow or breech a levee are located on or near the Project Site.[98] Thus, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would impede or redirect flood flows. No impacts would occur, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is not located within a tsunami or seiche zone.[99] Additionally, although the Project Site is located directly south of the Hollywood Reservoir and Mulholland Dam inundation areas, this reservoir and dam, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the dam.

Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Furthermore, typical hazardous materials utilized by storage uses (e.g., cleaning, maintenance, and landscaping supplies) do not represent the type of use that would otherwise degrade water quality and would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. The objective of the EWMP Plan for the Los Angeles River is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

As previously detailed, construction of the Project would prevent the spread of contaminants into groundwater through compliance with all relevant NPDES requirements related to discharges from dewatering operations and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the NPDES Permit, including implementation of an SWPPP for the prevention of

[97] Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 26, 2008, available at: http://msc.fema.gov/portal.
[98] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.
[99] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.

erosion and spread of polluted runoff. These regulations and practices were adopted to, and have been shown to, effectively control the potential stormwater pollution to surface water during construction.

Potential pollutants generated by the Project would be typical of commercial and light industrial land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. As discussed above, the implementation of BMPs as required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. The Project's stormwater treatment system, described above, would reduce stormwater pollutants in accordance with the City's LID requirements. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

Furthermore, the use and disposal of hazardous materials associated with operations of storage uses would be typical in type and quantity of such uses. Compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

Through compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

In accordance with City requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. The City of Los Angeles Department of Public Works reviews projects on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Implementation of LID BMPs would, at a minimum, maintain existing runoff conditions. Therefore, potential cumulative impacts associated with the Project on surface water hydrology would be less than significant.

Future growth in the Ballona Creek Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. The Project Site is located in a highly urbanized area, and it is anticipated that future development projects in this highly urbanized area are not likely to cause substantial changes in regional water quality. As noted above, the Project does not have an adverse impact on water quality and would in fact improve the quality of on-site flows due to the introduction of LID BMPs which do not currently exist at the Project Site. It is likewise anticipated that related projects would also be subject to LID requirements. The Project, combined with related projects, would comply with all applicable laws, rules and regulations, so cumulative impacts to surface water quality would be less than significant.

The Project, in conjunction with forecasted growth in the region, could cumulatively increase groundwater demand. However, as noted above, no water supply wells, spreading grounds, or injection wells are

located within a one-mile radius of the Project Site and the Project would not have an adverse impact on groundwater levels.

Furthermore, as previously discussed, the implementation of the Project would decrease the amount of impervious surface area, such implementation would include the evaluation of and, if feasible, implementation of infiltration LID BMPs. As such, the Project is not anticipated to have a negative impact on groundwater recharge. While any calculation of the extent to which related projects would increase or decrease surface imperviousness that might affect groundwater hydrology would be speculative, the development of such projects would be subject to review and approval pursuant to all applicable regulatory requirements, including any required mitigation of potential groundwater hydrology impacts. In addition, the Project and related projects are located in a highly urbanized area so any potential reduction or increase in groundwater would be minimal in the context of the regional groundwater basin. Therefore, cumulative impacts to groundwater hydrology would be less than significant.

Future growth in the Hollywood Subbasin would be subject to requirements relating to groundwater quality. In addition, since the Project Site is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality. As noted above, the Project does not have an adverse impact on groundwater quality. Also, it is anticipated that, like the Project, other future development projects would comply with all applicable laws, rules, and regulations, therefore cumulative impacts to groundwater quality would be less than significant.

The Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

4.11 LAND USE AND PLANNING

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

a) Physically divide an established community?

Less Than Significant Impact The Project proposes the demolition of the existing approximately 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story, storage building. Development of the Project would remain similar to existing uses, would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. Accordingly, it would not divide an established community. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. Under CEQA, the Project would conflict with an applicable plan if it does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals.[100] As discussed below, the Project would be substantially consistent with, and therefore not conflict with, all applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. These include the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City of Los Angeles General Plan Framework Element (Framework Element) and Health and Wellness Element, Hollywood Community Plan, and City of Los Angeles Municipal Code (Chapter 1—Planning and Zoning). Therefore, impacts related to land use and planning would be less than significant, and no mitigation measures are required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of its local land use plans, redevelopment plans, and zoning ordinance, discussed below. The Project Site is also located within the regional jurisdiction of the Southern California Association of Governments, as discussed below.

[100] State Planning and Zoning law (Government Code Section 65000, et seq.); Office of Planning and Research, State of California General Plan Guidelines; Sequoyah Hills Homeowners Association v. City of Oakland.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

SCAG 2020-2045 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of GHGs through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. SCAG's overarching strategy for achieving its goals is the integration of land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in single occupancy vehicle use and vehicle miles traveled and improvements to the transportation system. The 2020-2045 RTP/SCS, also known as Connect SoCal, includes a strong commitment to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The 2020-2045 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2045. More importantly, the 2020-2045 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and an array of open spaces for future generations.

Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and in "complete streets."[101] As detailed in Table 15, the Project

[101] As defined in SCAG 2020–2045 RTP/SCS, p. 101, complete streets are streets designed and operated to enable safe access for all roadway users of all ages and abilities, including pedestrians, bicyclists, motorists, and transit riders. Complete Streets strategies can include traffic calming, bicycle priority streets (bicycle boulevards) and pedestrian connectivity to increase physical activity, improve connectivity to the regional bikeway/greenway networks, local businesses and parks.

would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents through its location on an urban site in a HQTA in close proximity to mass transit option, thereby minimizing vehicle miles traveled. In addition, the Project would provide bicycle parking spaces that would serve to promote walking and use of bicycles. In addition, the Project would install an additional four EV spaces for a total of 47 parking spaces. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation.

The Project would also be consistent with the goals and policies set forth in Connect SoCal (**Table 15**), as the Project is an infill development that will provide a climate-controlled film storage facility to support media- and entertainment-related uses in Hollywood. The self-storage component would serve residents and professionals in the Hollywood area. The Project would increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Project would increase employment opportunities in an area served by mass transit.

Table 15: Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 4:** Increase person and goods movement and travel choices within the transportation system	**No Conflict.** Although these goals apply at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access, including to the Project Site. The Project Site is within close proximity to several transit options. Transit bus lines run and stop in the greater vicinity of the Project, including Metro Line 4 and Metro Line 210. The Project is 1.2 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System In addition, the Project would provide 40 bicycle parking spaces which is six more spaces provided than the required 34 bicycle spaces. The Project would meet the City Green Building Code Requirements for parking facilities equipped with EV charging stations and those capable of supporting future EVSE. The Project would encourage pedestrian circulation at the street level, through new landscaping and trees. The Project further provides a landscaped pedestrian sitting area along Romaine Street. Given the Project Site's location in proximity to transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation. With respect to safety, the roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area that is already developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature, and the

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	Project's driveways would be designed according to LADOT standards. In addition, the Project would not result in incompatible uses as the proposed storage uses are consistent with land uses in the vicinity of the Project Site. The Project would result in less-than-significant impacts with respect to VMT and conflicts with programs, plans, policies, and ordinances addressing the circulation system. Therefore, the Project would not conflict with these goals.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT; and hazardous geometric design features. Furthermore, during construction of the Project, a Construction Management Plan PDF TRAF-1, would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Therefore, the Project would not adversely affect the security and preservation of the regional transportation system, and the Project would not conflict with this goal**.**
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** The Project would result in less-than-significant impacts related to air quality during construction and operation. Project impacts with respect to GHG emissions would be less than significant. The Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 4 electric vehicle charging stations. These measures are intended to reduce GHG emissions, conserve water and energy, and improve air quality. The Project would be developed on a currently developed Project Site located within an existing urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. Specifically, the Project is an infill development within an existing urbanized area. Transit bus lines run and stop in the greater vicinity of the Project, including Metro Line 4 and Metro Line 210. The Project is 1.2 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System In addition, the Project would provide 40 bicycle parking spaces which is six more spaces provided than the required 34 bicycle spaces. The Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel**.**	**No Conflict**. As discussed above, the Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EVCS. Therefore, the Project would not conflict with this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats**.**	**No Conflict.** The Project proposes the demolition of the existing approximately 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story, storage building. The Project proposes to retain five trees, remove ten trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees). None of the on-site or street trees are considered to be protected by the City of Los Angeles Tree Preservation Ordinance No. 186873. The Project would utilize standard tree protection practices and conform to all relevant tree removal/replacement measures in accordance with City regulations. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.
Source: Kimley-Horn, 2023. SCAG 2020–2045 RTP/SCS	

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Hollywood Community Plan Area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table 16:** *Project Consistency with the Framework Element*. As shown, the Project would be consistent with the applicable objectives and policies.

Table 16: Applicable Goals of the Framework Element

Objective/Policy	Would the Project Conflict?
Distribution of Land Uses	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors	**No Conflict.** The Project will contribute toward and facilitate the City's long-term fiscal and economic viability by providing a climate-controlled film storage facility to support media- and entertainment-related uses in Hollywood. The film storage space would provide opportunities for entertainment and related companies to store film. The self-storage component would serve residents and professionals in the Hollywood area.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**No Conflict.** The Project would construct infill development near public transit options, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project encourages alternative modes of transportation as the Project would provide a total of 17 short-term bicycle parking and 23 long-term bicycle parking stalls, thereby encouraging alternative modes of transportation and fewer vehicle trips. Bicycle parking would be provided near the project entrance along Romaine Street and would be provided along the eastern building façade, facing Hudson Avenue. The bicycle parking would comply with all requirements of the LAMC. The Project is located in a transit-rich area with numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project. The Project would replace the existing building and would be built to Title 24 green building standards, which would ensure better insulation and more energy-efficient heating and cooling.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	**No Conflict.** The Project would promote and provide access for all modes of travel, including pedestrians and cyclists. The Project would provide secure on-site bicycle parking to promote cycling. The installation of new trees, landscaping and enhanced pavement at pedestrian entrances, and walkways would promote the walkability of the adjacent streets and the Project Site. These improvements would emphasize pedestrian/ bicycle access and use.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** The Project would provide film and general storage uses in an urbanized area well-served by transit, and within walking distance of commercial, studio and residential uses. The Project would support the needs of the community and adjacent studio uses.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	**No Conflict.** The proposed landscaping would promote walkability along adjacent streets and would enhance the built environment.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**No Conflict.** The Project would develop storage and film storage uses within a site well-served by transit options and already functioning as storage space.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The Project would construct building is designed with a modern architectural style that features flat roofs, broken-up massing, windows, and a landscaped entrance to enhance the pedestrian-oriented streetscape along Romaine Street. The Project is designed with the current neighboring uses to ensure the Project's compatibility with the surrounding environment. The massing of the building is consistent with the massing of the existing sound stages, recording studios, offices, and parking garages to the north, west, and south of the Project Site**.**

Objective/Policy	Would the Project Conflict?
	In addition, the Project would enhance pedestrian walkability with the installation of landscaping, and street trees along the perimeter of the Project Site. The Project would be constructed to the latest resource-efficient requirements of the LA Green Building Code, thereby improving the quality of life and aesthetic quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No Conflict.** Access to the Project Site would be limited to existing and potential customers, deliver personnel and employees on the Project Site. The Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility, and well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings.
Urban Form and Neighborhood Design Chapter	
Policy 7.2.6: Concentrate office development in regional mixed-use center, around transit stations, and within community centers.	**No Conflict.** The Project Site is situated in a mixed-use urban environment surrounded by residential, industrial, studio, commercial, and service uses. The Project Site is within close proximity to several transit options.
Infrastructure and Public Services Chapter	
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No Conflict.** The Project would be required to obtain coverage under the NPDES Construction General Permit and would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with NPDES Municipal Permit requirements, the Project would implement LID requirements throughout the operational life of the Project to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site in accordance with the City's LID Manual.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** The Project would be within the LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the water supply, storage, and delivery systems would be adequate to support the Project's development.
Source: Kimley-Horn, 2023. City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.	

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Plan includes the following seven goals: (1) Los Angeles, A Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods. As such, the provisions of this plan element address a number of policies not directly tied to the physical environment. However, included within this General Plan element are policies pertaining to the arrangement of land uses within the City and building design procedures.

Because the Project would not conflict with the Plan for a Healthy Los Angeles policies as shown in **Table 17:** *Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element* impacts with respect to consistency with the Plan for a Healthy Los Angeles would be less than significant.

Table 17: Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element

Objective/Policy	Would the Project Conflict?
Policy 2.2 Healthy Building Design and Construction. Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universally accessibility using existing tools, practices, and programs	**No Conflict.** The Project would be near public multiple transportation options, place storage uses near jobs and transit, and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Furthermore, the Project would include pedestrian-friendly landscaping and design, new perimeter streetscape improvements, that would enliven the pedestrian experience. The Project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the Project.
Policy 5.1 Air Pollution and Respiratory Health: Reduce. Air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health	**No Conflict.** The Project would include characteristics and design features that support reductions in air emissions and encouragement of alternative modes of transportation, as discussed more fully in Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, of this MND. The Project would provide new storage uses that support nearby residential and studio uses in a dense urban environment. The Project is surrounded by supportive residential, studio, and commercial uses and is located near transit, reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the Project. In addition, the Project would install electric vehicle supply equipment in four parking spaces, consistent with the City's Green Building Code requirements.
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction. Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases.	**No Conflict.** The Project is consistent with the City's Land Use Plans (in particular the General Plan Framework and the Community Plan), which support a land use distribution pattern that increases employment opportunities near transit center and services, thus supporting the use of alternative transportation that could help reduce GHG emissions from private automobile travel.

Source: Kimley-Horn, 2023
City of Los Angeles Department of City Planning, Health and Wellness Element, adopted 2015, amended 2021.

Hollywood Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The existing Hollywood Community Plan was adopted by the City in 1988. The Hollywood Community Plan Update (HCPU) is currently in process.

Table 18: *Project Consistency with the Hollywood Community Plan* sets forth the 1988 Hollywood Community Plan's goals and policies applicable to the Project and the Hollywood Community Plan Update. On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update and

discusses the Project's consistency with each of them. As shown, the Project would be consistent with the applicable objectives and policies of the Hollywood Community Plan.

Table 18: Project Consistency with the 1988 Hollywood Community Plan and Hollywood Community Plan Update

Objective/Policy	Would the Project Conflict?
1988 Hollywood Community Plan	
Objective 1: To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**No Conflict**. The Project would include a general storage film storage facility would provide a needed service to professionals in the film industry who live and work in the Hollywood area and would encourage revitalization of the motion picture industry. The film storage space would provide opportunities for entertainment and related companies to store film. The self-storage component would serve residents and professionals in the Hollywood area.
Objective 4: To promote economic well-being and public convenience through: a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating land for industrial development that can be so used without determent to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose. c. Encouraging the revitalization of the motion picture industry. d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**No Conflict.** While this is a citywide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area that is well-served by public transit. The Project would include various streetscape improvements such as additional on-site and street trees and landscaping to encourage walkability. Furthermore, the Project would provide approximately short- and long-term bicycle parking spaces, per LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.
Hollywood Community Plan Update	
LU6.2: Maintain walkability. Apply pedestrian oriented design to new projects to encourage pedestrian first design guidelines to maintain walkable commercial neighborhoods.	**No Conflict.** The Project would involve infill development near public transit options, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project encourages alternative modes of transportation as the Project would provide a total of 17 short-term bicycle parking and 23 long-term bicycle parking stalls, thereby encouraging alternative modes of transportation and fewer vehicle trips. Bicycle parking would be provided near the project entrance along Romaine Street and would be provided along the eastern building façade, facing Hudson Avenue. The bicycle parking would comply with all requirements of the LAMC. The Project is located in a transit-rich area with numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project. The Project would replace the existing building and would be built to Title 24

Objective/Policy	Would the Project Conflict?
1988 Hollywood Community Plan	
	green building standards, which would ensure better insulation and more energy-efficient heating and cooling. No Conflict. The Project would promote and provide access for all modes of travel, including pedestrians and cyclists. The Project would provide secure on-site bicycle parking to promote cycling. The installation of new trees, landscaping and enhanced pavement at pedestrian entrances, and walkways would promote the walkability of the adjacent streets and the Project Site. These improvements would emphasize pedestrian/ bicycle access and use.
LU6.3 Pedestrian Amenities. Provide pedestrian amenities that make walking convenient, safe and practical, like benches, pedestrian paths, lighting and street trees to activity centers. Encourage projects to incorporate such features.	**No Conflict**. The Project would provide access for all modes of travel, including pedestrians. The Project would encourage pedestrian circulation at the street level, in part through the orientation of the proposed new building, through enhanced landscaping and new trees, and through the Project's design features aimed at providing a pedestrian-oriented streetscape, particularly along Romaine Street. The Project's entrance along Romaine Street promotes pedestrian activity by placing the entrance at grade-level with unobstructed views of the public right-of-way.
Goal LU10: Industrial, media-related, and entertainment-related uses that promote jobs in Hollywood.	**No Conflict**. The Project would include a general storage film storage facility would provide a needed service to professionals in the film industry who live and work in the Hollywood area and would encourage revitalization of the motion picture industry. The film storage space would provide opportunities for entertainment and related companies to store film.
Source: Kimley-Horn, 2023 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988. City of Los Angeles Department of City Planning, Hollywood Community Plan Update, May 3, 2023	

Los Angeles Municipal Code

Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC). The Project is requesting the following discretionary entitlements, reviews, permits, and approvals:

1. Zone Change and Height District Change pursuant to Los Angeles Municipal Code ("LAMC") Section 12.32-F to change the zoning of all parcels from MR1-1 and R3-1 to (Q)M1-2D.
2. Conditional Use Permit pursuant to LAMC Section 12.24-W.50 for a storage building for household goods in the M1 zone within 500 feet from an A or R Zone or residential use.
3. Site Plan Review pursuant to LAMC Section 16.05 to permit the development of a project that creates or results in an increase of 50,000 gross square feet ("sf") or more of nonresidential floor area.
4. Waiver of Dedication and/or Improvements pursuant to LAMC Section 12.37-I.3 to waive the following dedications and improvements:
    a) Seward Street: Waive 7-foot dedication and street widening requirement.
    b) Romaine Street: Waive 5 feet of the required 7-foot dedication and street widening requirement. The Project proposes to dedicate 2 feet along Romaine Street for sidewalk widening.

c) Hudson Avenue: Waive 2-foot dedication and street widening requirement. The following paragraphs discuss the Project's compliance with the building standards of the LAMC.

Zoning and Land Use

Under the existing 1988 Hollywood Community Plan and the LAMC, the land use designation for the entire Project Site is Limited Manufacturing. The Project Site is currently split zoned with the western five parcels fronting onto Seward Street zoned MR1-1, and the eastern three parcels fronting on Hudson Avenue are zoned R3-1. The Project Site's MR1-1 zoning is consistent with the Limited Manufacturing land use designation; however, the Project Site's R3-1 zoning is not consistent. The MR1-1 zone permits a variety of commercial uses, limited manufacturing uses, wholesale, laboratory, bank, and other uses. The R3-1 zone permits single-family dwellings, two-family dwellings, multiple dwellings, and related uses.

As part of the Project approval, the Project would be rezoned from MR1-1 and R3-1 to a uniform (Q)M1-2D. The proposed M1 zone is consistent with the Project Site's current land use designation of Limited Manufacturing and would be consistent with the Project Site's updated Limited Industrial land use designation per the HCPU.

The Project Site's current Height District No. 1 designation within the MR1 zone does not impose any height limitations but limits FAR to 1.5:1. The Project's floor area would total approximately up to 168,478 sf. The Project Site area totals approximately 56,254 sf. Therefore, the Project's proposed FAR of 2.99 would exceed the maximum FAR currently permitted. The proposed Height District No. 2 designation within the M1 zone would not impose any height limitations but would limit FAR to 6:1. However, the requested Zone Change would volunteer a new "D" limitation, consistent with the "D" limitation proposed by the HCPU, which would change the Project Site's base FAR to 1.5:1 but with an allowable increase of up to 3:1 FAR for developments that provide 0.7:1 of total project FAR to media-related industrial uses. Thus, the Project's 2.99:1 FAR would be within the maximum FAR imposed by the proposed (Q)M1-2D zoning. Accordingly, the Project would include a Zone Change and Height District Change from MR1-1 and R3-1 to (Q)M1-2D.

The proposed zone and height district changes would allow the Project Site to be redeveloped with a viable, and desirable use consistent with surrounding land uses and the current HCPU. With approval of the Zone Change and Height District Change requested under LAMC Section 12.32-F to change the zoning of all parcels from MR1-1 and R3-1 to (Q)M1-2D, the Project's would be consistent with the applicable zoning regulations.

Waiver of Dedication and/or Improvements

The Project requests to reduce the Romaine Street dedication from 7 feet to 2 feet (a waiver of 5 feet of required dedication/widening) and reduce the street widening requirement from 5 feet to 0 feet. Instead, The Project would dedicate 2 feet to widen the sidewalk. The Project also requests waivers of the 7-foot dedication/widening requirement along Seward Street and 2-foot dedication/widening alone Hudson Avenue.

As discussed in Section 4.17, Transportation, the Project's transportation impacts would be less than significant, and the requested dedications and improvements would not impact traffic flow or safety. With

approval of the requested waiver of dedications/improvements, the Project would be consistent with the zoning regulations governing the Project Site.

Cumulative Impacts

The Project would be substantially consistent with applicable land use plans, policies and regulations and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the propose of avoiding or mitigating an environmental effect. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

4.12 MINERAL RESOURCES

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

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

No Impact. As noted in the Phase I ESA, no oil wells were identified on or near the Project Site.[102] Additionally, the Project Site is not located within an oil field or oil drilling area,[103] or within a surface mining district or MRZ-2 zone.[104] The Project Site is currently designated for Limited Manufacturing land uses and not for mineral extraction land uses. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Accordingly, the Project would not result in the loss of availability of a known mineral resource of statewide or regional importance. Therefore, no impact would occur, and no mitigation measures would be required.

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

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.[105] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally important mineral resources. Therefore, there would be no impact to locally important mineral resources, and no mitigation measures would be required.

Cumulative Impacts

The Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey such that the Project would not result in the loss of a

[102] Phase I Environmental Site Assessment, 956 Seward Street, Los Angeles, CA, Terracon, August 31, 2023 (Revised October 20, 2023).
[103] City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.
[104] City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.
[105] City of Los Angeles General Plan, Conservation Element, 2001. Appendix A. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed October 3, 2023.

locally important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project Site vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

4.13 NOISE

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

The analysis below is based on the *Acoustical Assessment, 956 Seward Street Project*, prepared by Kimley-Horn, December 2023 and included as **Appendix I**.

Background

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. The fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this ambient noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micro-pascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold

increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA.[106] Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:[107]

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes

[106] Compiled from James P. Cowan, Handbook of Environmental Acoustics, 1994 and Cyril M. Harris, Handbook of Noise Control, 1979.
[107] Compiled from California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, and FHWA, Noise Fundamentals, 2017.

for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.[108]

Ground-Borne Vibration

Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment use during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is vibration decibels (VdB) (the vibration velocity level in decibel scale). Other methods are the peak particle velocity (PPV) and the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 19: *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations***,** displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground-borne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

[108] Federal Interagency Committee on Noise, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992.

Table 19: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Caltrans Vibration Annoyance Potential Criteria	Caltrans Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.08	Readily Perceptible		
0.01	--	--	--
0.04	--	--	--
0.1	Begins to Annoy	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	Annoying	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry
0.4	Unpleasant	--	--
0.5	--	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)

PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit administration, Transit Noise and Vibration Assessment Manual, 2018.

Regulatory Setting

Federal

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development.[109] The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential damage from construction. The guidance document establishes criteria for evaluating the potential for damage for various structural categories from vibration.

State of California

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services.[110] The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and

[109] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

[110] State of California Governor's Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed December 2022.

"conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Local

City of Los Angeles Municipal Code

The City has adopted regulations to control unnecessary, excessive, and annoying noise, as set forth in the City's Noise Ordinance (Chapter XI, Noise Regulation, of the Los Angeles Municipal Code [LAMC]). The City's Noise Ordinance establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

Section 111.02 (Sound Level Measurement Procedure and Criteria) of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. According to the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. Section 112.01 (Radios, Television Sets, and Similar Devices) of the LAMC prohibits the production of noise from any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area, or that exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA.

Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment) limits increases in ambient noise levels created by air conditioning, refrigeration, heating, pumping, and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of 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.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is

required only where "technically feasible."[111] Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.).

City of Los Angeles General Plan

The Noise Element of the Los Angeles City General Plan (Noise Element) provides guidance for the control of noise to protect residents, workers, and visitors from potentially adverse noise impacts. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element defers regulation of temporary, point-source noises such as construction activities to the City's Municipal Code Noise Ordinance. With regard to long-term noise impacts, the Noise Element contains stated goals, objectives, policies, and implementation programs for noise control.

Goal: A city where noise does not reduce the quality of urban life.

Objective 2: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Implementation P5: Continue to enforce, as applicable, city, state and federal regulations intended to abate or eliminate disturbances of the peace and other intrusive noise.

Implementation P11: For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.

Implementation P16: Use, as appropriate, the "Guidelines for Noise Compatible Land Use" (Exhibit I),1 or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter, within a CNEL of 65 dB airport noise exposure areas and within a line-of-sight of freeways, major highways, railroads or truck haul routes.

[111] In accordance with Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

Existing Noise Sources

The Project Site is impacted by various noise sources. Mobile sources of noise, including traffic along Seward Street, Romaine Street, and North Hudson Avenue are the most common and prominent sources of noise in the Project Site area. Other noticeable sources of noise on and near the Project Site include parking lot noise and mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units) operating at the Project Site and existing nearby commercial and residential uses, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.).

Noise Measurements

To quantify existing ambient noise levels in the Project Site area, Kimley-Horn conducted four short-term (15-minute) measurements on June 6, 2023.[112] The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses immediately adjacent to the Project Site. The 15-minute daytime measurements were taken between 9:08 A.M. and 10:20 A.M. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels measured at each location are listed in **Table 20***: Existing Noise Measurement Locations and Measurements* and shown on **Figure 21:** *Noise Measurement Locations.*

Table 20: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L_{eq} (dBA) [1]
ST-1	Corner of Seward Street and Barton Street	9:08 A.M.	15 min	58.6
ST-2	Hudson Avenue near Romaine Street	9:28 A.M.	15 min	53.6
ST-3	North of Romaine Street on Hudson	9:51 A.M.	15 min	55.0
ST-4	Romaine Street, west of Hudson	10:08 A.M.	15 min	58.0
Source: Noise measurements taken by Kimley-Horn and Associates, Inc., June 6, 2023. See Appendix I for noise measurement results.				

[112] The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes; see Section 111.01 of the LAMC.

SOURCE:Nearmap, 2023

N.T.S.

Figure 8: Noise Measurement Locations

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses. Sensitive receptors near the Project Site are shown in **Table 21:** *Sensitive Receptors* along with the Noise Measurement Location that represents each sensitive receptor.

Table 21: Sensitive Receptors

	Receptor Description	Distance[1] and Direction from the Project
SR-1	Single Family Residential, 6506 Barton Avenue and 913 Seward Street *(represented by noise measurement ST-1)*	205 feet to the southwest
SR-2	Multifamily Residential, 945 N Hudson Avenue (*represented by noise measurement* ST-2)	Adjacent to the south
SR-3	Single Family Residential, 1006 N. Hudson Avenue *(represented by noise measurement ST-3)*	210 feet north
SR-4	Multifamily Residential, 6511 Romaine Street *(represented by noise measurement ST-4)*	205 feet northeast
	Source: Google Earth, 2023. 1. Distance measured from the property line of the Project Site to the nearest receptor property line.	

Applicable Thresholds

Construction Noise

On-Site Construction. Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[113] In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[114]

Off-Site Construction. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Operational Noise

On-Site Operations. With respect to on-site operational noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the City of Los Angeles CEQA Thresholds Guide (Noise Regulations).[115]

[113] Los Angeles Municipal Code, Section 41.40, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777#JD_41.40

[114] In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

[115] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

Off-Site Operations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project's off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the noise levels fall within the "normally unacceptable" or "clearly unacceptable" category, as specified in the City's Noise Element, or an increase of 5 dBA in CNEL if the noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses.

Composite Operational Noise. In addition, the City has determined to assess the significance of the Project's composite noise levels (on-site and off-site sources) based on whether the Project's composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall) at noise-sensitive uses.

Vibration

Increases in groundborne vibration levels attribute to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Construction activities would occur at least 8 feet from adjacent residential buildings.[116]

Structural Damage Structural Damage Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[117] With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.[118] Two historic buildings are located within the Project vicinity: Hollywood Vaults, Inc., located approximately 1,200 feet to the south of the Project Site and Hollywood Center Studio (also known as Sunset Las Palmas Studios), located approximately 300 feet northwest of the Project Site. This evaluation uses the FTA architectural damage criterion for continuous vibrations of 0.12 in/sec for this historic building (buildings extremely susceptible to vibration damage) and 0.2 in/sec peak particle velocity (PPV) at non-engineered timber and masonry buildings for all other adjacent structures.

Human Annoyance. In accordance with FTA guidance for human annoyance, a threshold of 0.04 in/sec PPV is utilized in this analysis.[119]

[116] Potential impacts related to structural damage could occur as vibratory construction equipment is operated near neighboring structures. An averaging of vibration velocities taking into consideration the movement of equipment throughout the construction area is not appropriate. Therefore, construction vibration levels are measured from the nearest distance equipment would operate from a receptor whereas construction noise is measured from the center of the Project Site.

[117] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

[118] Ibid.

[119] Ibid.

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

Less than Significant

Construction

On-Site Construction Noise

Construction noise levels were based on typical noise levels generated by construction equipment published by the FTA and FHWA. Construction noise is assessed in dBA L_{eq}. This unit is appropriate because L_{eq} can be used to describe noise level from operation of each piece of equipment separately, and levels can be combined to represent the noise level from all equipment operating during a given period.

Reference noise levels are used to estimate operational noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance (line-of-sight method of sound attenuation for point sources of noise). Noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual temporary construction noise.

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels. During construction, exterior noise levels could affect noise-sensitive uses near the construction site. Construction activities would include demolition, grading, excavation, paving, building construction, and architectural coating. Noise levels associated with individual construction equipment to be used during Project construction and renovation are listed in **Table 22**: *Project Construction Equipment Noise Levels*.[120]

It should be noted that the values shown in **Table 22** are for the equipment when operating at full power. Construction noise was calculated accounting for each piece of equipment's usage factor, or fraction of time that the equipment would be in use at full power over a specific period of time.[121] Other primary sources of acoustical disturbance may include random incidents, which would last less than one minute (such as dropping of materials or the hydraulic movement of machinery lifts). It should also be noted that due to the constraints of the Project Site and standard construction practices, only a limited amount of equipment can operate on the Project Site at a particular time. Following the FTA's methodology for quantitative construction noise assessments, construction noise was predicted at the nearest noise-sensitive receptors consistent with the Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) and the methodologies in the FTA *Transit Noise and Vibration Impact Assessment Manual*.[122] Following FTA methodology, when calculating construction noise, all equipment is assumed to operate at the center of the Project Site, as equipment would operate throughout the Project Site and not

[120] *Federal Highway Association, Roadway Construction Noise Model, User Guide 2005*.
[121] Ibid.
[122] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

at a fixed location for extended periods of time.[123] Therefore, the distance used in the RCNM model was measured from the center of the Project construction area.

Table 22: Project Construction Equipment Noise Levels

Construction Phase	Equipment	Typical Noise Level (dBA L_{max}) at 50 feet from Source	Usage Factor (%)
Soft Demolition	Front End Loader	79	40
	Backhoe	78	40
Hard Demolition	Excavator	81	40
	Backhoe	78	40
Grading	Excavator	81	40
	Backhoe	78	40
Excavation	Front End Loader	79	40
Paving	Paver	77	50
	Roller	80	20
	Concrete Mixer Truck	79	40
Building Construction – Footings/Foundations	Backhoe	78	40
	Concrete Mixer	61	40
	Vibratory Concrete Mixer	80	20
Building Construction – Building Erection	Crane	81	16
	Backhoe	78	40
	Man Lift	61	20
	Welder/Torch	74	40
	Forklift	61	40
Building Construction – Finishes	Compressor (air)	78	40
	Flat Bed Truck	74	40
	Man Lift	75	20
	Forklift	61	40
	Welder/Torch	74	40
Architectural Coating	Compressor	78	40
	Man Lift	75	20

Source: Federal Highway Association, Roadway Construction Noise Model, User Guide 2005; Source for Forklift Noise level: Warehouse & Forklift Workplace Noise Levels, The Main Noise Exposed SEG – Forklift Drivers, https://www.noisetesting.info/blog/warehouse-forklift-workplace-noise-levels/, Accessed July 2023.

* *Noise levels were predicted for multiple building construction scenarios due to days where differing equipment mixes would occur (e.g., instances where certain types of equipment such as cranes and concrete pumps would not be operated at the same time).*

Table 23: *Project Construction Noise Levels,* shows the estimated maximum exterior construction noise levels at the nearest receptors to the Project Site.[124] See **Appendix I** for predicted construction noise for each individual construction phase.

[123] Ibid.

[124] For predicted construction noise levels for all construction phases, see **Appendix I**.

Table 23: Project Construction Noise Levels

Receptor #	Receptor	Maximum Noise Level at Receptor Property Line (L_{eq})[1, 2]	Noise Threshold at 50 feet (dBA L_{eq}) [2]	Exceeded?
SR-1	Single Family Residential, 6506 Barton Avenue and 913 Seward Street *(represented by noise measurement ST-1)*	60.5	75	No
SR-2	Multifamily Residential, 945 N Hudson Avenue (*represented by noise measurement* ST-2)	74.9		No
SR-3	Single Family Residential, 1006 N. Hudson Avenue *(represented by noise measurement ST-3)*	62.1		No
SR-4	Multifamily Residential, 6511 Romaine Street *(represented by noise measurement ST-4)*	61.4		No

Per the methodology described in the FTA Noise and Vibration Manual (September 2018), distance is measured from the property line of the receptor to the center of the Project construction site.

1. Section 112.05 of the LAMC sets a maximum noise level for each piece of construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. This analysis conservatively assumes that multiple pieces of equipment identified in Table 6 would operate simultaneously. Therefore, the noise levels from the center of the Project Site to the property lines of the nearest sensitive receptors have been calculated. Per the methodology described in the FTA Noise and Vibration Manual (September 2018), distance is measured from the property line of the receptor to the center of the Project construction site.

2. Section 112.05 of the LAMC sets a maximum noise level for each piece of construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. This analysis conservatively assumes that multiple pieces of equipment identified in Table 24 would operate simultaneously. Therefore, the noise levels from the center of the Project Site to the property lines of the nearest sensitive receptors have been calculated.

Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to Appendix H for noise modeling results for each construction phase.

As shown in **Table 23,** Project construction noise would not exceed the LAMC Section 112.05 significance criterion of 75 dBA L_{eq}. In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Construction activities would also be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday and 6:00 p.m. to 8:00 a.m. on Saturdays, and at any time on Sunday. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. In addition, Project construction noise would be reduced and minimized through specified project design features. Project construction would ensure the proper maintenance of construction equipment and the use of noise shielding devices such as noise blankets on all power construction equipment to minimize construction equipment (NOI-PDF-1), Project construction would not utilize pile driving systems (NOI-PDF-2), concrete trucks would be located on Romaine Street away from noise-sensitive receptors south of the Project Site(NOI-PDF-3), and all loading and unloading areas during construction will be shielded from off-site noise-sensitive receptors to block line-of-sight to the extent feasible (NOI-PDF-4). For all of these reasons, the Project would not result in the generation of a substantial temporary 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 during construction. Therefore, impacts would be less than significant, and no mitigation measures are required.

Project Design Features:

The following project design features are proposed with regard to noise and vibration:

PDF NOI-PDF-1: Noise from power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding devices such as noise blankets on construction equipment to reduce engine noise or muffling devices to reduce exhaust noise. All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

PDF NOI-PDF-2: Project construction will not include the use of driven (impact) pile systems.

PDF NOI-PDF-3: Concrete trucks will be located on Romaine Street, away from sensitive uses south of the Project Site.

PDF NOI-PDF-4: All construction loading areas will be acoustically screened from off-site noise-sensitive receptors with temporary construction fencing equipped with sound blankets.

PDF NOI-PDF-5: All construction haul, dump, and water trucks would be operated within the northern portion of the Project Site, at least 50 feet from any sensitive receptors, along Romaine Street, which would allow for efficient access to the highway.

PDF NOI-PDF-6: The Project will designate a Construction Relations officer to serve as a liaison with residential communities, who will be responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) will be prominently displayed at the Project Site. Signs will be posted at the Project Site that include permitted construction days and hours.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Haul trucks would travel to and from the Project Site using Romaine Street Hudson Avenue. Construction trucks and construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus, would not overlap with the Project's construction equipment. In addition, construction workers would come from various directions to the Project Site. According to modeling assumptions included in the air quality assessment prepared by Kimley-Horn in December 2023, there would be up to 30 daily vendor truck trips accessing the Project Site during the building construction phase and 77 employee trips. The estimated noise level due to building construction trips plus existing traffic along Seward Street, Romaine Street, Hudson Avenue, and Willoughby Avenue, assuming that all construction trips would occur along all roadway segments, is shown in **Table 24:** *Existing and Existing Plus Project Construction Traffic Noise Levels*. As shown, these increases in traffic noise would be below the 5-dBA significance criterion. The Project would not result in the generation of a substantial temporary 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 during construction. Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 24: Existing and Existing Plus Project Construction Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project Construction		Incremental Increase	Significant Impact?
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]		
Seward Street between Romaine and Willoughby	1,354	49.6	1,461	52.8	3.2	**No**
Romaine Street between Seward and Hudson	1,456	50.0	1,563	52.9	2.9	**No**
Hudson Avenue between Romaine and Willoughby	969	48.2	1,076	52.1	3.9	**No**
Willoughby Avenue between Seward and Hudson	5,312	55.6	5,419	55.6	0.0	**No**

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level
1. Traffic noise levels are at 100 feet from the roadway centerline.
Source: Based on existing traffic data provided by Kimley-Horn and Associates, Inc., October 2023 and construction data provided by Kimley-Horn and Associates, Inc., December 2023.

Operations

On the western side of the Project Site along Seward Street, the Project proposes to construct and operate seven stories of storage use. The Project proposes 47 automobile parking spaces provided onsite in a surface-level parking lot and 40 bicycle parking spaces provided onsite at ground-level. The Project would provide vehicular access along Romaine Street and Hudson Avenue. Romaine Street would contain one driveway permitting the entry and exit of vehicles. Hudson Avenue would contain one driveway permitting only the exit of vehicles.

<u>On-Site Parking and Customer Loading</u>

The proposed Project would provide 47 automobile parking spaces and 40 bicycle parking spaces on site within the surface parking lot. The proposed Project's loading area includes four loading docks and would be located on the east side of the self-storage facility and is meant to provide customers with a location adjacent to the building to load and unload their items when needed. The loading area is located to the northwest of the residential receptors to the south and would be shielded by an eight-foot concrete masonry unit (CMU) block wall and 24-inch box screen trees. The proposed self-storage facility will consist of approximately 1,400 storage units with an average size of approximately 80-85 square feet per unit. Per ExtraSpace's sizing guide, a 5x10 unit (or 50 square feet) could store the contents of a one-bedroom apartment, and a 10x10 unit (or 100 square feet) could store the contents of a larger living space or a two-bedroom apartment. Most vehicular requirements for tenants at the proposed facility would use a personal van/pickup truck.[125] Less frequently, a small 10 to 15 foot U-Haul truck (non-diesel) could be used by tenants. Larger trucks or diesel-powered vehicles will not be necessary or common, and larger cross-country moving trucks will not be able to access parking lot due to limited space. Additionally, approximately 40,000 square feet of the facility (approximately 25%) will be dedicated to film storage. The average size for film storage units is smaller than the facility average of 80 to 85 square feet, with the majority of units being 5x5 or 5x10 unit sizes. Storage and transportation of film are typically handled by small, specialized vans with minimal heat or particulate exposure as they often require additional care. Film stored at the proposed facility is not anticipated to move frequently once in storage. Therefore, loading area noise would be limited. Noise levels generated by Project parking, vehicle access, loading and unloading would not result in the generation of a substantial permanent increase in ambient noise levels

[125] Operational assumptions are based on empirical observations at an existing storage facility with similar unit sizing and storage purpose.

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. Therefore, impacts would be less than significant, and no mitigation measures are required.

On-Site Mechanical Equipment Noise

It is assumed that the proposed storage building would be climate controlled. Therefore, the Project would include rooftop mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[126] Pursuant to LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), the operation of any air conditioning, refrigeration, or heating equipment shall not create any noise which would cause the noise level of another occupied property to exceed the ambient noise level by more than 5 dBA. Assuming conservatively, that mechanical equipment would be located within a portion of the rooftop nearest to each receptor, rooftop mechanical equipment would be positioned at least 50 feet away from multi-family residences located to the south of the Project Site. As shown in **Table 25:** *Mechanical Noise Levels*, mechanical equipment noise levels would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). Project mechanical equipment would not result in the generation of a substantial 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. Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 25: Mechanical Noise Levels

Receptor #	Receptor	Distance to Receptor (feet)[1]	Level at Receptor (dBA)[2]	Ambient Level (dBA)[3]	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
SR-1	Single Family Residential, 6506 Barton Avenue and 913 Seward Street *(represented by noise measurement ST-1)*	250	38.0	58.6	58.6	0.0	5.0	**No**
SR-2	Multifamily Residential, 945 N Hudson Avenue (*represented by noise measurement* ST-2)	50	52.0	53.6	55.9	2.3	5.0	**No**
SR-3	Single Family Residential, 1006 N. Hudson Avenue *(represented by noise measurement ST-3)*	250	38.0	53.6	53.7	0.1	5.0	**No**
SR-4	Multifamily Residential, 6511 Romaine Street *(represented by noise measurement ST-4)*	260	37.7	58.0	58.0	0.0	5.0	**No**

1. Distance estimated using location of rooftop equipment as indicated on Roof Plan.
2. Distance attenuation calculated assuming reference noise level of 52 dBA Leq at 50 feet: Source for reference level: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010.
3. See Table 22 and Table 23 for representative ambient noise levels.

[126] *Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2016.*

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. According to the Average Daily Traffic (ADT) Volumes provided in the traffic analysis prepared by Kimley Horn, the proposed project would increase the ADT volume that would result in noise increases on Project Site area roadways. Traffic noise levels for roadways primarily affected by the Project were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on traffic volumes from the Transportation Assessment. As shown in **Table 26**: *Opening Year and Opening Year Plus Project Traffic Noise Levels*, Opening Year Plus Project traffic-generated noise levels on Project Site area roadways would range between 46.4 dBA CNEL and 57.1 dBA CNEL at 100 feet from the roadway centerline, and the Project would result in a maximum increase of 0.6 dBA CNEL along Romaine Street. Increases in traffic noise would not result in increases beyond acceptable levels (see Thresholds section above). Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 26: Opening Year and Opening Year Plus Project Traffic Noise Levels

Roadway Segment	Opening Year		Opening Year + Project		Incremental Increase	Significant Impact?
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]		
Seward Street between Romaine and Willoughby	1,381	49.7	1,412	49.8	0.1	**No**
Romaine Street between Seward and Hudson	1,485	50.0	1,735	50.7	0.7	**No**
Hudson Avenue between Romaine and Willoughby	989	48.3	1,052	48.6	0.3	**No**
Willoughby Avenue between Seward and Hudson	5,419	55.7	5,435	55.7	0.0	**No**

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level
Traffic noise levels are at 100 feet from the roadway centerline.
Source: Based on traffic data provided by Kimley-Horn and Associates, Inc., October 2023.

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

Construction

Less than Significant with Mitigation Incorporated

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA and Caltrans have published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA and Caltrans guidelines show that a vibration level of up to 0.50 in/sec is considered safe for newer residential structures and modern commercial and industrial structures and would not result in any construction vibration damage and a vibration level of 0.04 in/sec is unpleasant.[127]

Receptors susceptible to building damage include all structures located adjacent to the Project Site including the residential structure and commercial structure to the south. This evaluation uses the Caltrans architectural damage criterion for continuous vibrations of 0.3 in/sec peak particle velocity (PPV) at older residential structures and 0.25 in/sec PPV for historic structures, and human annoyance criterion of 0.40 in/sec PPV in accordance with FTA and Caltrans guidance.[128, 129]

Table 27: *Typical Construction Equipment Vibration Levels* lists the reference vibration levels for typical construction equipment (measured at 25 feet). The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 27**, based on FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.21 in/sec PPV at 25 feet from the source of activity. The use of loaded trucks and a vibratory compactor/roller could be operated at a distance of approximately 10 feet from the adjacent multi-family housing located on North Hudson Avenue to the south of the Project Site and approximately 300 feet from the nearest historic structure (Hollywood Center Studio).

[127] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[128] Ibid
[129] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual,* 2020

Table 27: Typical Construction Equipment Vibration Levels

Equipment	Reference Level PPV at 25 Feet (in/sec)	PPV at 10 Feet (in/sec)	PPV at 20 Feet (in/sec)	PPV at 300 Feet (in/sec)
Loaded Trucks	0.076	0.300	0.106	0.014
Vibratory compactor/roller	0.21	0.830	0.293	0.039
Structural Damage Threshold	**0.20**	**0.30**	**0.30**	**0.25**
Exceeds Thresholds?	--	**Yes**	**No**	**No**
Human Annoyance Threshold	--	**0.40**	**0.40**	**0.40**
Exceeds Thresholds?	--	**Yes**	**No**	**No**

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
* Equipment not anticipated to be required at this distance.

As shown in **Table 27**, vibration levels at the nearest historic structure would not exceed the 0.25 in/sec PPV threshold for historic buildings. Therefore, impacts to historic structures would be less than significant. At 10 feet (nearest structures to the south), construction equipment vibration velocities would exceed the 0.30 in/sec PPV threshold for structural damage and the human annoyance threshold of 0.40 in/sec PPV. As described in PDF NOI-PDF-5, all construction haul, dump, and water trucks would be operated within the northern portion of the Project Site to provide efficient access to the highway. This area is located greater than 20 feet from any sensitive receptors. As shown in Table 27, vibration from loaded trucks would not exceed structural damage or human annoyance thresholds at 20 feet. With regard to vibratory rollers, **MM NOI-1** prohibits the use of a vibratory compactor or roller within 20 feet of any adjacent residential structure. With implementation of **MM NOI-1**, vibration velocities would be 0.293 in/sec PPV for a vibratory compactor/roller, which would not exceed structural damage or human annoyance thresholds of 0.30 in/sec and 0.40 in/sec, respectively. Impacts would be less than significant with mitigation incorporated.

Mitigation Measure

MM NOI-1 The use of a vibratory compactor or roller shall be a minimum of 20 feet away from any adjacent structure. Any activity requiring a compactor or roller within 20 feet of an adjacent structure shall be conducted using a non-vibratory/static roller or a walk-behind roller.

Off-Site Construction Vibration

With regard to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. According to the FTA's Transit Noise and Vibration Impact Assessment, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways.[130] Multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors because each truck passing is a single vibration event that ceases once the truck has passed. Therefore, vibration impacts associated with construction of the proposed Project would be less than significant and no mitigation measures are required.

[130] Ibid.

Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles and small box trucks commonly used for household moving/storage purposes used by employees and customers accessing the surface parking, and occasional loading and unloading at the southeast portion of the Project Site. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways.[131] In addition, as described above, most vehicular requirements for tenants at the proposed facility would use a personal van/pickup truck. Less frequently, a small 10 to 15 foot U-Haul truck (non-diesel) could be used by tenants. Larger trucks or diesel-powered vehicles will not be necessary or common, and larger cross-country moving trucks will not be able to access parking lot due to limited space. Therefore, operation of the Project would result in less than significant ground-borne vibration impacts no mitigation is required.

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

No Impact. The Project Site is located approximately 8.4 miles south of the Hollywood-Burbank Airport and is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport. The Project Site is not located within an existing or projected noise contour associated with any private or public airport. Therefore, no impacts would occur, and no mitigation measures are required.

Cumulative Impacts

Cumulative Construction Noise

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. Construction noise would be periodic and temporary noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. The nearest related project is located at 1000-1006 Seward Street, located 260 feet north of the Project Site. According to the Draft EIR related to the Project, project construction is anticipated to occur in 2022, with a completion date of 2025. The proposed Project would be under construction as early as 2025 and is anticipated to be complete in 2026. Therefore, there is potential for overlapping construction activities between the two projects. Construction activities at other planned and approved projects near the Project Site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its

[131] Ibid.

source, noise impacts would be limited to the Project Site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable.

Cumulative Operational Noise

Cumulative Off-Site Traffic Noise. The cumulative mobile noise analysis is conducted in a two-step process. First, the combined effects from both the Project and other projects are compared. Second, for combined effects that are determined to be cumulatively significant, the Project's incremental effects are then analyzed. A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by the Project combined with the traffic noise increase generated by cumulative projects.

The following criteria is used to evaluate the combined effect of the cumulative noise increase.

- Combined Effect. The cumulative with Project noise level ("Cumulative With Project") would cause a significant cumulative impact if a 3.0 dB increase over "Existing" conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.

Although there may be a significant noise increase due to the Project in combination with identified cumulative projects (combined effects), it must also be demonstrated that the Project has an incremental effect. In other words, a significant portion of the noise increase must be due to the Project. The following criteria have been utilized to evaluate the incremental effect of the cumulative noise increase.

- Incremental Effects. The "Cumulative With Project" causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded and if noise levels exceed acceptable noise levels. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed Project and growth due to occur in the general area would contribute to cumulative noise impacts. **Table 28:** *Cumulative Plus Project Buildout Conditions Traffic Noise Levels* identifies the traffic noise effects along roadway segments in the vicinity of the Project site for "Existing," "Cumulative Without Project," and "Cumulative With Project," conditions, and net cumulative impacts.

Table 28: Cumulative Plus Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL @ 100 feet from Centerline			Combined Effects	Incremental Effects	Cumulatively Significant Impact?
	Existing	Cumulative Without Project	Cumulative With Project	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
Seward Street between Romaine and Willoughby	49.6	50.7	50.8	1.2	0.1	No
Romaine Street between Seward and Hudson	50.0	52.0	52.5	2.5	0.5	No
Hudson Avenue between Romaine and Willoughby	48.2	49.6	49.8	1.6	0.2	No

Table 28: Cumulative Plus Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL @ 100 feet from Centerline			Combined Effects	Incremental Effects	Cumulatively Significant Impact?
	Existing	Cumulative Without Project	Cumulative With Project	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
Willoughby Avenue between Seward and Hudson	55.6	55.7	55.8	0.2	0.1	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL = day-night noise level
1. Traffic noise levels are at 100 feet from the roadway centerline.

First, it must be determined whether the "Cumulative With Project" 3.0 dB increase above existing conditions (*Combined Effects*) is exceeded. Next, under the *Incremental Effects* criteria, cumulative noise impacts are defined by determining if the forecast ambient ("Cumulative Without Project") noise level is increased by 1.0 dB or more. As shown in **Table 28**, neither Combined Effects (3.0 dB) nor Incremental Effects (1.0 dB) criteria have been exceeded. Thus, the Project, in combination with cumulative background traffic noise levels, would result in a less than significant cumulative impact. The Project's contribution to traffic noise would not be cumulatively considerable.

Cumulative Stationary Noise. Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project Site vicinity. However, as discussed above, operational noise caused by the Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there were such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project Site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project specific noise impacts, would not be cumulatively significant.

4.14 POPULATION AND HOUSING

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING. Would the project:				

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

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

Less than Significant Impact.

Construction

Construction of the Project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their temporary employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the Los Angeles metropolitan region that moves from project to project. Given the short duration of the work for each job, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project.

Operation

Direct Growth

The Project does not propose the removal or the development of housing and would, therefore, not result in substantial or unplanned population growth as a result of the on-site generation or off-site replacement of housing. The Project would result in the construction of 168,478 square feet storage building. Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs. A storage facility of this size would typically employ up to two people. Representing 0.001 percent of this increase, the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth as it is reasonable to expect that some of the new employees would be drawn from the existing local labor force

within the City. Moreover, the Project Site and City are well-served by existing transit options, which would be readily available for out-of-area employees to use to commute to and from their jobs at the Project Site. Because the Project's employees would be accounted for in local and regional planning forecasts and would not result in an increase in the demand for additional housing, and because the Project Site is located in a highly developed area with transit options, the Project would not result in substantial or unplanned direct population growth.

Indirect Growth

The Project is located in a developed urbanized area and would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As the Project would be supported by the existing urban infrastructure, the Project would not result in indirect unplanned population growth and impacts would be less than significant.

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

No Impact. The Project Site is currently developed with 40,000 sf film storage building, truck rental, and parking uses. The Project would not involve the demolition, removal, or change in use of any existing residential uses. As such, the Project would not displace substantial numbers of existing people or housing and the construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

The Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would increase on-site employment, these increases would not be expected to cause a substantial number of new households to move to the Hollywood Community Plan area or to generate a demand for substantial new housing. Further, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, Project population and housing impacts would be less than significant. In addition, while the related projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

4.15 PUBLIC SERVICES

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

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

i) Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services for the Project and the Project Site would be provided by the Los Angeles Fire Department (LAFD). The LAFD's 3,510 uniformed fire personnel protect life, property and the environment through their direct involvement in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. An equally committed non-sworn cadre of 392 professional support personnel provide technical and administrative expertise in their corresponding pursuit of the department's mission. A total of 1,018 uniformed firefighters are on duty at fire department facilities citywide, including 106 neighborhood fire stations located across the Department's 468.74 square-mile jurisdiction.[132]

[132] https://www.lafd.org/about/about-lafd/our-mission, accessed December 6, 2023.

The LAFD has five fire stations that would provide initial response to the Project Site, they include Fire Stations 27, 41, 82, 52 and 61.[133] **Table 29:** *LAFD Fire Stations Located in the Vicinity of the Project Site*, provides information on the location, the approximate distance/direction from the Project Site, and the average response time.[134]

Table 29: LAFD Fire Stations Located in the Vicinity of the Project Site

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Operational Response Time[b]
Fire Station 27	1327 North Cole Ave.	0.5 mile	7:06 (EMS) 6:30 (non EMS) 5:44 (Critical ALS) 5:02 (Structural Fire)
Fire Station 41	1439 North Gardner St.	1.3 miles	7:46 (EMS) 7:57 (non EMS) 6:38 (Critical ALS) 6:00 (Structural Fire)
Fire Station 82	5769 Hollywood Blvd.	1.4 miles	7:17 (EMS) 6:48 (non EMS) 6:06 (Critical ALS) 5:51 (Structural Fire)
Fire Station 52	4957 Melrose Ave.	1.5 miles	6:52 (EMS) 6:29 (non EMS) 5:36 (Critical ALS) 5:17 (Structural Fire)
Fire Station 61	5821 West 3rd St.	1.7 miles	7:36 (EMS) 7:25 (non EMS) 6:11 (Critical ALS) 5:35 (Structural Fire)

Structural Fire: The type of call reserved when the Los Angeles Police Department receives a report of a building or structure that is actively burning.
EMS = Emergency Medical Services; ALS = Advanced Life Support
Sources:
[a] From January to September 2023. LAFD, Find Your Station. https://www.lafd.org/fsla/stations-map.
[b] FIRESTATLA http://www.lafd.org/fsla/stations-map. Accessed December 6, 2023.

Construction

The Project includes the demolition of an existing 40,000 sf film storage building and its associated parking lot and truck rental business and the construction of a seven-story, 168,478 sf storage building and would not involve the construction or physical alteration of a fire station.

Typical of construction projects in general, construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements

[133] https://www.lafd.org/fsla/stations-map, accessed December 6, 2023.
[134] https://www.lafd.org/fsla/stations-map, accessed December 6, 2023.

of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2019 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

During construction, the Project would intermittently experience continuous concrete pour and right-of-way improvements which may temporarily disrupt sidewalks near the Project Site along N. Seward Street, Romaine Street, and Hudson Avenue. A covered pedestrian walkway would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans. During construction, traffic on Romaine Street would be intermittently disrupted. Romaine Street is classified as a Local Street in the City of Los Angeles Mobility Plan and is a two-lane roadway (one lane in each direction). At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, **PDF TRAF-1: Construction Management Plan,** would be implemented that would include a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. Parking closure across the property frontage would be requested to allow for ongoing construction access and possible staging. This impact would be less than significant with implementation of the Construction Management Plan.

Due to the limited duration of construction activities, the Project Site's proximity to five fire stations, implementation of a Construction Management Plan, and compliance with applicable codes, Project-related construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

Therefore, construction impacts on fire protection and emergency medical services would be less than significant and no mitigation measures are required.

Operation

Operational activities associated with the Project could increase the demand for fire protection and emergency medical services. As discussed under Section 4.14. *Population and Housing*, the Project would not include any residential uses and would result in up to two employees at the Project Site. The employees generated by the Project would be within local and regional employment projections.

The Project would also be required to comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the LAMC, and the LAFD to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwell, and elevator systems (including emergency and fire control elevators) that meet code requirements.
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g., floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

The City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading be prepared for review and approval by the LAFD.

The Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required, nor would the Project be subject to wildfire risk.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards.

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, in the *Utility Technical Report*, a LADWP Service Advisory Request (SAR) and LADWP "Information of Fire Flow Availability Request" (IFFAR) were submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. The IFFAR was approved by LADWP on January 30th, 2024. The results indicate three hydrants have available fire flow of 1,500 gpm each.

The SAR results show that 1,500 gpm can be delivered to the Project with a maximum residual pressure of 130 psi. Based on this information, the existing infrastructure can provide adequate water flow and pressure to the Project.

The Project Site vicinity is well served by five nearby fire stations within close proximity to one another and the Project Site. These LAFD fire stations would provide fire protection and emergency medical services to the Project Site area and are dispatched based on availability and the nearest unit to a service call. The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. However, a number of factors would serve to facilitate LAFD responses to emergency calls. Emergency responses are routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, by driving in lanes of opposing traffic, by the use of alternate routes, and by multiple station response.

The Project Site is located outside of hazardous/hillside areas. Because of the grid pattern of the local street system and the proximity to multiple freeways, each of the nearby fire stations has multiple routes available to respond to emergency calls at the Project Site.

With the Project's compliance with applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access), the Project's ability to meet fire water supply needs, and its location close to several LAFD stations, and with its incorporation of a Construction Management Plan, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that the construction of either new or expanded fire facilities would be required. Furthermore, the LAFD would review the Project and make recommendations, including any potential modifications to building plans, to reduce the risk of and susceptibility to the spread of fires, as determined by LAFD. LAFD also continues to monitor population growth and land development throughout the City and to identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possible station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time.

Based on the above, and with the Project's incorporation of project design feature PDF-TRAF-1, the Project would not create the need for the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, to maintain service, and the potential for a physical impact associated with the construction of fire facilities is considered less than significant and no mitigation measures are required.

ii) Police protection?

Less than Significant Impact. Police protection for the Project and the Project Site would be provided by the Los Angeles Police Department (LAPD). The nearest LADP station to the Project Site is the Hollywood Community Police Station, which is located at 1358 N. Wilcox Avenue, approximately 0.5 miles from the Project Site. Hollywood Community Police Station's geographical area of patrol is approximately 17.2 square miles.[135]

Some of the communities in this area served by this station are Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue and Los Feliz Estates.

[135] Correspondence LAPD, Gisselle Espinoza, Commander Department Homeless Coordinator Office of Operations, November 28, 2023.

(LAPD's Operations West Bureau).[136] The Los Angeles Police Department currently has 8,932 sworn personnel and 3,347 civilian employees. here are many specialized support units, divisions, sections and services available to Hollywood's Division within the LAPD (i.e., Air Support, Detectives, Bike Unit, K9 and Metro/ SW AT) to support any additional policing needs Hollywood Division may encounter.

Hollywood Community Police Station's emergency response system is directly linked to the Los Angeles Police Department's Communication and Dispatch Center. Communication Division has the responsibility to staff this Dispatch Center. The staff are incident trained personnel that will respond to radioed and telephoned calls for service. They would then dispatch these requests to the proper emergency and non-emergency personnel required or requested. Then they would provide the city personnel involved with the necessary information to execute their duties for any given incident. These operations are performed on a 24 hour a day, 7 days a week, 365 days a year basis.[137]

Construction

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the demand for police services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, the Project Applicant has incorporated into the Project PDF-PS-1, which requires the construction site to be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

During construction, the Project would intermittently experience continuous concrete pour and right-of-way improvements which may temporarily disrupt sidewalks near the Project Site along N. Seward Street, Romaine Street, and Hudson Avenue. A covered pedestrian walkway would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans. During construction, traffic on Romaine Street would be intermittently disrupted. Romaine Street is classified as a Local Street in the City of Los Angeles Mobility Plan and is a two-lane roadway (one lane in each direction). At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, **PDF TRAF-1: Construction Management Plan,** would be implemented that would include a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. Parking closure across the property frontage would be requested to allow for ongoing construction access and possible staging. This impact would be less than significant with implementation of the Construction Management Plan,

Furthermore, given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing discussed in PDF-PS-1, the Project's construction activities are not expected to increase demand on

[136] Ibid.
[137] Correspondence LAPD, Gisselle Espinoza, Commander Department Homeless Coordinator Office of Operations, November 28, 2023.

existing police services to an extent that a new police facility would be required. Therefore, the Project would have a less than significant temporary impact on police protection.

Operations

Operational activities associated with the Project could increase the demand for police protection. The Project would not include any residential uses and would result in two employees at the Project Site. The new employees generated by the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth, necessitating a high demand for police services. According to correspondence from the LAPD, there are no planned improvements to the Hollywood Area Community Police Station and or it's protection facilities currently.[138] Additionally, there are no special police protection requirements needed by law enforcement because of the specific attributes of the Project.[139] Furthermore, according to the LAPD, the Project, individually or combined with other past or present projects, will not result in the need for new or altered police facilities.[140]

As required by the City, the Project would include standard security measures such as adequate security lighting and keyed access to the creative office building including controlled access to door and parking facilities. In addition, the LAPD will require that the commanding officer of the Community Area be provided a diagram of the property showing access routes, and any additional information that might facilitate police response (PDF-PS-2). These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demand upon police protection services would be relatively low, and would not necessitate the construction of a new or expanded police station, the construction of which may cause significant environmental impacts.

Project Design Features

PDF-PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF-PS-2: Prior to the occupancy of the Project, the Applicant shall provide the Hollywood Community Police Station with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

iii) Schools?

No Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the Project Site. The Project would have less than significant impacts on schools because it would be subject California Government Code Section 65995, which allows Los Angeles Unified School District (LAUSD) to collect impact fees from developers of new residential developments. The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children.

[138] Correspondence LAPD, Gisselle Espinoza, Commander Department Homeless Coordinator Office of Operations, November 28, 2023.
[139] Ibid.
[140] Ibid.

Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, no impacts related to an increased demand for school facilities would occur under the Project and no mitigation measures are required.

iv) Parks?

No Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses. Therefore, no open space requirements would apply to the Project. The Project would not provide private open space. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. Therefore, no impacts related to an increased demand for park facilities would occur under the Project and no mitigation measures are required.

v) Other public facilities?

No Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The Project Site would be served by the John C. Fremont Branch Library, which is located at 6121 Melrose Avenue approximately 0.4-mile south of the Project Site.

The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for public facilities would be negligible. The Project is not expected to create a demand for library services as no new residential population would be generated, and most employees would likely visit libraries near their homes. As such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. Therefore, no impacts related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures are required.

Cumulative Impacts

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site-specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time. The Project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

Furthermore, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Due to the fact that there are five LAFD Stations within less than 2.0 miles of the Project Site, including Fire Station 27, which is approximately 0.5 mile away from the Project Site, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. In addition, like the Project, the related projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons. Each related project would be subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented.

Furthermore, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's General Funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, cumulative impacts would be less than significant.

Schools

Pursuant to Government Code Section 65995 the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations

regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project.

Accordingly, in compliance with SB 50, impacts on public schools from related projects would remain less than significant with payment of school impact fees. Furthermore, as the Project would also pay school impact fees and no residential uses would occur under the Project. Therefore, the Project would not contribute considerably to any cumulative impacts to schools or libraries, and cumulative school impacts would be less than significant.

Parks

A significant impact to parks may occur if implementation of a Project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses. The Project would not provide private open space. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes and no substantial new demand for parks and recreational facilities would occur. Moreover, related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand, and the related projects. Furthermore, the related Projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC (e.g., provision of parkland and/or payment of in-lieu fees), as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Other Governmental Services

With respect to libraries, Project would not generate a direct residential population that could increase the demand for libraries. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhanced library services, as deemed appropriate. Therefore, the Project would not contribute considerably to any cumulative impacts to libraries, and cumulative libraries impacts would be less than significant.

4.16 RECREATION

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

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

No Impact. As discussed in the Response to Checklist Question XV(d) above, the Project does not propose the development of residential uses which would create a demand on nearby parks or recreational facilities. The Project would not be open to the public; therefore, no open space requirements would apply to the Project. The Project would not provide open space. A storage facility of this size would typically employ up to two people. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Therefore, no impact would occur.

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

No Impact. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

Cumulative Impacts

No Impact. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

4.17 TRANSPORTATION

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

This section assesses potential project impacts based on the *956 N. Seward Street Project* (Transportation Assessment) prepared by Kimley-Horn dated January 2024, provided in Appendix K. The Transportation Assessment was prepared in accordance with the latest version of City of Los Angeles Department of Transportation (LADOT)'s Transportation Assessment Guidelines (TAG) (August 2022). A Referral Form describing the project along with trip generation was submitted to and approved by LADOT. The Referral Form concluded that additional traffic studies such as VMT Analysis, Access, Safety, and Circulation Evaluation, and Access Assessments were not required; therefore, a Memorandum of Understanding (MOU) form was not required per LADOT. The Referral Form is included in Appendix K.

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

Less Than Significant Impact. As discussed in the Transportation Assessment, the Project would not conflict with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives.

Threshold T-1 of the TAG states that a project would result in an impact if it conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. Thus, the transportation requirements for proposed developments should be consistent with the City's transportation goals and policies.

As discussed in the Transportation Assessment, the Project would be consistent with and would not impede the City's implementation of the Mobility Plan 2035, would be consistent with the policies of the

Hollywood Community Plan, and the Project has been found to be consistent with the Connect SoCal, the SCAG RTP/SCS. Furthermore, the Project would comply with existing applicable City ordinances (e.g., the City's existing transportation demand management (TDM) Ordinance in LAMC Section 12.26.J) and other requirements pursuant to the LAMC. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. Bicycle parking facilities would be provided on-site as part of the Project. The Project's access locations would be designed in compliance with City standards and safety requirements to be provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls.

Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, Project impacts related to Threshold T-1 would be less than significant.

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

Less Than Significant Impact. The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amends the Appendix G (of the CEQA Guidelines) question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). Section 15064.3, subdivision (b)(1) states the following:

Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. Comprehensive updates to the CEQA Guidelines were certified and adopted by the California Natural Resources Agency in December 2018. Accordingly, the City adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G (of the CEQA Guidelines) question:

Threshold T-2.1: For a land use project, would the project conflict or be inconsistent with CEQA guidelines Section 15064.3, subdivision (b)(1)?

For land use projects, the intent of this threshold is to assess whether a land use project or plan causes substantial vehicle miles traveled. The City has developed the screening and impact criteria (discussed below) to address this question. The criteria below are based on the OPR technical advisory but reflects local considerations.

If the project requires a discretionary action, and the answer is no to either of the following, further analysis will not be required and a "no impact" determination can be made for the threshold:

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

The following additional screening criteria are used to determine any potential significant impacts for Project's that meet the first two screening criteria:

- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?
- Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

The City's VMT impact criteria for development projects is specified in the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. (See Table 30)
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located. (See Table 30)
- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT.
- For other land use types where the threshold is not further specified below, measure VMT impacts for the work trip element using the criteria for office projects above. (see Table 30)

Table 30: LADOT VMT Impact Criteria (15% Below APC Average)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central*	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

*Project APC
Source: LADOT TAG

The Project is estimated to generate 241 net daily trips. Because the Project is not generating more than the City's 250 daily vehicle trips threshold, no further analysis is required, and a "no impact" determination can be made. Additionally, the LADOT Referral Form (contained in **Appendix K**) confirms VMT analysis is not required. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project does not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility, and no significant impact would occur. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. Bicycle parking facilities would be provided on-site as part of the Project. The Project's access locations would be designed in compliance with City standards and safety requirements to be provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls.

Vehicular access to the Project Site is currently provided by one driveway on N. Seward Street and two driveways on Romaine Street. The Project proposes to close the existing driveway on N. Seward Street and one driveway on Romaine Street. Vehicular access to the Project would be limited to two driveways: (1) one driveway along Romaine Street would provide two-way entry/exit to the parking lot and (2) the other driveway would provide a one-way exit to Hudson Avenue. There would be four on-site loading docks as well.

None of the streets within the study area are along the City's High Injury Network (HIN). The Project's new driveways would be designed to comply with LADOT standards. Both driveways are on low volume local streets with no existing bike lanes or transit facilities. Therefore, the Project would not be expected to increase hazards or conflicts.

Therefore, impacts would be less than significant, and no mitigation measures are required. d) Result in inadequate emergency access?

Less Than Significant Impact.

Construction

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

Temporary Traffic Constraints

During construction, the Project would intermittently experience continuous concrete pour and right-of-way improvements which may temporarily disrupt sidewalks near the Project Site along N. Seward Street, Romaine Street, and Hudson Avenue. A covered pedestrian walkway would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans. During construction, traffic on Romaine Street would be intermittently disrupted. Romaine Street is classified as a Local Street in the City of Los Angeles Mobility Plan and is a two-lane roadway (one lane in each direction). At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, **PDF TRAF-1: Construction Management** Plan, would be implemented that would include a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. Parking closure across the property frontage would be requested to allow for ongoing construction access and possible staging.

Temporary Loss of Access

The existing land uses in the proximity of the construction site would remain open throughout construction. Pedestrian and vehicular access to properties nearby the Project Site would also remain open for the duration of construction. The sidewalks at the Project Site frontages along N. Seward Street, Romaine Street, and Hudson Avenue would be closed intermittently during the construction and access would be provided via a covered pedestrian walkway. Appropriate signage would be implemented to direct pedestrians to accessible routes during this time.

Temporary Loss of Bus Stops or Rerouting of Bus Lines

The construction of the Project would not result in any temporary loss of bus stops or rerouting of bus lines.

Haul Route

The proposed haul route for the Project would require trucks to access the Project Site from the nearby US 101 using Santa Monica Boulevard (State Route 2). The maximum number of daily truck trips is estimated to be 109 trips per day and would occur during the peak construction phase (extending over 176 days).

As part of the Project, a detailed Construction Management Plan, included as PDF TRAF-1**,** would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures to ensure that access would remain unobstructed for land uses in proximity to the Project Site. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities. Therefore, impacts would be less than significant, and no mitigation measures are required.

Project Design Feature

PDF TRAF-1: Construction Management Plan

The contractor would develop a Construction Management Plan as part of the Project and submit it to the City of Los Angeles for approval to reduce the Project's potential construction impact. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project Site is maintained.
- Pick-ups, deliveries and exports of construction materials should be scheduled during off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Construction truck contractor should provide off-site staging in a legal area.

- Determine the number and location of flag personnel required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.

Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclist and pedestrians around the area during any parking, travel lane or sidewalk closures.

Operation

Project operation would generate traffic in the Project vicinity and increase traffic within the area. However, emergency access to the Project Site and surrounding area would continue to be provided on adjacent streets similar to existing conditions. The Project Site is located along Seward Street, Romaine Street and Hudson Avenue, which are not designated as a Primary or Secondary Disaster Routes; however, Santa Monica Boulevard, Le Brea Avenue and Highland Avenue in the vicinity of the Project Site are identified as Primary Disaster Routes.[141] These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. In addition, the Project is required to meet LAMC code requirements for adequate emergency access and comply with LAFD access requirements. The Project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings, and on-site vehicle restrictions to ensure safe access. LAFD approval of plot plans showing fire hydrants and access for the Project would be required prior to the recording of the final map. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Project. Prior to the occupancy of the Project, LAPD would be provided with a diagram of the property, including access routes, and additional information to facilitate potential LAPD responses (see PDF-PS-2).

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Whether a project would have a potential cumulative VMT impact is determined by assessing its consistency with the Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), per LADOT's TAG. Projects that are consistent with the RTP/SCS in terms of location, density, and land-use assist in meeting the region's air quality and greenhouse gas (GHG) goals.

The Project would be consistent with the SCAG regional plan as it is an infill development in a TPA, an area that promotes the use of a variety of transportation options, which include walking, biking, and the use

[141] Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf

of public transportation. Furthermore, the Project is located within close proximity to supporting land uses such as residential, industrial and commercial uses. Because the Project is consistent with the RTP/SCS and has a less than a significant VMT impact, the Project would have a less than significant cumulative impact on VMT.

With regard to design hazards, the Project would not result in a significant impact. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to a cumulative impact associated with hazardous design conditions would not be considerable.

Also, with regards to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

As with the Project, related projects would be reviewed by the LAFD and LADOT to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to a cumulative impact is not expected. Therefore, the Project's contribution to cumulative emergency access impacts would not be considerable. Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, as part of a Construction Management Plan, to reduce potential traffic impacts during construction. Also, pursuant to California Vehicle Code Section 21806, emergency vehicles are generally able to avoid traffic congestion in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact on emergency access, and the cumulative impact would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. Would the project:				
a) 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: i) Listed or eligible for listing in the California				
i) 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)?	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

a) 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: i) Listed or eligible for listing in the California:

i) 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)?

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact.

Less Than Significant Impact. As part of the *Archaeological Resources Assessment for the 956 Seward Project*, prepared by Kimley-Horn, a Sacred Lands File (SLF) search request was submitted to the Native American Heritage Commission (NAHC) on September 22, 2023. Results were received on November 17, 2023, noting there are no Sacred Lands File (SLF)s on file with the NAHC within or adjacent to the Project area. Kimley-Horn conducted a records search at the South Central Coastal Information Center (SCCIC) on November 1, 2023 to identify any previously recorded archaeological resources or previously conducted cultural resources studies within the Project area plus a 0.5 mile buffer. The results of the records search noted that no previous studies have taken place and no resources have been recorded within the Project area. Further, while thirteen (13) cultural resources studies have been conducted within 0.5 mile of the Project area, no archaeological resources have been recorded.

On November 16, 2023, the City mailed a project notification letter to the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) to initiate the AB 52 tribal consultation process. On November 30, 2023, the City received the Tribe's request for tribal consultation. The City emailed the Tribe on November 30, 2023 requesting a date and time for consultation. The Tribe provided the option of a consultation via email and consultation began on December 7, 2023. The Tribe provided historic maps identifying the locations of villages and trade routes in the greater Hollywood region. The background information included, but was not limited to, excerpts from physical texts regarding Indigenous settlements and history, archival research letter responses, and proposed mitigation measures from the Tribe.

A review of the information provided by the Tribe did not find substantial evidence of an existing Tribal Cultural Resource within the Project area or the vicinity. Likewise, no evidence was submitted that is specific to the location of the Project Site, and no criteria was provided to indicate that the Project area should be considered sensitive as to require on-site monitoring for Tribal Cultural Resources to avoid potential adverse impacts. Furthermore, because the Project does not propose any subterranean structures and will be developed on grade, Project construction is unlikely to significantly disturb native soils, and is therefore not expected to impact Tribal Cultural Resources. The Geotechnical Report prepared for the project, which was provided to the Tribe on March 18, 2024, indicated the first 4-5 feet of the soil on site was non-native fill. The *Archaeological Resources Assessment for the 956 Seward Project*, which was submitted to the Tribe on June 27, 2024, similarly concluded that the likelihood of intact buried cultural materials on site within the first 4-5 feet was low due the existence of fill and the extent of prior disturbance.

As such, the City concluded that no Tribal Cultural Resources were identified within the Project area as a result of AB 52 tribal consultation. However, the Project will be subject to the City's standard Condition of Approval for the Inadvertent Discovery of Tribal Cultural Resources to ensure any impacts to Tribal Cultural Resources would be less than significant. On June 27, 2024, the City submitted their findings, proposed conditions, and intent to conclude consultation via written communication to the Tribe.

Condition of Approval: Tribal Cultural Resource Inadvertent Discovery

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities[142], all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Applicant 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 the Department of City Planning.

- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist

[142] Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity

and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- 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.

Cumulative Impacts

Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is diminished. Further, in association with CEQA review, future AB 52 consultations with Native American tribes in order to identify tribal cultural resources would be required for projects that have the potential to cause significant impacts to tribal cultural resources. Therefore, to the extent impacts on tribal cultural resources from cumulative projects may occur, contribution from the Project would not be cumulatively considerable and there would be no cumulative impact.

4.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the project:					
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The following impact analysis pertaining to utilities and service systems includes information contained in the *956 Seward Street Los Angeles, CA 90038, Utility Technical Memorandum*, prepared by Kimley-Horn, January 2023 (**6**).

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

Water

Less Than Significant Impact.

The facilities required to serve the Project Site include the large distribution system operated by the LADWP as well local infrastructure to meet the needs of the Project Site. As discussed under Section 6.19.b, below, LADWP can provide the needed water from its existing system pursuant of the provisions in the City of Los Angeles Urban Water Management Plan (UWMP) 2020. Therefore, LADWP would not require added facilities to meet the demand from the Project.

Existing water lines near the Project Site are owned and maintained by Los Angeles Department of Water and Power (LADWP). There are three (3) existing water mains surrounding the Project Site: an 8 inch water main 50 feet west of property within Seward Street, an 8 inch water main 16 feet north of the Project Site within Romaine Street, and an 8 inch water main 17 feet east of the Project within Hudson Avenue. The nearest, existing fire hydrant is located on the Project site at the southwest quadrant of the intersection between Romaine Street and Hudson Avenue.

Construction

Water for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. Based on construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). The estimated construction-period demand would be significantly less than the Project's estimated operational demand, which as described below, could be accommodated by the existing infrastructure. It is therefore anticipated that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

The Project would require construction of new, on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Therefore, as part of the Project, a Construction Management Plan (PDF-TRAF-1) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. In addition, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all water lines. LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Therefore, the Project would not require the relocation or construction of new or expanded water facilities related to construction of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required.

Operation

Water consumption estimates for the Project for the new development as shown on **Table 31:** *Estimated Water Demand For The Project,* based on the Los Angeles Bureau of Sanitation sewerage generation factors. An additional 20 percent has been added the sewerage generation factors to provide a conservative estimate for water consumption. It should be noted that the Project includes a leasing office associated with the primary storage use and not stand-alone office uses. However, to provide a conservative analysis, the leasing office was calculated separately. As shown below, the water demand that would be generated by operation of the Project would be 6,696 gpd, which would be an increase of 5,256 gpd over existing water consumption. For a conservative analysis, the storage building was calculated at a higher square footage (180,000 sf) than proposed.

The Project would utilize independent water connections for fire and domestic water service. In addition, the Project would include backflow preventers and will be metered separately per City requirements.

The Project's water demand would be reduced by its incorporation of ultra-low flow plumbing fixtures throughout the Project's new development and low irrigation landscaping. Therefore, the Project's impacts on water infrastructure capacity would be less than significant.

Table 31: Estimated Water Demand For The Project

Land Use	Units	Generation Rate (gpd/unit)*	Total Wastewater Generation (gpd)	Average Daily Flow (cfs)
Existing Uses				
Storage Uses	40,000 SF	30 GPD / 1,000 SF	1,200	0.00186
20% Contingency***			**1,440**	**0.00223**
Proposed Uses				
Storage Building	180,000 SF	30 GPD / 1,000 SF	5,400	0.0084
Leasing Office**	1,500 SF	120 GPD / 1,000 SF	180	0.00028
20% Contingency***			1,116	0.0017
Subtotal Proposed			**6,696 GPD**	**0.0104**
Net Increase			**5,256 GPD**	**0.00817**

*Sewage Factors are used to estimate total water consumption in Proposed Development
**Office building is selected for classification of the leasing office as it provides more conservative analysis
***A 20% contingency is applied for conservative estimation of water consumption to account for water usage and irrigation

Article 7 of the Fire Protection and Prevention, Section 57.507 of the LAMC sets the fire flow requirements for the Project. These guidelines, in addition to the requirements set by the City Fire Chief, will prescribe the fire flow requirements and hydrant spacing requirements for the Project. Based on fire flow standards set forth in Section 57.507 of the LAMC, the Project Site falls within the industrial commercial, which requires 6,000-9,000 gpm from 4 to 6 adjacent hydrants flowing simultaneously. This translates to 1,000-1500 gpm flowing from each hydrant and a minimum residual pressure of 20 pounds per square inch (psi).

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project.

In addition, a Service Availability Report (SAR) was submitted and approved on October 30, 2023, by the LADWP, to determine if the existing public water infrastructure could meet the demands of the Project. The SAR results show that 1,500 gpm can be delivered to the Project with a maximum residual pressure of 130 psi. LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project. LADWP's approach consists of analyzing their water system model near the Project. Based on the results, LADWP determines whether they can meet the Project fire hydrant flow needs based on existing infrastructure with the Information of the IFFAR.

The IFFAR was approved by LADWP on January 30th, 2024. The results indicate three hydrants have available fire flow of 1,500 gpm each. Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project and the Project would not require the relocation or construction of new or expanded water facilities. The impact would be less than significant, and no mitigation measures are required.

Wastewater

Less Than Significant Impact.

Existing sewer lines within the City of Los Angeles are maintained by the Los Angeles Sanitation District. Existing sewer system for the Project Site include an existing 12 inch VCP sewer line within Seward Street. Based on the Los Angeles Bureau of Engineering's online Navigate LA database, the 8-inch sewer main in Seward Street has a calculated capacity of 3.772 cubic feet per second (cfs) (2.03 million gallons per day (MGD)).

The City of Los Angeles has one of the largest sewer systems in the world including approximately 6,439 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.[143] The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the Los Angeles Bureau of Sanitation (BOS). The existing design capacity of the Hyperion Sewer System Service Area is approximately 450 million gallons per day. (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[144] Beginning in December 2011, California began experiencing the longest duration of drought on record. This has led to increased conservation for water resources. This has led to significant reductions in wastewater flows conveyed by the City's collection system over the past decade. An indication of this is the wastewater flow at Hyperion, which went from approximately 350 MGD to 260 MGD average daily flow.[145]

Construction

Wastewater would be generated throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation resulting from Project construction activities is not anticipated to cause any increase in wastewater flows. Construction impacts associated with the installation of new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor

[143] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed January 7, 2024.

[144] https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=17jkelqawo_82&_afrLoop=21735430323215481#! Accessed January 8, 2024

City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed January 7, 2024.

off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect to the public main.

Therefore, as part of the Project, a construction management plan (PDF-TRAF-1) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. Should perched groundwater be encountered during construction, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under the NPDES Construction General Permit regulations and the City's grading permit conditions. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, the Project impact on wastewater associated with construction activities would be less than significant.

Operation

The estimated sewer flows for the new development on the Project Site were based on the sewer generation rates per the Los Angeles Bureau of Sanitation sewerage generation factors. The Project is estimated will generate a peak flow of approximately 5,580 gpd with a net flow of 4,380 gpd to the 12 inch sewer line within Seward Street. This estimated flow is approximated using the Generation Factors and confirmation of capacity has been proved from the Sanitation District. LA Sanitation provided confirmation of sewer capacity via the Sewer Capacity Availability Request (SCAR) received on October 17, 2023. **Table 32**: *Estimated Wastewater For The Project*, below display the Project's wastewater demands.

Table 32: Estimated Wastewater For The Project

Land Use	Units	Generation Rate (gpd/unit)*	Total Wastewater Generation (gpd)	Average Daily Flow (cfs)
Existing Uses				
Storage Uses	40,000 SF	30 GPD / 1,000 SF	1,200	0.00186
Proposed Uses				
Storage Building	180,000 SF	30 GPD / 1,000 SF	5,400	0.0084
Leasing Office**	1,500 SF	120 GPD / 1,000 SF	180	0.00028
Subtotal Proposed			**5,580 GPD**	**0.00864**
Net Increase			**4,380 GPD**	**0.00678**

*Sewage Factors are used to estimate total water consumption in Proposed Development
**Office building is selected for classification of the leasing office as it provides more conservative analysis
***A 20% contingency is applied for conservative estimation of water consumption to account for water usage and irrigation

As further discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[146] The Project's proposed wastewater generation is approximately 0.005 MGD. Currently up to 300 MGD is treated at the Hyperion Treatment Plant, resulting in an available treatment

[146] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 22, 2023.

capacity of 150 MGD, which means the Project would account for approximately 0.0001 percent of the available capacity of the Hyperion Treatment Plant.[147] Consequently, impacts on wastewater treatment capacity would be less than significant.[148]

Stormwater

Less Than Significant Impact

The Project would comply with the City's Low Impact Development (LID) guidelines. Since infiltration has been deemed infeasible per the Preliminary Geotechnical Engineering Report of stormwater capture and reuse prior to biofiltration. Given there is insufficient landscape areas onsite to justify capture and reuse treatment, the Project proposes biofiltration to satisfy LID requirements. The LID treatment system is designed to capture and treat storm events up to the 85th percentile. Stormwater runoff generated from storm events greater than the design 85th percentile event will be conveyed via parkway drain(s) or curb drain(s) per city guidelines.

Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with NPDES Permit requirements.

Environmental impacts associated with the development of the project, including on-site drainage facilities, have been evaluated throughout this MND. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities would be less than significant. Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities.

Therefore, impacts to stormwater would be less than significant, and no mitigation measures are required.

Electricity

Less Than Significant Impact.

Construction

Electrical power would be consumed to construct the new buildings and facilities of the Project. Typical uses include temporary power for lighting, equipment, construction trailers, etc. The demand is typically supplied from existing electrical services within the Project Site and would not affect other services. Overall, demolition and construction activities would consume less electricity than the existing storage

[147] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2023.

[148] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2023.

building when operating. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant.

Operation

Once the Project is operational, it would create electricity demand. The estimated annual Project-related increase in the consumption of electricity would be approximately 3,303,894 kilowatt-hours (kWh). When compared to the LADWP's 2020-2021 sales of 20,936 GWh, the Project's estimated electricity demand would represent approximately 0.016 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. Further, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code.

The L.A. Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 4 electric vehicle charging stations. Therefore, the Project would not necessitate the construction of off-site electrical facilities or infrastructure improvements that would have the potential to cause a significant environmental impact.

Natural Gas

Less Than Significant Impact.

Construction

No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would be less than significant.

Operation

The Project building will not consume natural gas. The impacts would be less than significant, and no mitigation measures are required.

Telecommunications

Less Than Significant Impact. Any new telecommunication connections would be constructed by the private utility service provider and follow all appropriate regulatory requirements of such a connection. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would not result in the relocation or expansion of telecommunication facilities. The impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As stated above, using the City's generation rates, the Project is expected to generate a water demand of 6,696 gpd, which would be an increase of 5,256 gpd over existing water consumption. The Project would be designed to meet CALGreen and Title 24 Building Standards Code. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

The Metropolitan Water District's 2020 Regional UWMP addresses the future of Metropolitan Water District's water supplies and demand through the year 2045. To determine the overall service area reliability, the UWMP included three hydrologic conditions: average year (30- year median hydrology from FY 1985/86 to FY 2014/15); single-dry year (repeat of the 1989/90 hydrology); and multi-dry year (FY 1987/88 to FY 1991/92 hydrology). As noted in the 2020 UWMP, LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios through 2045. Achieving LADWP's water supply would include multiple strategies to achieve and maintain water use reductions, including investments in state-of-the-art technology; recycled water; stormwater recapture, installation of water-efficient fixtures and appliances, expansion and enforcement of prohibited water uses, reductions in outdoor water use, extending education and outreach efforts; and encouraging regional conservation efforts. Conservation and water use efficiency are a foundational component of LADWP's water resource planning efforts and will continue to be central to the City's water use efficiency goals over the long term.[149]

In the 2020 Regional UWMP, the projected 2045 water demand for a Single Dry Year is 1,551,000 acre-feet per year (afy), and the capability of current supplies 2,479,500 afy, a potential surplus of 928,500 afy, For multiple dry weather years, (FY 1988-1992 Hydrology scenario), the capability of current water supplies would be 2,239,000 afy; a potential surplus of 648,000 afy.

According to the reliability data in the City of Los Angeles 2020 UWMP, the most recent plan available, LADWP has sufficient supply to meet a total water demand of 746,000 in acre feet (af), by the year 2045. LADWP has programs to reduce the demand to 565,800 afy by 2045, a difference of 180,200 afy. As noted in the UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people and reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavior changes resulting from customer outreach and educational programs.

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Section 4.14, *Population and Housing*, the Project's employment contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at 4-year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion so long as the resulting growth does not

[149] https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln?_afrLoop=2426856792299 84&_afrWindowMode=0&_afrWindowId=1b2yajr4zp_1#%40%3F_afrWindowId%3D1b2yajr4zp_1%26_afrLoop%3D2426856792299 84%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1b2yajr4zp_17, accessed December 22, 2023.

exceed the growth projections. The UWMP is updated at regular five-year cycles and includes programs to meet the supply requirements. The Project's increase in water demand would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.

As there would be sufficient water supplies available to serve the Project, the impact regarding water supply would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As stated in Section 4.19.a, the Project will generate approximately 5,580 gpd of wastewater with a net flow of 4,380 gpd. Given the current capacity of the Hyperion Service Area, the Hyperion Service Area would have ample capacity to serve the project's wastewater generation, and as concluded in the SCAR the BOS would have adequate capacity to serve the Project. The Project would have a less than significant impact with respect to wastewater treatment capacity and no mitigation measures are required.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles BOS is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multifamily dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multifamily residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

In 2020, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 11 million tons (including an import amount of 178,374 tons. [150] The remaining disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 142.7 million tons as of December 2020, the most recent data available.[151] Waste from the City of Los Angeles is disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 142.7 million tons of remaining capacity within the County, 54.42 million tons, or approximately 38 percent, is located at the Chiquita Canyon landfill, which has a remaining life of 27 years. In addition to in-County landfills, out-of-County disposal facilities are also available to the City of Los Angeles.

[150] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2020 Annual Report. October 2021. Appendix E-2. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=16231&hp=yes&type=PDF.

[151] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2020 Annual Report. October 2021. Appendix E-2. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=16231&hp=yes&type=PDF.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2020 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, exportation of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill, in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.[152]

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at construction and demolition (C&D) facilities pursuant to new policies and programs, and the development of future recycling facilities.[153] Operation of the Project is estimated to generate 3.2 tons per year. [154]

This waste generation could be accommodated by the County's available regional landfills, and as discussed above. Furthermore, this is a conservative analysis as the Project waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025. Project construction would include the demolition of building and parking lot materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 84 percent.

Furthermore, the project would comply with CALGreen code Section 99.04.408, which would ensure that at least 65 percent of the demolition and construction waste generated would be recycled and/or salvaged. The amount of solid waste generated by the project is within the available capacities of area

[152] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2019. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=16231&hp=yes&type=PDF.

[153] Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=18725113866790843&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=17nhb0cqxu_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D18725113866790843%26_afrWindowMode%3D0%26_adf.ctrl-state%3D17nhb0cqxu_5, accessed December 6, 2023.

[154] Self-Storage : 2 employees = 8.93 lbs each per day= 17.86 lbs per day =3 .2 tons per year. Per City of Los Angeles. L.A. CEQA Thresholds Guide. 2006. Industrial Solid Waste Generation, pg. M 3-2.

landfills, and the Project's impacts to regional landfill capacity would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.

The City's SWIRP, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities pursuant to new policies and programs, and the development of future recycling facilities.

Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

Based on the factors discussed above, the Project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

Cumulative Impacts

Water Supply

All of the related projects are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval by LADWP and LAFD, with funding by the developers. Required improvements by related projects if they should occur, would be limited to minor, local improvements. Such improvements require only minor construction with very limited short-term construction impacts on traffic and perhaps noise. As noted above, the project would not require improvements to local mainlines.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects would need to be consistent with the SCAG RTP/SCS projections in order to be accounted for in LADWP's UWMP current and projected available water demand. As the LADWP's UWMP is based on growth projections in the SCAG RTP/SCS, no significant cumulative water supply impact is anticipated from cumulative development.

As discussed above, the Project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. The Project's contribution to a cumulative impact on water supply would not be cumulatively considerable and the cumulative impact regarding water supply would be less than significant.

Wastewater

The Project would result in the additional generation of sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity as it relates to the Project. Similarly, future projects connecting to the same sewer system would also be required to obtain sewer connection permits and submit SCARs to BOS during the design phase of the projects. As with the Project, all related projects in the City of Los Angeles would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. The analysis by the BOS takes into consideration previously approved SCARs as part of their review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related projects and BOS to construct the necessary improvements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (MGD) and the existing average daily flow for the system is approximately 300 MGD. Currently up to 300 MGD is treated at the Hyperion Treatment Plant resulting in a treatment capacity of 150 MGD. The estimated wastewater generation increase of the Project would be 0.012 MGD, which represents less than one percent of the available capacity in the system. The related projects would also be required to adhere to the BOS's annual wastewater flow increase allotment. Therefore, cumulative impacts on wastewater treatment capacity would be less than significant.

Electricity

As discussed in Section 4.6, *Energy*, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resource Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related projects would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would be less than significant.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission and CPUC. Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City of Los Angeles, as part of its SWIRP, aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. The analysis of the Project's potential impacts, above, is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing cumulative demand and increases in cumulative demand associated with growth including construction and operation of projects. Therefore, the analyses associated with that plan take into account cumulative development.

Like the Project, the related projects would be required to comply with applicable regulations related to construction and operation of solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the L.A. Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the project would be required to comply with all federal, State, and local regulations including the L.A. Green Building Code and the SWIRP.

The Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

4.20 WILDFIRE

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is located in a highly urban area and is Project Site is currently developed with a 40,000 square foot (sf) film storage building and an associated surface parking lot. The only vegetation permanently located on the Project Site is a limited amount of landscaping. The Project Site is located one block south of Santa Monica Boulevard and three blocks east of Highland Avenue, both designated as disaster routes, which may be utilized for an evacuation route during an emergency.[155] The Project Site is not located in an area of moderate or very high fire hazard.[156] Additionally, the Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[157] As the Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant, and no mitigation measures are required.

[155] Los Angeles County Department of Public Works, Disaster Route Maps, https://pw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf.

[156] State of California Office of the State Fire Marshall. Fire Hazard https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/, accessed October 18, 2023.

[157] CalFire Fire Hazard Severity Zones (FHSZ), adopted by CAL FIRE on September 29, 2023, https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones, accessed October 19, 2023

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in a hillside area and is not located in an area of moderate or very high fire hazard.[158] Additionally, the Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[159] As the Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant, and no mitigation measures are required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[160] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[161] Therefore, because the Project Site is not located near a state responsibility area nor any very high fire severity zone, with respect to wildfire hazards, construction and operation of the Project would not require installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts would occur, and no mitigation measures would be required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[162] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[163] The Project Site is surrounded by urban development and is not adjacent to any wildlands. The Project Site is not located with a 100-Year or 500-Year flood plain.[164]

The Project Site is relatively flat with little topography that would expose people or structures to landslides. The Project would not contain uses or activities that would exacerbate existing environmental conditions. The Project Site is not located within a landslide inventory area.[165] Combined with the fact that the Project Site is not within or near a state responsibility area or a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result

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158 State of California Office of the State Fire Marshall. Fire Hazard https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/, accessed October 18, 2023.

159 Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/ accessed October 3, 2023

160 Zimas Website, http://zimas.lacity.org/, accessed October 20, 2023.

161 CalFire, Fire Hazard Severity Zones (FHSZ) adopted by CAL FIRE on September 29, 2023 , https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones, accessed October 19, 2023.

162 Zimas Website, http://zimas.lacity.org/, accessed October 3 2023.

163 Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/, accessed October 3, 2023

164 Federal Emergency Management Agency (FEMA), National Flood Hazard FIRMette. https://msc.fema.gov/portal/search?AddressQuery=936%20Seward%20Street%2C%20los%20angeles%2C%20ca, accessed October 19, 2023.

165 Zimas Website, http://zimas.lacity.org/, October 3, 2023.

of runoff or post fire slope instability or drainage changes. Based on the above considerations, the Project which would have no wildfire impacts, would not result in a cumulatively considerable contribution to cumulative impacts associated with wildfires. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Therefore, no cumulative impacts related to this issue would occur.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently developed with a vacant warehouse building.

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan which applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site and parkway does include trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

The Project proposes to retain five trees, remove ten trees and plant a total of 38 trees (eight parkway trees and 30 on-site trees) which is 31 trees greater than is required for replacement trees (13 required replacement trees). Compliance with Mitigation Measures and regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Section 4.5, *Cultural Resources*, there would be no direct or indirect impacts to historical resources. With Project's incorporation of Conditions of Approval, potentially significant unforeseen impacts to archaeological resources would be reduced a less than significant. Impacts to human remains would be less than significant with adherence to applicable conditions of approval.

As discussed in Section 4.7, *Geology and Soils*, based on the results of the Paleontological Resources Assessment it was determined that the Project Site has a potential to encounter paleontological resources and could have a potentially significant impact. However, with the Project's adherence to the City's standard condition of approval, the Project would result in less than significant unforeseen impacts to paleontological resources.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment, with incorporation of mitigation measures.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." [166] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[167] As listed in **Table 33** and **Figure 9** the City identified 8 related projects within an approximately 0.5-mile radius of the Project Site.

The cumulative analyses for each environmental issue are provided following the assessments of Project impacts. The related projects are utilized to analyze cumulative impacts associated with project implementation discussed above. As described above, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the regulatory compliance measures and mitigation measures previously identified in this IS/MND, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

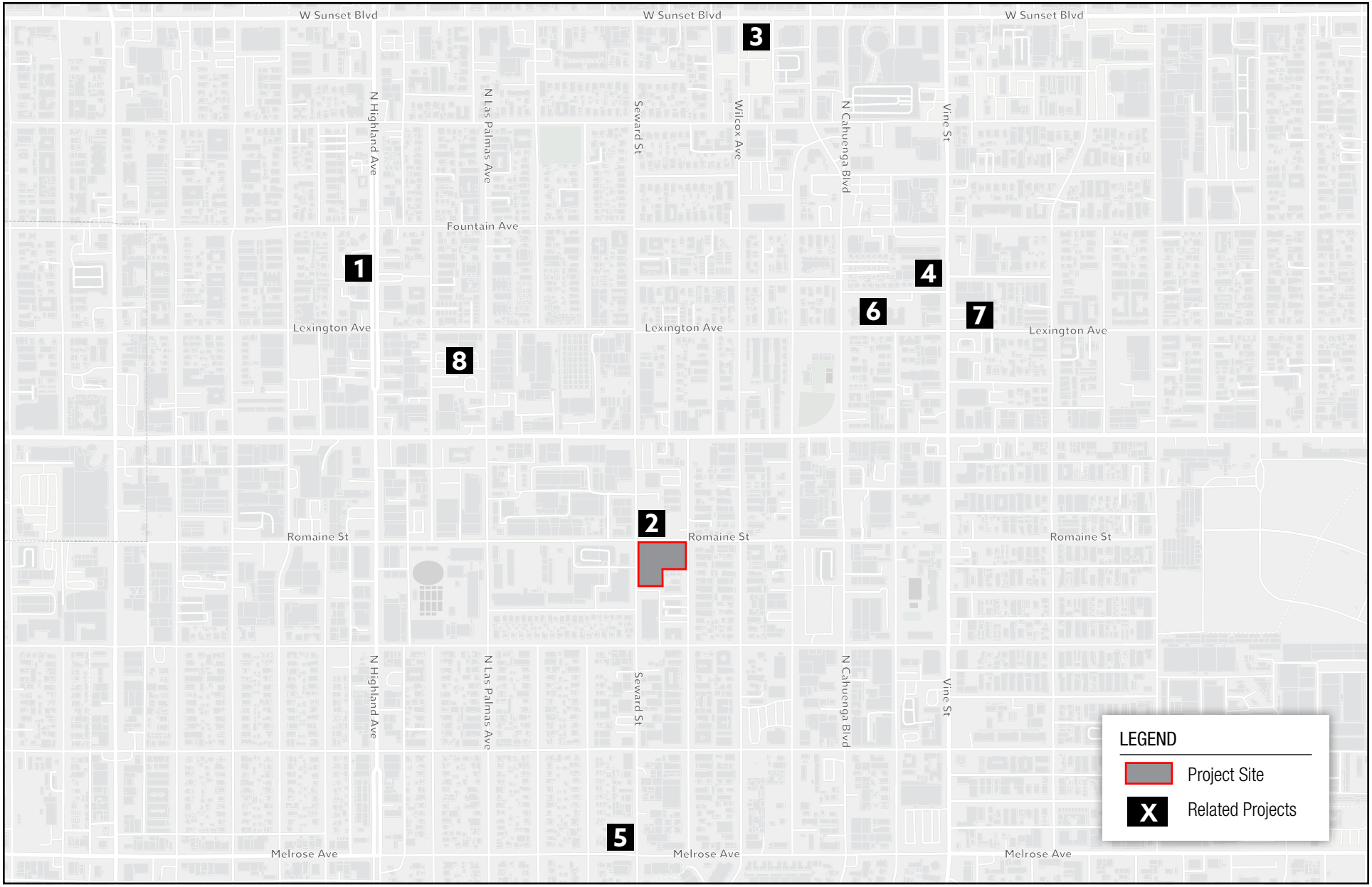
[166] State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.
[167] Ibid.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Based on the analyses presented in this IS/MND, with the incorporation of the mitigation measures identified in this IS/MND, the Project's environmental impacts would be less than significant. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.

Table 33: Related Projects List

Map No.	Project Name	Address	Description
1	1233 N Highland Ave Mixed Use	1233 N .Highland Ave.	72 Apartments (In Construction 2022)
2	1000 Seward Mixed-Use Project	1000 N. Seward St.	136.2 ksf office, 2.2 ksf restaurant, 2.2 ksf retail
3	Sunset + Wilcox Mixed Use	6450 W. Sunset Bl.	431.032 ksf office, 12.386 ksf restaurant
4	Office and Commercial	1235 N. Vine St.	109,190 Sf Office, 7,960 sf Restaurant/retail
5	Melrose/Seward Creative Office	6101 W. Melrose Ave.	17,134 sf existing office to remain, 65,003 sf office new, 422 sf restaurant
6	Creative Offices	1200 N. Cahuenga Bl.	Commercial use: 75,362 sf creative offices, 500 sf retail
7	1200 Vine Mixed-Use Project	1200 N. Vine St.	135 Apartments, 18 affordable housing units, and 7 ksf restaurant
8	Office and Commercial	1149 N. Las Palmas Ave.	81,424 sf Office, 485 sf Retail
Source: LADOT September 26th, 2023			



SOURCE: ArcGIS, 2023

N.T.S.

FIGURE 9: Related Projects Map

956 SEWARD STREET PROJECT

Kimley»Horn