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

INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

Playa Vista Public Storage Redevelopment Project

Case Number: ENV-2024-116-MND

Project Location: 12681 W. Jefferson Boulevard, Los Angeles, CA, 90066

Community Plan Area: Palm – Mar Vista – Del Rey

Council District: 11— Park

Project Description: The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The Project is proposing to construct a new mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

APPLICANT:

Public Storage
701 Western Avenue
Glendale, CA 91201

May 2025

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1 INTRODUCTION

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

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

1.2 ORGANIZATION OF THE IS/MND

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

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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. Throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	**PLAYA VISTA PUBLIC STORAGE REDEVELOPMENT PROJECT**
ENVIRONMENTAL CASE NO.	ENV-2024-116-MND
RELATED CASES	CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

PROJECT LOCATION	**12681 W. JEFFERSON BOULEVARD, LOS ANGELES, CA 90066**
COMMUNITY PLAN AREA	PALMS – MAR VISTA – DEL REY
GENERAL PLAN DESIGNATION	LIGHT INDUSTRIAL
ZONING	M2-1
COUNCIL DISTRICT	11 – TRACI PARK

LEAD CITY AGENCY	**City of Los Angeles Department of City Planning**
STAFF CONTACT	KENTON TRINH
ADDRESS	200 N. SPRING STREET, ROOM 763
PHONE NUMBER	213-482-7092
EMAIL	KENTON.TRINH@LACITY.ORG

APPLICANT	**PUBLIC STORAGE**
ADDRESS	701 WESTERN AVENUE, GLENDALE, CA 91201
PHONE NUMBER	818-244-8080

PROJECT DESCRIPTION

The Project would involve the construction of a new mixed-use building with approximately 82,324 square feet of floor area including approximately 3,959 square feet of ground-floor retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area.[1]

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

ENVIRONMENTAL SETTING

The Project Site is located at 12681 W. Jefferson Boulevard, in the Playa Del Rey community (Assessor Parcel Numbers (APNs) are 4211-009-025, 4211-009-028, and 4211-005-017). The existing land use designation for the Project Site in the Palms – Mar Vista – Del Rey Community Plan is Light Industrial, and the existing zoning for the Site is M2-1. The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The western approximately 25,000 square feet of the Project Site is currently vacant and undeveloped.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

[1] The proposed gross floor area is approximately 4,138 square feet of retail uses and 80,614 square feet of mini-warehouse uses.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Kenton Trinh	City Planner
PRINTED NAME	**TITLE**
Kenton Trinh	5-14-25
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Applicant, Public Storage, proposes the construction of a new three-story plus basement mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses with a proposed maximum building height of 44 feet, three inches, on the Project Site (Assessor Parcel Numbers (APNs) 4211-009-025, 4211-009-028, and 4211-005-017). The Project Site is currently partially developed with an existing approximately 216,584 square foot mini-warehouse building that contains four stories, which would remain as part of the Project. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area, with a floor area ratio (FAR) of 2.1:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

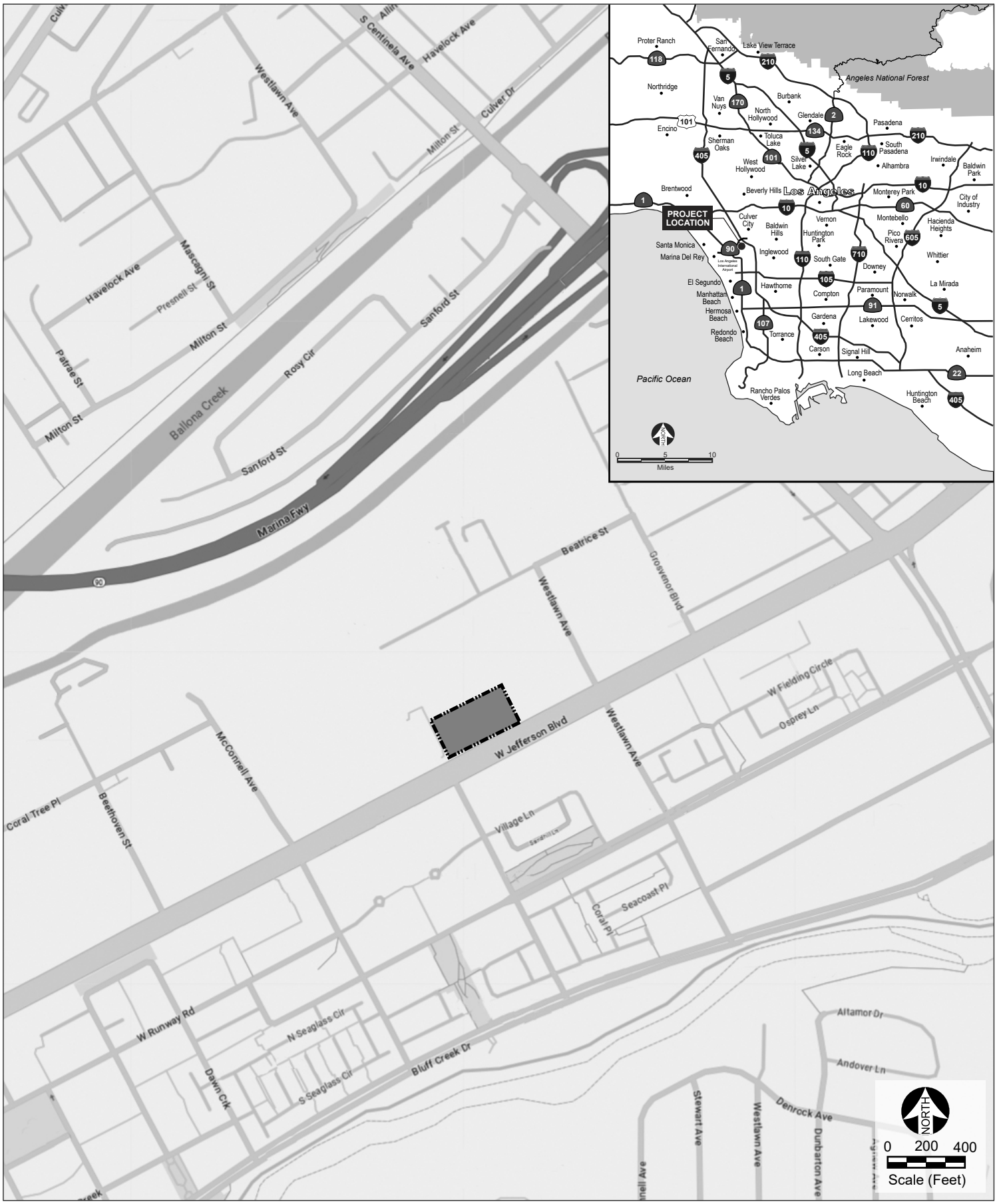
The Project Site is located at 12681 West Jefferson Boulevard, in the Playa Del Rey community of the City of Los Angeles, and is accessible via Jefferson Boulevard. The Project Site is within the M2-1 zone and is designated Light Industrial in the Palms – Mar Vista – Del Rey Community Plan Area (Community Plan). Regional vehicular access to the Project Site is provided by the I-405 San Diego Freeway and the SR-90 Marina Freeway. Major arterials serving the Project Site include Jefferson Boulevard and Centinela Avenue. Local-serving streets surrounding the Project Site include Campus Center Drive, McConnell Avenue, Village Drive, and Westlawn Avenue.

3.2.2 Existing Conditions

The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The western 25,000 square feet of the Project Site is currently vacant and undeveloped.

3.2.3 Surrounding Land Uses

The Project Site is bounded by Jefferson Boulevard to the south; commercial and industrial uses in the M2-1 zone to the east; commercial uses in the M2-1 zone to the west; and commercial, industrial, and residential uses in the M2-1 and [Q]C2-2 zones to the north. A map showing the surrounding land uses is provided in Figure 3-3.



Legend

Project Site

Source: Google Maps 2024.

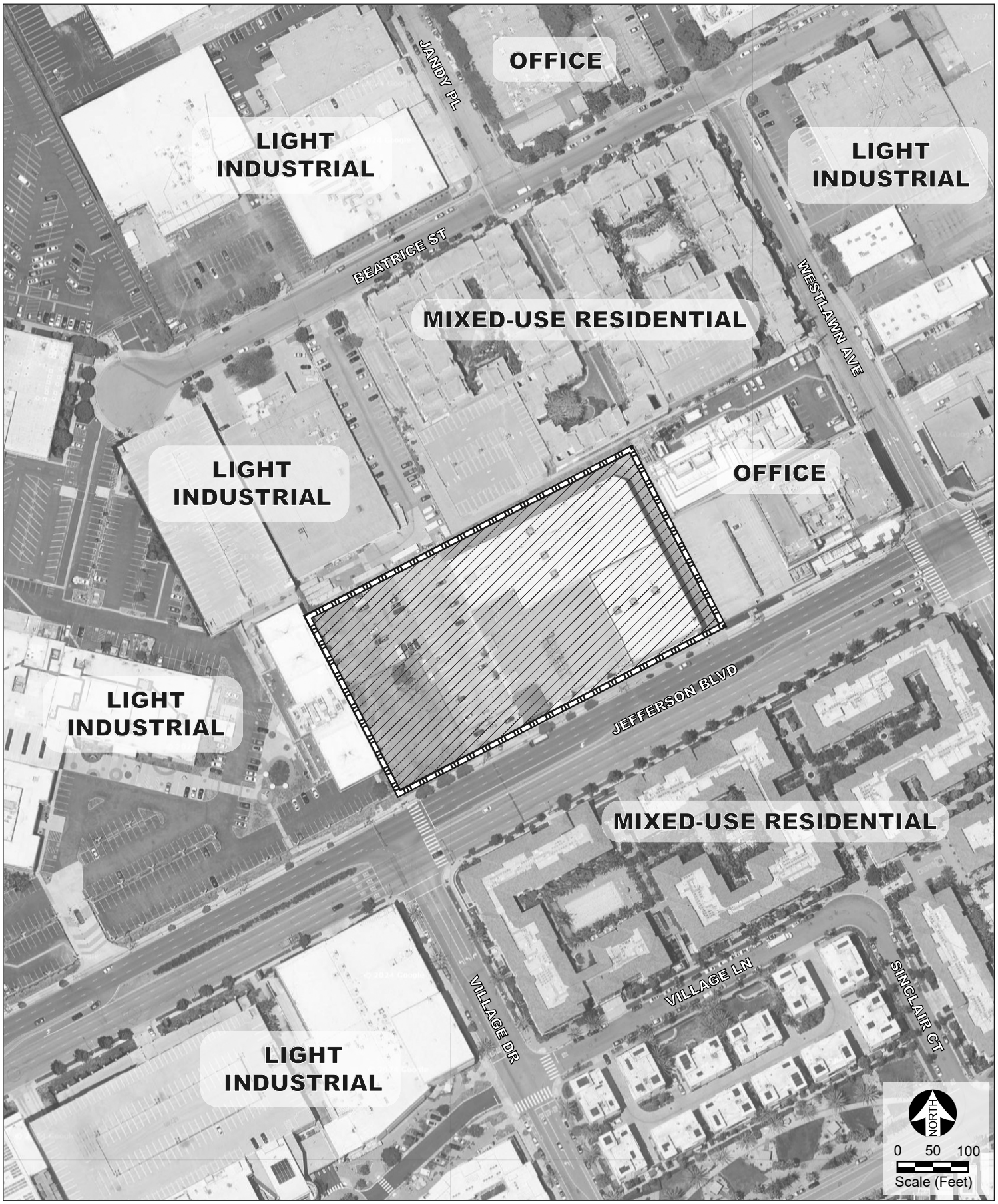
Figure 3-1
Regional Location Map

Legend

Project Site

Source: Google Maps 2024.

Figure 3-2
Aerial Map



Legend

Project Site

Source: Google Maps 2024.

Figure 3-3
Surrounding Land Uses

3.2.4 Existing Transit Service

Four bus lines currently serve the vicinity of the Project Site. One bus line (Line 110) is operated by the Los Angeles County Metropolitan Transportation Authority (Metro), one bus line (Commuter Express (CE) 437B) is operated by the Los Angeles Department of Transportation (LADOT), one bus line (Line 4) is operated by the Culver City Bus (CC), and one bus line (Daily Shuttle) is operated by Playa Vista (PV). Bus stops are located at the corners of the intersection of McConnell Avenue/Jefferson Boulevard that serve Metro 110, LADOT CE437B, and CC Line 4. Bus stops are also located at the corners of the intersection of Village Drive/Millennium Drive that serve PV Daily Shuttle.

3.3 DESCRIPTION OF THE PROJECT

3.3.1 Project Overview

The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The Project is proposing to construct a new mixed-use building with 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches in height. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area. The site plan is provided in Figure 3-4, floor plans are provided in Figures 3-5 through 3-10, elevations are provided in Figures 3-11 and 3-12, the landscape plan is provided in Figure 3-13, and renderings are provided in Figures 3-14 and 3-15.

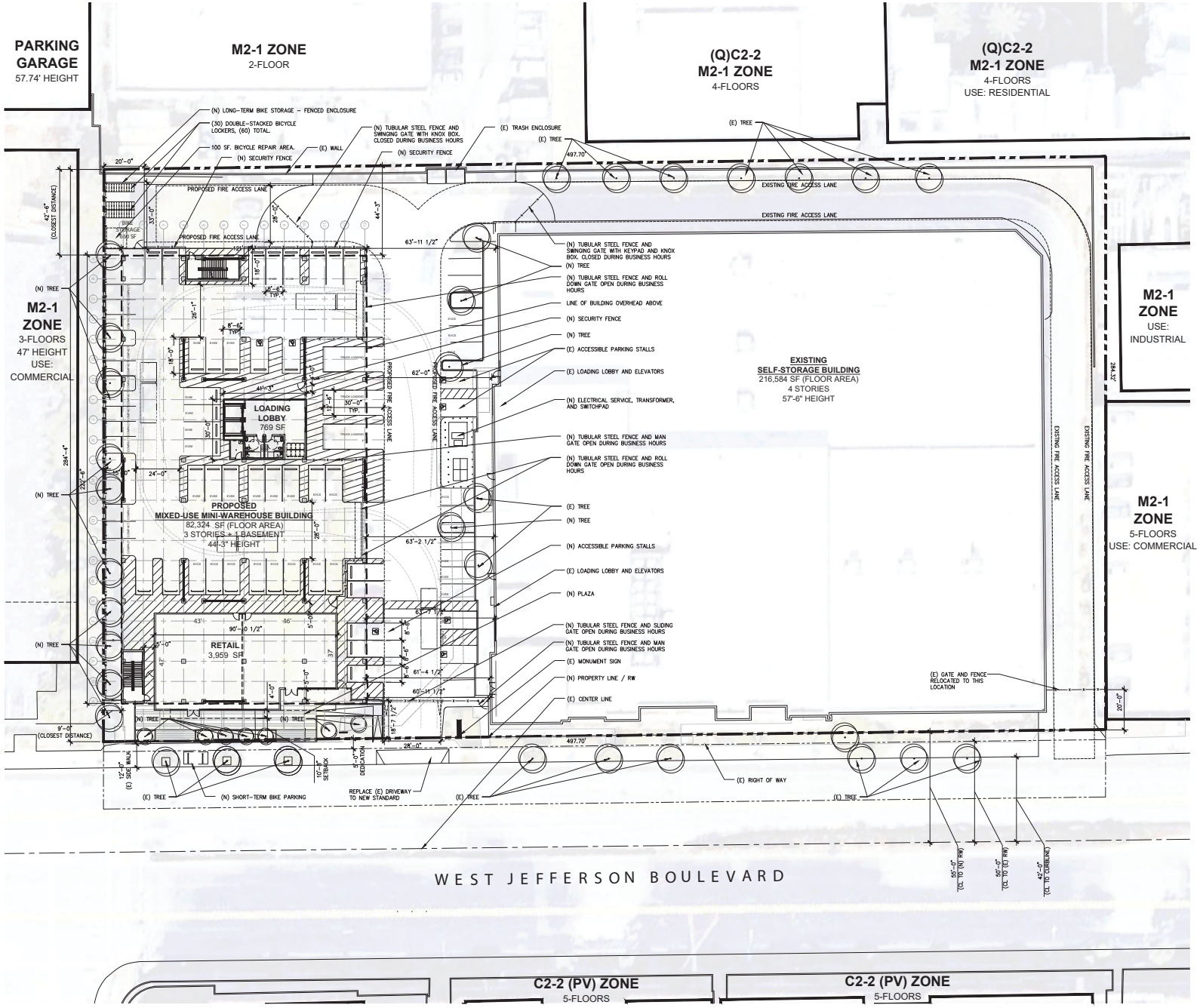


Figure 3-4
Site Plan

Source: Ware Malcomb Architecture, 2025.

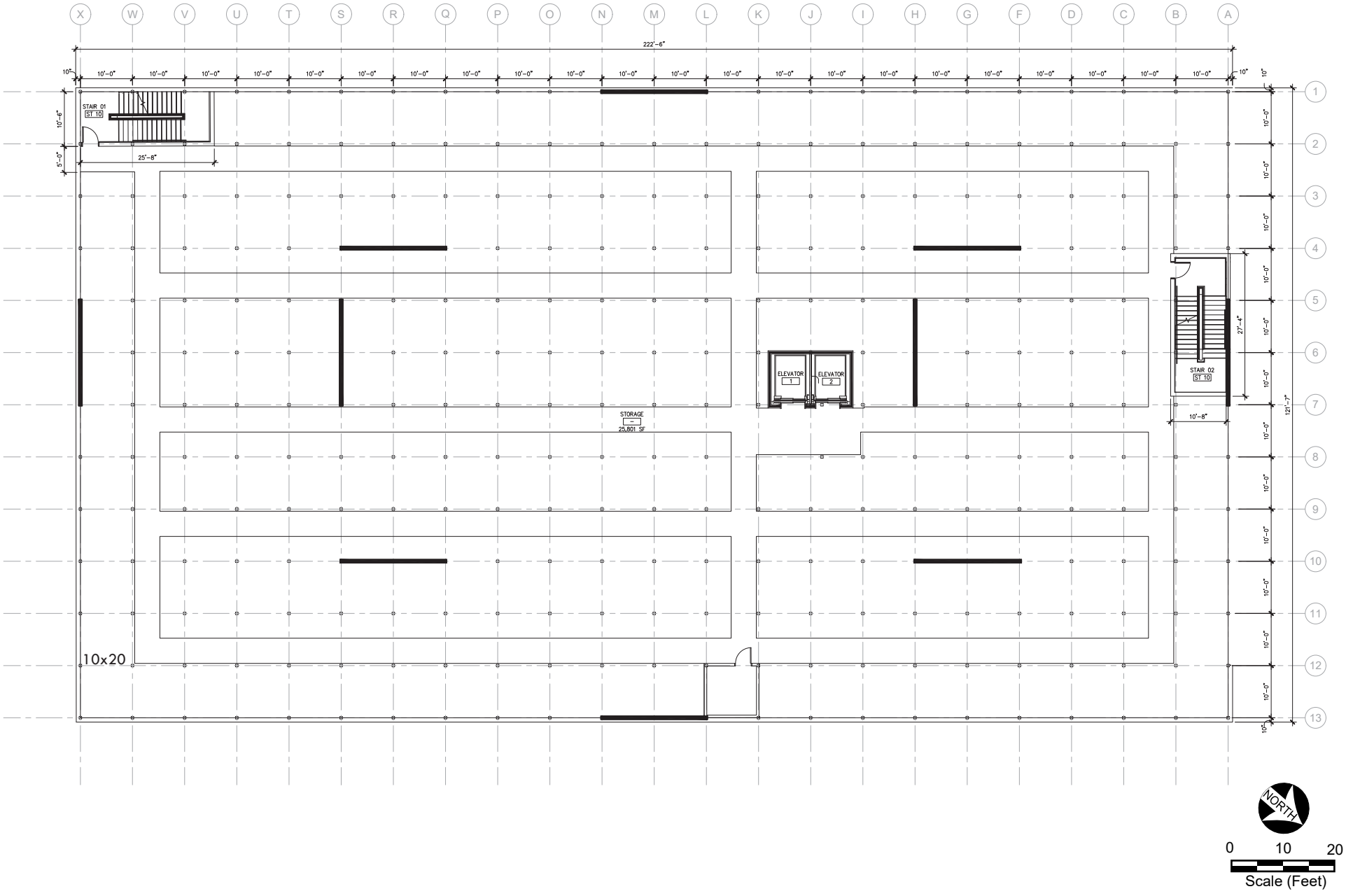


Figure 3-5
Basement Floor Plan

Source: Ware Malcomb Architecture, 2024.

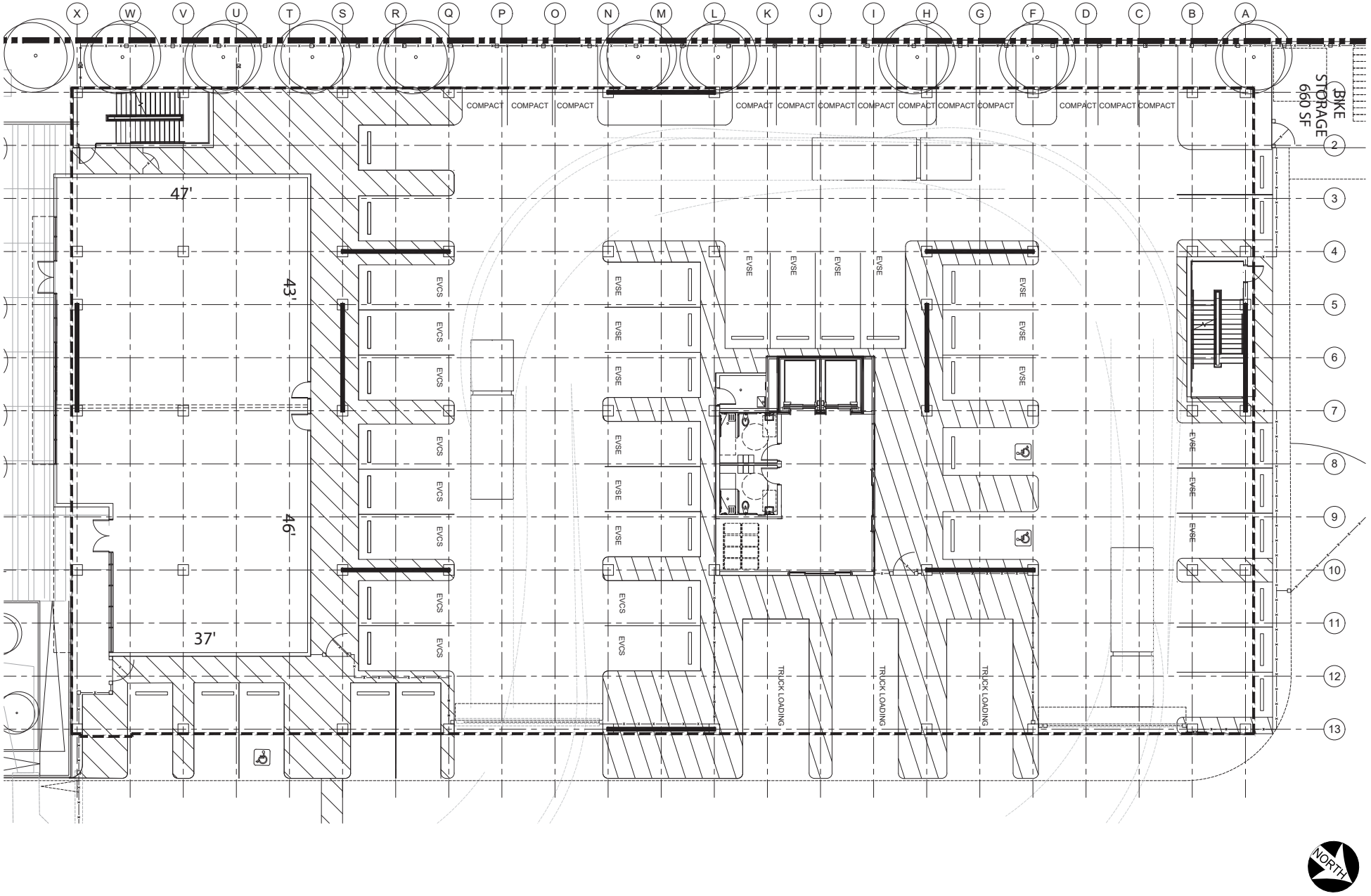


Figure 3-6
Ground Floor Plan

Source: Ware Malcomb Architecture, 2025.

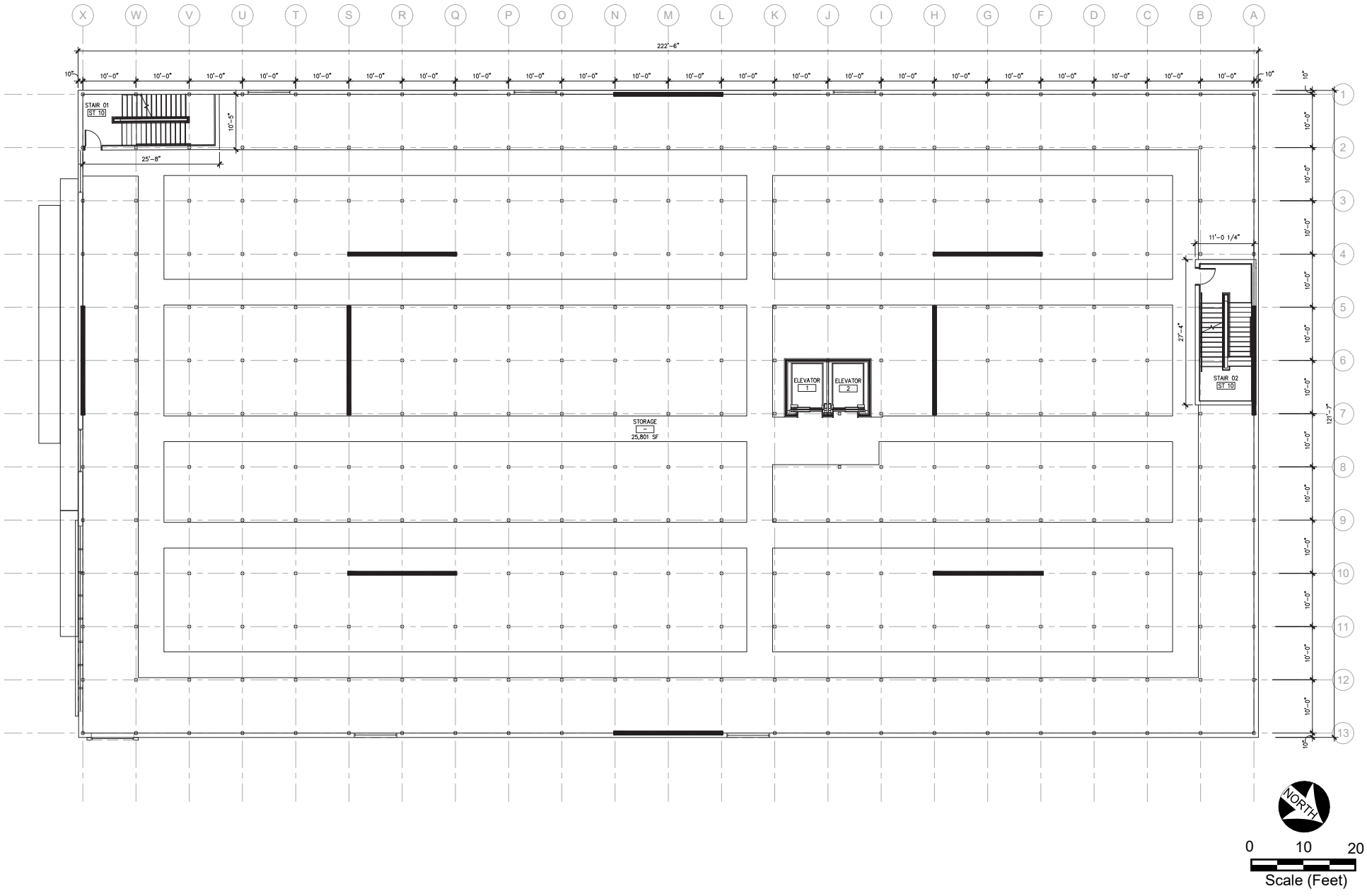


Figure 3-7
Level 2 Floor Plan

Source: Ware Malcomb Architecture, 2024.

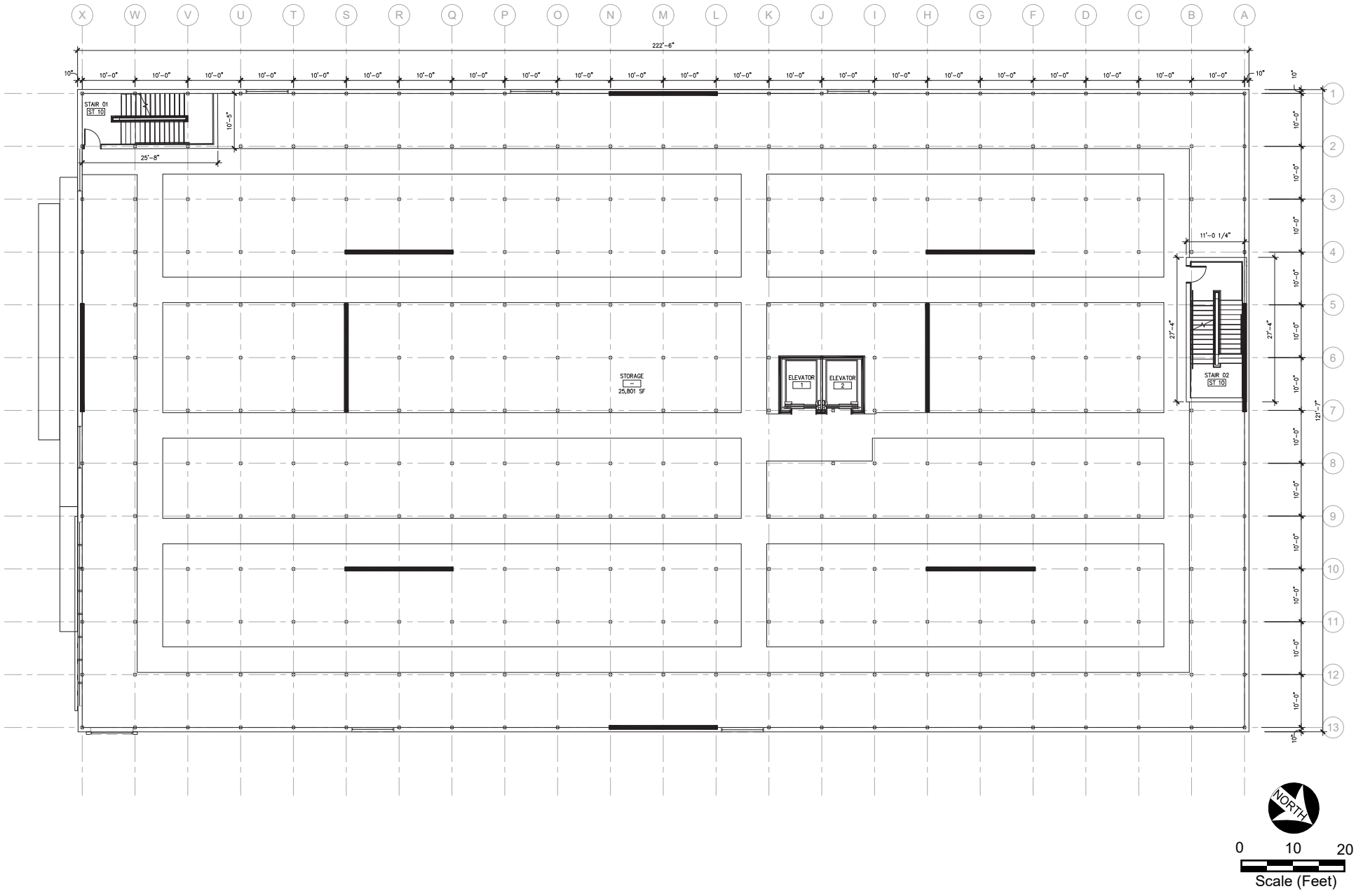


Figure 3-8
Level 3 Floor Plan

Source: Ware Malcomb Architecture, 2024.

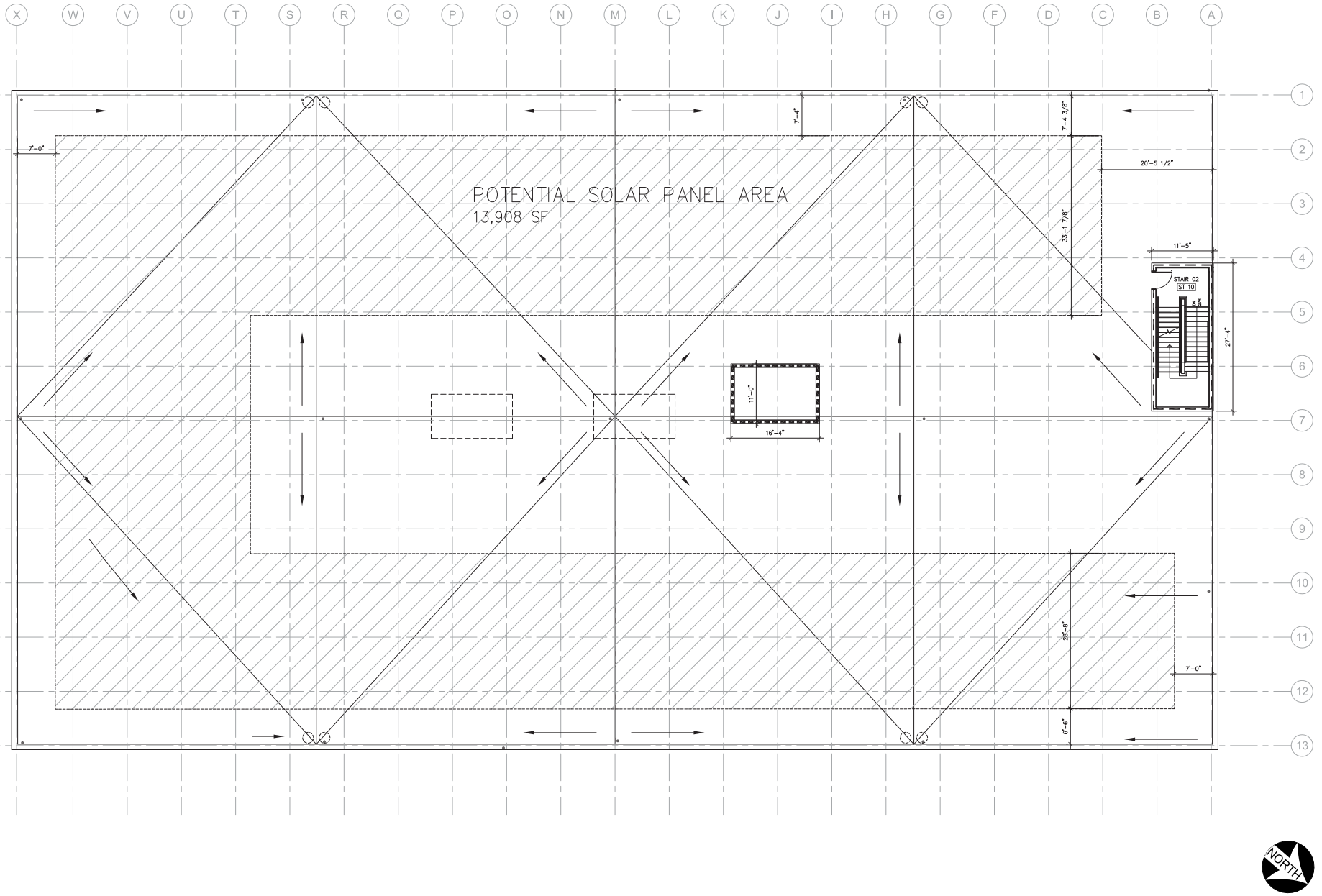


Figure 3-9
Roof Lower Level Plan

Source: Ware Malcomb Architecture, 2024.

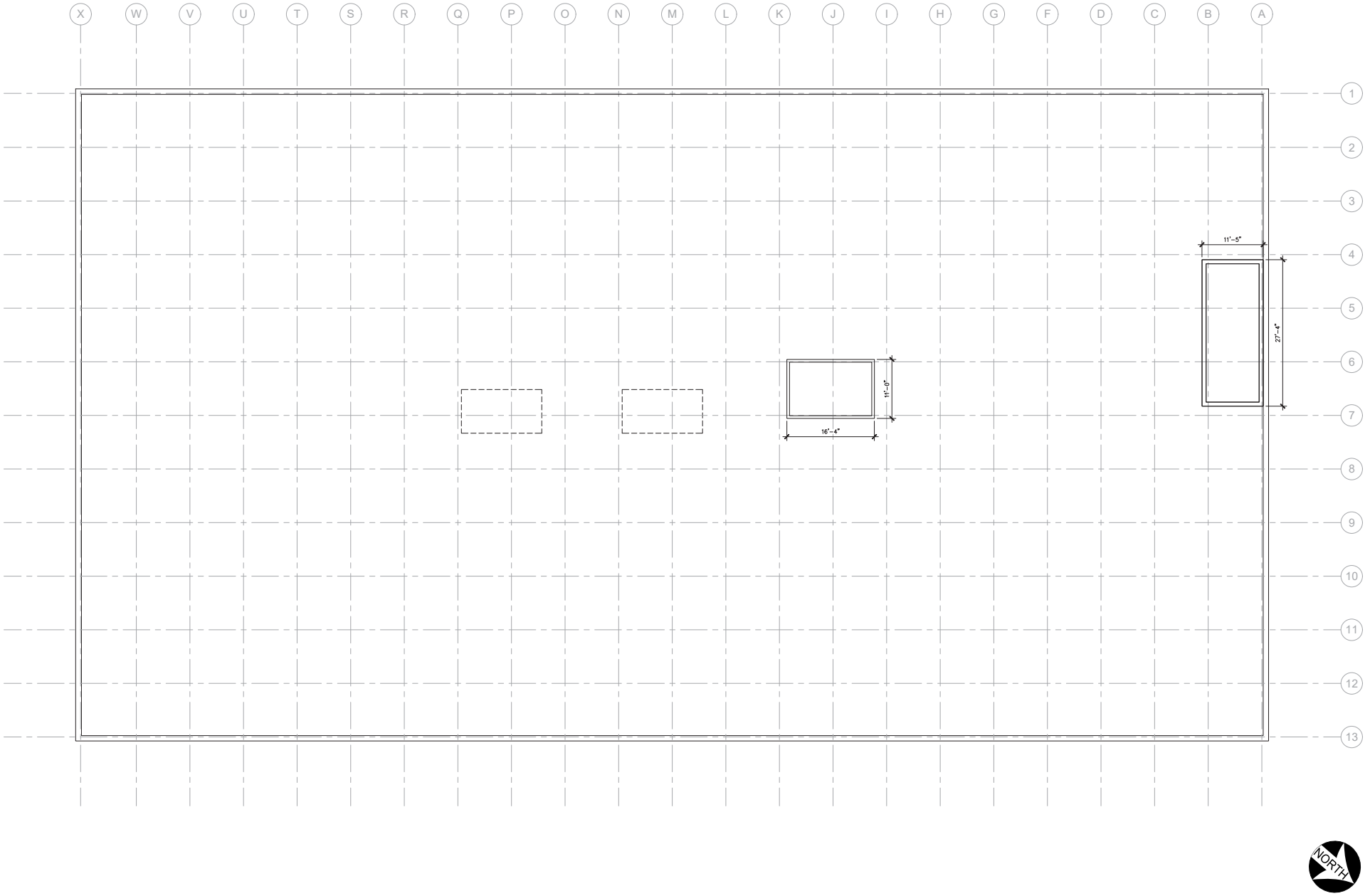


Figure 3-10
Roof Upper Level Plan

Source: Ware Malcomb Architecture, 2024.

SOUTH ELEVATION

WEST ELEVATION

KEYNOTES

1 MORIN METAL PANEL SYSTEM
PAINTED: PUBLIC STORAGE ORANGE

2 CLEAR ANODIZED STOREFRONT SYSTEM

3 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: WINTER MOOD, PPG14-16

4 METAL COMPOSITE PANEL
ALUCOBOND, PURE WHITE - RVW

5 SITECAST CONCRETE

6 CONCRETE MASONRY WALL
ANGELUS BLOCK, PLACER CREEK

7 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: PUBLIC STORAGE ORANGE

8 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: ROLLER COASTER, PPG1008-5

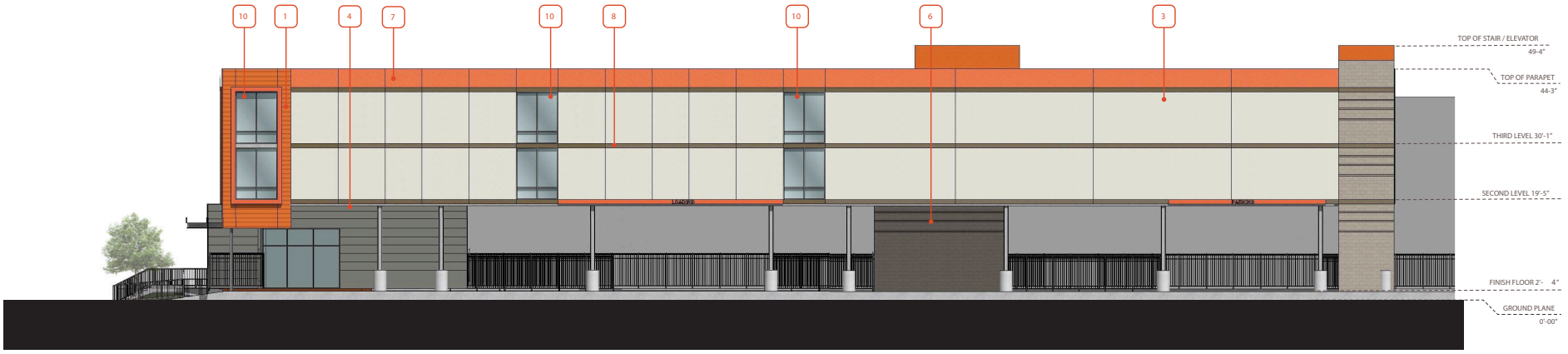
9 TENANT SIGNAGE

10 SPANDREL GLASS

Source: Ware Malcomb Architecture, 2024.

Figure 3-11
South and West Elevations

NORTH ELEVATION



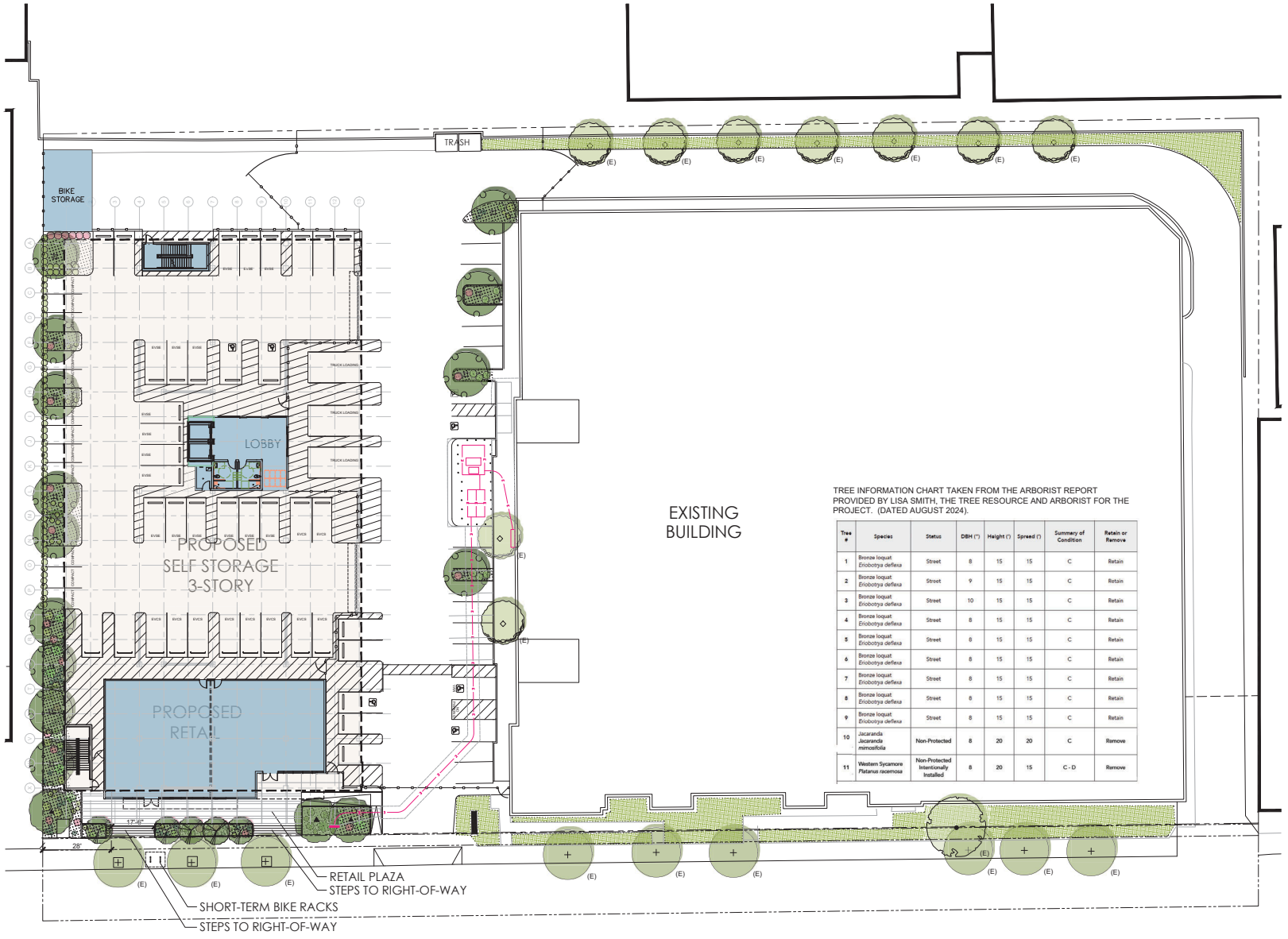
EAST ELEVATION

KEYNOTES

1	MORIN METAL PANEL SYSTEM PAINTED: PUBLIC STORAGE ORANGE	5	SITECAST CONCRETE	9	TENANT SIGNAGE
2	CLEAR ANODIZED STOREFRONT SYSTEM	6	CONCRETE MASONRY WALL ANGELUS BLOCK, PLACER CREEK	10	SPANDREL GLASS
3	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: WINTER MOOD, PPG14-16	7	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: PUBLIC STORAGE ORANGE		
4	METAL COMPOSITE PANEL ALUCOBOND, PURE WHITE - RVW	8	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: ROLLER COASTER, PPG1008-5		

Source: Ware Malcomb Architecture, 2024.

Figure 3-12
North and East Elevations



TREE INFORMATION CHART TAKEN FROM THE ARBORIST REPORT PROVIDED BY LISA SMITH, THE TREE RESOURCE AND ARBORIST FOR THE PROJECT. (DATED AUGUST 2024).

Tree #	Species	Status	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
2	Bronze loquat *Eriobotrya deflexa*	Street	9	15	15	C	Retain
3	Bronze loquat *Eriobotrya deflexa*	Street	10	15	15	C	Retain
4	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
5	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
6	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
7	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
8	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
9	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
10	Jacaranda *Jacaranda mimosifolia*	Non-Protected	8	20	20	C	Remove
11	Western Sycamore *Platanus racemosa*	Non-Protected Intentionally Installed	8	20	15	C - D	Remove

PRELIMINARY PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED TREES		
	LAGERSTROEMIA INDICA / CRAPE MYRTLE	36" BOX STANDARD FORM
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX STANDARD FORM
	TRISTANIA CONFERTA / BRISBANE BOX OR ELAEOCARPUS DECIPIENS / JAPANESE BLUEBERRY	24" BOX STANDARD FORM

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED SHRUBS AND GROUNDCOVER		
	AGAVE BLUE GLOW / BLUE GLOW AGAVE	1 GAL / 30" O.C.
	AGAVE DESMETTIANA / SMOOTH AGAVE	1 GAL / 42" O.C.
	ALOE ARBORESCENS / CANDELABRA ALOE	1 GAL / 42" O.C.
	BOUGAINVILLEA 'BARBARA KARST' / BARBARA KARST BOUGAINVILLEA	5 GAL / 42" O.C.
	BULBINE F. 'TINY TANGERINE' / TINY TANGERINE BULBINE	1 GAL / 30" O.C.
	CARISSA 'GREEN CARPET' / GREEN CARPET NATAL PLUM	1 GAL / 36" O.C.
	DIANELLA T. 'SILVER STREAK' / SILVER STREAK FLAX LILY	1 GAL / 36" O.C.
	MUHLENBERGIA CAPILLARIS / PINK MUHLY	1 GAL / 24" O.C.
	PHORMIUM ATROPURPUREUM / NEW ZEALAND FLAX	5 GAL / 36" O.C.
	YUCCA 'GOLDEN SWORD' / GOLDEN SWORD YUCCA	1 GAL / 30" O.C.

(ADDITIONAL PLANT MATERIAL MAY BE ADDED TO THE ABOVE LIST DURING THE PRELIMINARY PHASE OR CONSTRUCTION DOCUMENT PHASE TO REFINE PROPOSED PLANT PALETTE)

EXISTING PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	COMMENTS
EXISTING TREES		
(E)	GINKGO BILOBA / GINKGO TREE	EXISTING TREE
(E)	PARKINSONIA ACULEATA / MEXICAN PALO VERDE	EXISTING TREE
(E)	ERIOBOTRYA DEFLEXA / BRONZE LOQUAT	EXISTING STREET TREE

PROTECTED TREES WITHIN THE CITY OF LOS ANGELES:
- *QUERCUS LOBATA* / VALLEY OAK
- *QUERCUS AGRIFOLIA* / CALIFORNIA LIVE OAK

OR

-ANY OTHER TREE OF THE OAK GENUS INDIGENOUS TO SOUTHERN CALIFORNIA BUT EXCLUDING *QUERCUS BERBERIDIFOLIA* / SCRUB OAK
- *JUGLANS CALIFORNICA* / CALIFORNIA BLACK WALNUT
- *PLATANUS RACEMOSA* / WESTERN SYCAMORE
- *UMBELLULARIA CALIFORNICA* / CALIFORNIA BAY LAUREL

PROTECTED SHRUBS:
- *SAMBUCUS MEXICANA* / MEXICAN ELDERBERRY
- *HETEROMELES ARBUTIFOLIA* / TOYON

NOTE: PROTECTED TREES AND SHRUBS DO NOT OCCUR ON THE PROJECT SITE.

2926.4 SF OF PROPOSED LANDSCAPE AREA FOR PROPOSED BUILDING

Colleen M. Nolan
Landscape Architect, #5439
cnolan@cox.net
13355 Silverado Court, Corona 92883
714.743.7915 cell

SCALE: 1/16" = 1'-0"
0 16' 32' 64'

NORTH

Source: Ware Malcomb Architecture, 2025.

Figure 3-13
Preliminary Landscape Plan

Source: Ware Malcomb Architecture, 2024.

Figure 3-14
Rendering 1

Source: Ware Malcomb Architecture, 2024.

Figure 3-15
Rendering 2

3.3.2 Vehicle and Pedestrian Access

A driveway located along the north side of Jefferson Boulevard currently provides vehicular access (inbound and outbound) to the existing building. The same driveway would also provide access to the Project.

Jefferson Boulevard would provide the main pedestrian access to the Project Site. Sidewalks are available on both sides of Jefferson Boulevard adjacent to and in the vicinity of the Project Site. The existing sidewalk/parkway along Jefferson Boulevard adjacent to the Project Site is approximately 12 feet wide. Pedestrian crosswalks adjacent to the Project Site are available at the nearby intersection of Village Drive/Jefferson Boulevard and Westlawn Avenue/Jefferson Boulevard.

3.3.3 Vehicle and Bicycle Parking

The Project would provide a total of 70 vehicle parking spaces and 64 bicycle parking spaces (including 32 long-term spaces and 32 short-term spaces).

3.3.4 Trees

As discussed in greater detail in Section 4 of this IS/MND, a tree report was prepared by a certified arborist in accordance with the City's Tree Preservation Ordinance No. 186,873, and this report is included as Appendix B to this IS/MND. The tree report identified two on-site trees as well as nine street trees adjacent to the Project Site.[1] Of these trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of the two non-protected private property trees, while the street trees would be preserved.

3.3.5 Sustainability Features

The Project would comply with the California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). In addition, the Project would include the following sustainability features:

- Interior lights in the self-storage building, except emergency lights, will be operated via motion detector so that they will be off most of the time.
- The self-storage building will be climate-controlled and will only be heated if the interior temperatures reach approximately 55 degrees and cooled only when interior temperatures reach approximately 80 degrees.
- Solar panels to support the power needs of the building.

[1] There was one additional Bronze Loquat Street Tree located in front of the Project Site, but it declined and died and was then removed by the City.

3.3.6 Construction Assumptions

Construction of the Project is anticipated to last approximately 12 months, with the Project becoming operational in 2028. Table 3-1 summarizes the estimated construction schedule. As shown in Table 3-1, construction of the Project would result in approximately 13,541 cubic yards of soil export from the Project Site to a landfill.

Table 3-1
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1 (2 weeks)	Removal of approximately 28,500 square feet of asphalt/concrete parking lot hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 1 (2 weeks)	Grubbing and removal of trees, plants, landscaping, and weeds.
Grading	Month 2	Approximately 13,541 cubic yards of soil (including swell factors for topsoil and dry clay) hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Trenching	Months 3-5	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-12	Footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 7	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 11-12	Application of interior and exterior coatings and sealants.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study / Mitigated Negative Declaration analyzes impacts associated with the Project and provides 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:

- Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.6, a General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site;

- Pursuant to LAMC Section 12.32, a Height District Change to Height District 2, which would allow for the Project Site to be developed with approximately 298,908 square feet of floor area, with a corresponding FAR of 2.1:1;

- Pursuant to LAMC Sections 12.24.W.50 and 12.24.S, a Conditional Use Permit to allow for storage of household goods and to decrease Code parking requirements by 20 percent;

- Pursuant to LAMC Section 12.28, a Zoning Administrator Adjustment for building height to increase building height by up to 20 percent; and

- Pursuant to LAMC Section 16.05, a Site Plan Review.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, haul route permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- None.

3.6 RELATED PROJECTS

In this IS/MND, cumulative impact analyses are provided for each environmental issue discussed in Section 4 (Environmental Impact Analysis) and can be found in each respective subsection of Section 4. There are four related projects identified by the City of Los Angeles within 1,000 feet of the Project Site (shown in Figure 3-16).[2]

1. 12777 Jefferson Boulevard; 49,950 square foot office expansion; approximately 670 feet from the Project Site.[3]

2. 5405 Jandy Place; 93,950 square foot office building; approximately 750 feet from the Project Site.

3. 12555 Jefferson Boulevard; adaptive reuse of commercial building; approximately 860 feet from the Project Site.

4. 12575 Beatrice Street; 250,000 square foot office building; approximately 880 feet from the Project Site.

[2] City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, June 2024.

[3] While this project was included on the list of related projects, it has already been built. Nevertheless, to provide a conservative analysis, it has still been included as a related project for purposes of the cumulative analyses contained in this IS/MND.

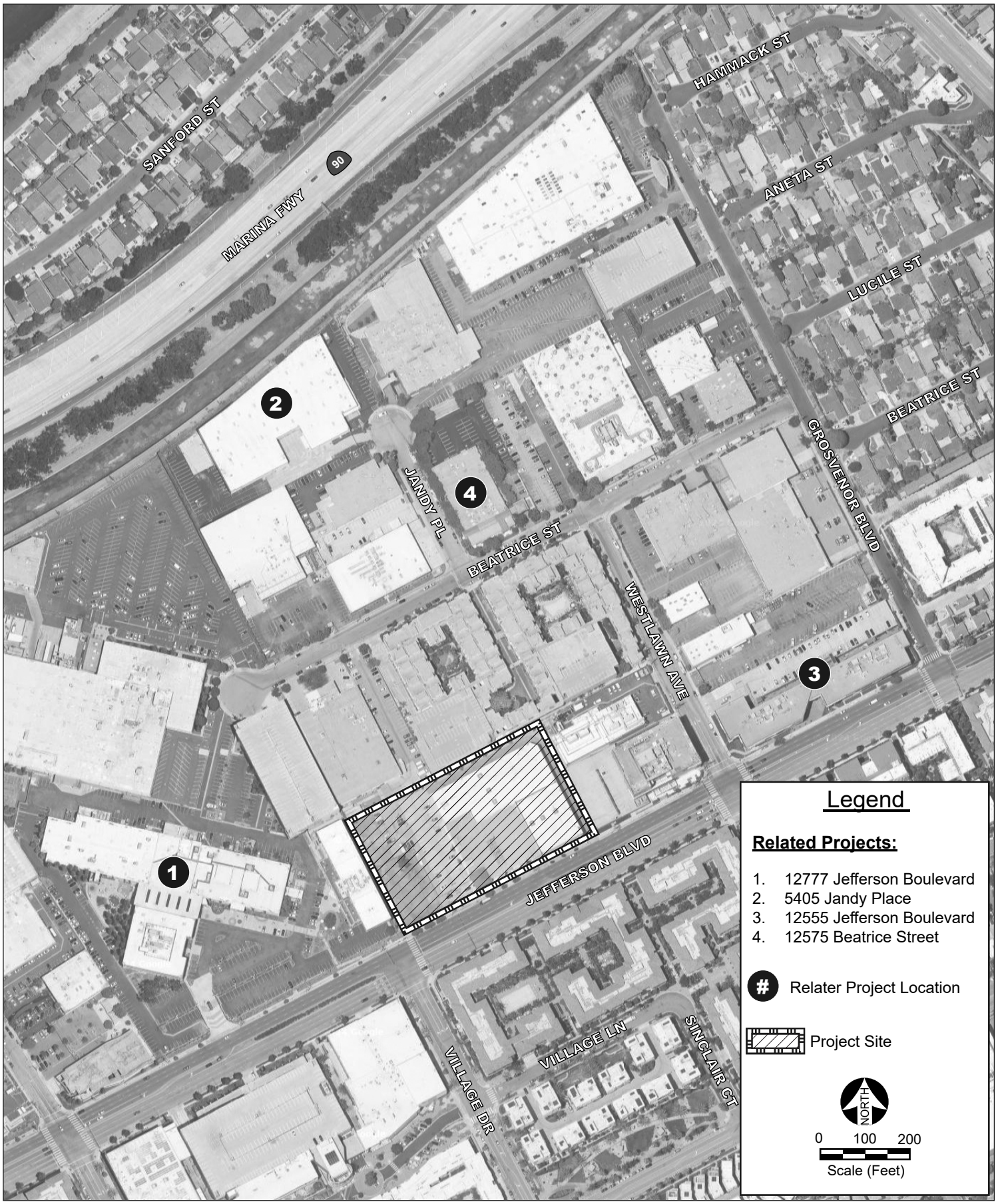


Figure 3-16
Related Projects Location Map

Source: Google Maps 2024.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?

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

story mini-warehouse building, which would remain as part of the Project, and the Project would construct a three-story mini-warehouse building that would be of similar scale and height as the existing building as well as other surrounding commercial, industrial, and residential buildings. As such, the Project would not result in a substantial adverse effect on a scenic vista, and no impact would occur.

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

No Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.[1] The nearest state designated scenic highway is Topanga Canyon Boulevard (State Route 27), which is approximately 14 miles from the Project Site. Therefore, no impact would occur.

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

Less Than Significant Impact. The Project Site is located within an urbanized area, and thus, the following analysis will focus on whether the Project will conflict with any applicable zoning and/or other regulations governing scenic quality. As discussed below under "Land Use," the Project requests a General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site and a Height District Change to Height District 2. However, these requested changes relate to the allowable floor area ratio (FAR) of the Project Site and are not related to governing scenic quality. In addition, the Project would not conflict with existing zoning and other regulations governing scenic quality for the Project Site. The Project Site is located in the Palms – Mar Vista – Del Rey Community Plan, which contains one goal (Goal 18) related to governing scenic quality, to protect views to the ocean and scenic coastal areas. However, as discussed above, the Project Site is located in an urbanized portion of Los Angeles and is topographically flat and is not located near the ocean or scenic coastal areas. Therefore, the Project would not conflict with the Palms – Mar Vista – Del Rey Community Plan goal governing scenic quality. Streets in the Project area are densely populated with commercial, industrial, and residential uses. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels, and there are no views of the ocean available from the Project Site or general Project area. There are no designated scenic vistas at the Project site. The Palms – Mar Vista – Del Rey Community Plan does not contain any other policies with regard to scenic quality, and the Project Site is not subject to other regulations governing scenic quality. Therefore, the Project would not conflict with any

[1] California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 23, 2024.

applicable zoning or other regulations governing scenic quality, and this impact would be less than significant.

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

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

Artificial Light

An adverse impact would occur if a project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, the existing uses on the Project Site (mini-warehouse, as well as the associated surface parking lot) currently provide a moderate amount of illumination at the Project Site. The Project would involve construction of a new mixed-use mini-warehouse building, which would include indoor building illumination as well as lighting for security. The interior lights in the new mini-warehouse portion of the building, except emergency lights, would be operated via motion detector so that they will be off most of the time. In addition, any exterior building lighting would be designed to confine illumination to the Project Site and would not result in any additional illumination at any light sensitive receptor. Therefore, lighting from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of artificial light, and this impact would be less than significant.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets or in surface parking lots, exterior building windows, and surfaces of brightly painted buildings. Glare currently exists at the Project Site from windows of the existing building as well as automobiles parked in the surface parking lot. The Project would maintain these existing sources of glare and the proposed use would provide a similar amount of glare as currently exists at the Project Site (from the windows on the proposed mini-warehouse building as well as automobiles parked in the proposed surface parking). In addition, all exterior

windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, glare from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of glare, and this impact would be less than significant.

Cumulative Impacts

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

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

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned M2-1 and the General Plan land use designation for the Project Site is Light Industrial. The Project Site is currently partially developed with a mini-warehouse building and an associated surface parking lot. The Project Site is located in a developed and urbanized area and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[2] Therefore, no impact would occur.

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

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

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

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

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

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

[2] State of California Department of Conservation, Farmland Mapping and Monitoring Program, https://maps.conservation.ca.gov/DLRP/CIFF/, February 21, 2024.

[3] State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, February 21, 2024.

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

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

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

Cumulative Impacts

As described above, the Project would not result in any impacts related to agricultural and forestry resources, and the Project area is developed with urban land uses. Therefore, the Project could not combine with other projects to result in cumulative impacts, and no cumulative impacts would occur with respect to agricultural and forestry resources.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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 in this section is based on the following, which is included in Appendix A of this IS/MND:

A Air Quality Technical Modeling, DKA Planning, June 2024.

Regulatory Framework

Federal

Clean Air Act

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

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the

environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

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

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

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment

Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment
Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed October 6, 2023.					

State

California Clean Air Act

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

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The State standards and attainment/non-attainment are also shown in Table III-1, above.

California Air Toxics Program

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

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

Air Quality and Land Use Handbook

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

Regional

South Coast Air Quality Management District

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

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

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

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to

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

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

- Rule 431.2 Sulfur Content of Liquid Fuels: This rule would require use of low-sulfur fuel in construction equipment.

- Rule 1113 Architectural Coatings: This rule limits the VOC content of architectural coatings.

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

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

2022 Air Quality Management Plan

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

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. As of April 4, 2024, the 2024-2050 RTP/SCS (Connect SoCal), is SCAG's latest long-range plan, continuing to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledging how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2024-2050 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2024-2050 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Corridors (HQTCs) and aims to enhance and build out the region's transit network. HQTCs are a cornerstone of land use planning best practice in the SCAG region, and studies have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

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

Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

Goal 4: 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.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

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

pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[5,6]

Carbon Monoxide – CO

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

Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide – SO_2

[5] USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

[6] SCAQMD, Final 2022 Air Quality Management Plan, December 2, 2022.

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

Particulate Matter (PM_{10} and $PM_{2.5}$)

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

Lead – Pb

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

Toxic Air Contaminants

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

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

cancer risk from vehicle traffic.[7] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[8] In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[9]

Volatile Organic Compounds

Volatile organic compounds (VOCs) are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_X, CO, SO_2) and contribute to the formation of photochemical smog.

Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Table III-1, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas (“SRAs”) throughout the Basin. The Project is located in SCAQMD’s Southwest Coastal LA County receptor area. Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2020 through 2022. As shown, the one-hour State standard for O_3 was exceeded two times during this three-year period. The federal standard was exceeded three times in that same period. In addition, the daily State standard for PM_{10} was exceeded 33 times, all in

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

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

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

2022. The daily federal standard for $PM_{2.5}$ was exceeded four times. CO and NO_2 levels did not exceed the CAAQS from 2020 to 2022 for 1-hour (and 8-hour for CO).

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2020	2021	2022
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.117	0.086	0.108
Days > 0.09 ppm (State 1-hour standard)	1	0	1
Days > 0.070 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide (CO_2)			
Maximum 1-hour Concentration (ppm)	1.6	2.6	N/A
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.3	1.9	N/A
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0597	0.0590	0.0581
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration ($\mu g/m^3$)	43	48	128
Days > 50 $\mu g/m^3$ (State 24-hour standard)	0	0	33
$PM_{2.5}$			
Maximum 24-hour Concentration ($\mu g/m^3$)	28.1	42.9	33.7
Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	0	4	0
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	6.0	5.9	28.8
Days > 0.04 ppm (State 24-hour standard)	0	0	0

ppm = parts by volume per million of air.
$\mu g/m^3$ = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Southwest Coastal LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed February 2, 2024. Where data from this location is not available, the highest measurements from South Coastal LA County areas 1,2, and 4.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities.

The Project Site is located on a major residential and commercial arterial in the Playa Vista neighborhood. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue, approximately 630 feet west of the Project Site.
- St. John's Health Center, approximately 780 feet east of the Project Site.

Existing Project Site Emissions

The Project would be located on the currently undeveloped portion of the Project Site. Therefore, there are no emissions of criteria pollutants generated from this portion of the Project Site (the remaining development on the Project Site would be retained as part of the Project).

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

Less Than Significant Impact. This criterion focuses on whether the Project would conflict with the growth assumptions, control measures, and attainment strategy in the adopted 2022 AQMP, including whether the Project would delay timely attainment of air quality standards or emission reductions specified in the AQMP. As described further under subsection (b), the Project's air quality emissions would not result in any exceedances of any state or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants.

The Project would also not delay timely attainment of air quality standards or emission reductions specified in the AQMP, as it would not contribute to growth levels that exceed those that were anticipated and accommodated in the region's attainment plan. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the Project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

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 local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates 4,771,300 persons; 1,793,000 households; and 2,135,900 jobs in the City of Los Angeles by 2045.

Development of the Project would result in approximately 9 employees on-site.[10] As a result, the on-site increase in jobs would not produce job growth that exceeds the capacity that is accommodated in the l2022 AQMP. As a result, the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below under Thresholds (b), (c), and (d), the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the proposed Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would serve to implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG. The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate more jobs in a high quality transit area (HQTA). "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project

[10] Raju Associates, Inc., Transportation Technical Memorandum, January 31, 2024.

would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. In addition, as demonstrated in the following analyses, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

The Project Site is classified as Light Industrial in the General Plan, a classification that allows self-storage and retail uses such as those proposed by the Project. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected jobs on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The Project is consistent with the current land use designations as described in the Community Plan and would not generate employment growth beyond the RTP/SCS employment projections. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

City of Los Angeles Policies

In addition to the 2022 AQMP and 2024-2050 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below in Table III-3, the Project would be consistent with the applicable policies of the Air Quality Element.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Not Applicable.** The Project would not involve use of unpaved roads or parking lots.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would include storage and retail employees that could access transportation options to driving to work. The Project Site is well-served by public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Administrative employees could use high-speed telecommunications services as an alternative to driving to work. A June 2020 study by the National Bureau of Economic Research found that 37 percent of

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	jobs can be performed entirely from home (https://www.nber.org/papers/w26948). As such, the Project could help reduce commuting to work through telecommuting.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** While the Project does not offer market-based incentives, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site. Class II bicycle lanes on Millennium Drive one block south of the Project Site would also support bicycling.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** While the Project does not offer parking management programs, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project would not include facilities for special events.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project is a low traffic generator because of the nature of self-storage facilities, with ancillary retail space, which would generate a fraction of the vehicle trips of a retail, commercial, or even residential project. For example, the bulk of storage trips would occur in the mid-day off-peak periods. Further, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be entitled and environmentally cleared at the local level. The Project would not inhibit the implementation of this policy.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would be infill development that would provide the City's residents with proximate access to jobs and services at this Project Site.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would promote public transit, active transportation, who can use alternatives to driving. This includes three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees can benefit from the 32 short- and 32 long-term bicycle parking spaces on-site. Class II bicycle lanes on Millennium Drive one block south of the Project Site would also support bicycling.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would support the use of alternative transportation modes for employees and visitors, who can use alternatives to driving. This includes public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities. The Project would not inhibit the implementation of this policy.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations. The Project would not inhibit the implementation of this policy.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants. The Project would not inhibit the implementation of this policy.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Consistent.** The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code, and natural gas would not be used at the site.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs. The Project would not inhibit the implementation of this policy.
Source: DKA Planning, 2024.	

Conclusion

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

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term) as illustrated in Tables III-5 and III-6, respectively. However, as discussed in the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.24 model and a projected construction schedule of approximately 12 months. Table III-4 summarizes the estimated construction schedule that was modeled for air quality impacts.

Table III-4
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1 (2 weeks)	Removal of approximately 28,500 square feet of asphalt/concrete parking lot hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 1 (2 weeks)	Grubbing and removal of trees, plants, landscaping, and weeds.
Grading	Month 2	Approximately 13,541 cubic yards of soil (including swell factors for topsoil and dry clay) hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Trenching	Months 3-5	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-12	Footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 7	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 11-12	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2024.		

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

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

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

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

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

Regional Emissions

Construction activity creates air quality emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. NO_X emissions would primarily result from the use of construction equipment and truck trips. Fugitive dust emissions would peak during grading activities, where approximately 13,541 cubic yards of soil (including swell factors for topsoil and clay) would be exported from the Project Site to accommodate a one-level subterranean structure. All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent. During the building finishing phase, the application of architectural coatings (e.g., paints) would release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources.

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As shown in Table III-5, construction of the Project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project

would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone), and this impact would be less than significant.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[11] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2010-2022) for the Project area.

Table III-5
Daily Construction Emissions (Unmitigated)

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2027	1.5	18.9	16.9	0.1	5.0	2.3
2028	19.0	13.4	20.7	<0.1	1.2	0.6
Maximum Regional Total	19.6	18.9	20.8	0.1	5.0	2.3
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	19.3	12.2	13.9	<0.1	3.3	1.8
Localized Threshold	N/A	91	664	N/A	5	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).
Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs. Estimates reflect the maximum daily emissions during summer or winter season, whichever is highest. LST analyses based on 1-acre site with 25-meter distances to receptors in Southwest Coastal LA County source receptor area. Modeling sheets included in Appendix A of this IS/MND.

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 the Southwest Coastal LA County SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences approximately 120 feet (36.6 meters) to the south of the Project Site at 12665 Village Lane. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

[11] South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

As shown in Table III-5, above**,** the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, including watering portions of the Project Site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include consumer products such as cleaners, architectural coatings for routine maintenance, and landscaping equipment. Energy sources include electricity for space heating and water heating. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality emissions to the region primarily from motor vehicles that access the Project Site. The Project could add up to 318 vehicle trips to the local roadway network on a weekday at the start of operations in 2028.[12]

As shown in Table III-6, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the Project's operational impacts on regional and localized air quality would be less than significant.

Table III-6
Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	2.6	<0.1	3.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.4	0.4	<0.1	<0.1	<0.1
Mobile Sources	1.1	0.8	9.2	<0.1	2.1	0.6
Regional Total	3.7	1.2	13.1	<0.1	2.2	0.6
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	2.6	0.4	4.1	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	91	664	N/A	1	1
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analyses based on one-acre site with 25-meter distances to receptors in Southwest Coastal LA County SRA
Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs (included in Appendix A to this IS/MND). Totals reflect the summer season maximum and may not add up due to rounding.

[12] City of Los Angeles VMT Calculator, version 1.3 screening analysis.

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

Less Than Significant Impact. As discussed previously, there are several sensitive receptors within 0.25 miles of the Project Site that could be exposed to air pollution from construction and operation of the Project, including, but not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue; 630 feet west of the Project Site.
- St. John's Health Center; 780 feet east of the Project Site.

Construction

As shown in Table III-5, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

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

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 12 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

The Project Site would be developed with mini-warehouse and retail uses, land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[13] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[14] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

However, the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[15] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

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

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[13] California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

[14] South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

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

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 382 vehicle trips to the local roadway network on weekdays when the development could be fully leased and operational in 2028.[16] The majority of vehicle-related impacts at the Project Site would come from up to 31 and 57 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.[17] This would represent 0.9 percent of the 3,293 vehicles currently using Jefferson Boulevard at Westlawn Avenue in the A.M. peak hour.[18] Assuming peak hour volumes represent 10 percent of daily volumes, this intersection would carry 32,930 daily vehicle trips, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.[19] Therefore, the Project's potential to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors and would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds

[16] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024.

[17] Ibid.

[18] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf, 2018 traffic counts adjusted by one percent growth factor to represent existing conditions.

[19] South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including 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). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

identified above also be considered cumulatively considerable.[20] Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

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

IV. BIOLOGICAL RESOURCES

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

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

B Tree Report, The Tree Resource, April 21, 2025

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

No Impact. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited above. The Project Site is located in an urbanized and developed area of the City, and is currently developed with a mini-warehouse building and a surface parking lot. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.[21] No hydrological features are present on the Project Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. No riparian areas or other sensitive natural communities are located on the Project Site. The nearest riparian habitat is Ballona Creek, which is located approximately 1,800 feet north of the Project Site, and the nearest sensitive natural community is the Ballona Wetlands, located approximately 4,800 feet west of the Project Site. Intervening development separates the Project Site from both the Ballona Creek and the Ballona Wetlands, and thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities, and no impact would occur.

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

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

[21] NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, accessed March 20, 2024.

Wetlands Inventory identified no wetlands or water features on the Project Site. Therefore, no impact would occur.[22]

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

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

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

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance No. 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut *(Juglans californica var. californica)*; Western Sycamore *(Platanus racemosa)*; and California Bay *(Umbellularia californica)*.[23] In addition, in December 2020, Mexican Elderberry (*Sambucus Mexicana*) and Toyon (*Heteromeles arbutifolia*) were added to the class of "protected trees" (Ordinance No. 186873). According to the tree report prepared for the Project Site (included as

[22] U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML, accessed February 21, 2024.

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

Appendix B of this IS/MND), there are two trees on the Project Site and nine street trees adjacent to the Project Site. Of these on-site trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of two on-site non-protected trees, while the street trees would be preserved. The existing trees that would be removed as part of Project construction would be replaced according to City requirements. As none of the trees located on the Project Site are protected trees, impacts would be less than significant impact.

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

No Impact. A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of the City, and is currently developed with a mini-warehouse facility and an associated surface parking lot. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[24] Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

The Project Site is located in a highly urban area, and is not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. As discussed above, the Ballona Creek is approximately 1,800 feet north of the Project Site and the Ballona Wetlands are approximately 4,800 feet west of the Project Site. However, like the Project, none of the related projects would impact either the Ballona Creek or the Ballona Wetlands. It is assumed that like the Project, the related projects would be required to comply with the requirements of the MBTA as well as the City's Protected Tree Ordinance and the City's requirements regarding street tree removal and replacement. Because the Project would not result in any significant impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

[24] City of Los Angeles General Plan Conservation Element, Exhibit B2.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
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 analysis in this section is based in part on the following, which is included in Appendix C of this IS/MND:

C Cultural Resources Inventory, PaleoWest Archaeology, March 7, 2019.

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

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

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

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

Less Than Significant Impact. State CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities. According to the cultural resources inventory included in Appendix C of this IS/MND, there are no known archaeological sites on the Project Site or within a quarter-mile radius, and the Project Site is located within an urbanized area that has been subject to grading and development in the past. For these reasons, the potential to encounter unique archeological resources is considered low. Nonetheless, should archaeological resources be discovered during grading or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, the City has established a standard condition of approval to address the inadvertent discovery of archaeological resources with which the Project would comply. Should archaeological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the discovery so that the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey or report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Compliance with the above would ensure that Project impacts would be less than significant.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in an urbanized area that has been subject to grading and development in the past. However, the portion of the Project Site that would accommodate the Project is currently undeveloped. In addition, the Project Site is located within the vicinity of Playa Vista, where Native American remains have been previously unearthed. Should human remains inadvertently be encountered during ground-disturbing activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American

burials would be required. Work would stop immediately, and the County Coroner would be contacted. In addition, the Project would comply with the City's standard condition of approval for inadvertent discovery of human remains, which states the following:

> **Human Remains Inadvertent Discovery.** In the event that human skeletal remains are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5, which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:
>
> Stop immediately and contact the County Coroner:
> 1104 N. Mission Road
> Los Angeles, CA 90033
> 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
> 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

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

Compliance with the above would ensure appropriate treatment of any potential human remains discovered during Project construction activities. Therefore, the Project's impacts on human remains would be less than significant.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historic resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. The Project would implement standard City conditions of approval and would comply with State regulations related to the inadvertent discovery of any archaeological resources and/or human remains, if necessary. Like the Project, the related projects would be subject to regulatory requirements related to the inadvertent discovery of archaeological resources and human

remains, and would implement mitigation measures, if necessary. Therefore, cumulative impacts with respect to historical resources, archaeological resources, and human remains would be less than significant.

VI. ENERGY

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

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

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

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

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

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

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

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

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

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

5. The effects of the project on energy resources;

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

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

8. Whether the project conflicts with adopted energy conservation plans.

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

Project Impacts

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

Construction

Electricity

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

Natural Gas

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

Transportation Energy

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

Operation

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

Electricity

Buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 1,291,490 kWh per year (refer to Table VI-1). In addition, by 2020, LADWP was required to procure at least 33 percent of their energy portfolio from renewable sources. The

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

current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[26] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as: 1) interior lights in the mini-warehouse building, except emergency lights, will be operated via motion detector so that they will be off most of the time; 2) the self-storage building will be climate-controlled and will only be heated if the interior temperatures reach approximately 55 degrees and cooled only when interior temperatures reach approximately 80 degrees; and 3) solar panels to support the power needs of the building.

Based on LADWP's 2022 Final Power Strategic Long-Term Resource Plan (SLTRP), LADWP forecasts that its total energy sales in the 2027-2028 fiscal year (encompassing the Project's 2028 buildout year) is estimated to be approximately 21,273 GWh of electricity[27] As such, the Project-related increase in annual electricity consumption of 1,291,490 kWh per year would represent approximately 0.006 percent of LADWP's projected sales in the 2027-2028 fiscal year. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption, and the Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. Further, the Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[28] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for any energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, the Project's impacts related to the consumption of electricity would be less than significant.

Table IV-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
Retail	3,959 sf	39,418
Storage	78,365 sf	1,248,256
Parking	--	3,816
	Total	**1,291,149**

[26] CEC, Utility Annual Power Content Labels for 2022, www.energy.ca.gov/pcl/labels/.

[27] LADWP, 2022 Power Strategic Long-Term Resource Plan, December 2022, Appendix A.

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

Table IV-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
sf =square feet kw-h = kilowatt-hour yr = year		
[1] Calculated via CalEEMod. Refer to Appendix A of this IS/MND.		
Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.		

Natural Gas

The Project would not use any natural gas during operation and therefore would not result in any impact with respect to natural gas consumption.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted previously, the Project Site is located in an HQTC designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. Transit service in the Project area includes Metro Line 110, LADOT Commuter Express 437B, Culver City Line 4, and the Playa Vista Daily Shuttle. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for employees and visitors.

During Project operations, vehicles traveling to and from the Project Site are also assumed to comply with Corporate Average Fuel Economy (CAFE) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. It is anticipated that the future Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout

the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.006 percent of LADWP's projected sales in 2027-2028. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's service provisions.

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

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,502 MW on August 31, 2017.[29] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2018, the base case peak demand for the power grid is 5,820 MW.[30] In comparison to the LADWP power grid base peak load of 5,820 MW in 2018, the Project would represent approximately 0.002 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.[31] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity usage during Project operation presented on Table IV-1 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-

[29] LADWP, https://www.ladwp.com/who-we-are/power-system/facts-figures, accessed July 3, 2024.

[30] LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

[31] LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2022 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity. In addition, as also discussed above, the Project would not use any natural gas during either construction or operation, and therefore would not have an effect on natural gas supplies.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[32] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

Due to the Project Site location, most on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[33]

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

[33] CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed July 3, 2024.

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

Approximately 527,839 thousand barrels of crude oil (approximately 22.2 billion gallons) were supplied to California refineries in 2022.[34] Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves. As noted previously, the Project Site is located in an HQTC designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. Transit service in the Project area includes Metro Line 110, LADOT Commuter Express 437B, Culver City Line 4, and the Playa Vista Daily Shuttle. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for employees and visitors.

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

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

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

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. As discussed previously, the 2024-2050 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2024-2050 RTP/SCS. The Project would provide

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

commercial and mini warehouse uses in close proximity to existing public transportation. This is evidenced by the Project Site's location within a designated HQTC. The 2024-2050 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2024-2050 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2024-2050 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would not conflict with adopted energy conservation plans.

Conclusion

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

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

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include, but are not limited to, the California Title 24 energy standards, the 2022 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency. In addition, the Project would implement sustainability measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2024-2050 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's proximity to existing public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant.

Cumulative Impacts

Electricity

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

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

Natural Gas

As discussed previously, the Project would not use any natural gas. However, the related projects would result in an increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. The related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future vehicle trips are expected

to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, the Project and the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative 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 analysis in this section is based in part on the following item, which is included as Appendix D of this IS/MND:

D Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024.

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

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

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

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

According to the Geotechnical Analysis prepared for the Project (included in Appendix D of this IS/MND), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and the possibility of fault rupture through the Project Site is considered to be low.[35] Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the Alquist-Priolo Special Studies Zone Map issued by the State Geologist in 2014 for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to compliance with existing State and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical

[35] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 9.

report prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site, and Project impacts with respect to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

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

However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

According to the Geotechnical Analysis prepared for the Project Site (included in Appendix D of this IS/MND), the Project Site is located within a designated Liquefaction Hazard Zone, according to the Seismic Hazard Evaluation Report for the Venice Quadrangle published by the California Geological Survey. Therefore, a liquefaction analysis was prepared for the Project and is included in the Geotechnical Analysis (included in Appendix D of this IS/MND). The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to liquefaction. Through compliance with the LABC and recommendations included in the Final Geotechnical Report, impacts related to liquefaction would be less than significant, and development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction.

iv. Landslides?

No Impact. The Project Site is relatively flat and according to the geotechnical report (included in Appendix D) and ZIMAS, is not identified as being within a landslide hazard zone.[36] Therefore, the potential for landslides is negligible, and the Project would result in no impact with respect to landslides.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently developed with a four-story mini-warehouse building and an associated surface parking lot. However, the portion of the Project Site that would accommodate the Project is currently undeveloped. During the Project's construction phase, activities such as excavation for utilities and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization

[36] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 10.

measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

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

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

Less Than Significant Impact. As discussed previously, the Project Site is located within a designated Liquefaction Hazard Zone, according to the Seismic Hazard Evaluation Report for the Venice Quadrangle. The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to liquefaction. In addition, according to the Geotechnical Analysis prepared for the Project Site, the potential for lateral spreading or liquefaction-inducted surface manifestations are considered low.[37]

The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and Project impacts would be less than significant.

[37] Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 7.

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

No Impact. Based on the Geotechnical Analysis prepared for the Project Site, soils at the Project Site are considered to have a very low expansive potential.[38] Therefore, the Project would not cause or exacerbate geologic hazards, and no impact with respect to expansive soils would occur.

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

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

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and is not known to contain any unique paleontological resource or site or unique geological feature. As such, the likelihood of unearthing unique paleontological resources is considered low. The Project would be required to comply with existing plans and regulations related to the inadvertent discovery of unknown paleontological resources should they be encountered during ground disturbing activities. Those plans and regulations can be found in the General Plan Conservation Element and Section 5097.5 of the Public Resources Code. In addition, the City has established a standard condition of approval to address the inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the find. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey or report shall be submitted to the Los Angeles County Museum of Natural History and the Department of City Planning. Ground-

[38] Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 14.

disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with this condition of approval, all activities would be conducted in accordance with regulatory requirements. Compliance with the above would ensure that Project impacts would be less than significant.

Cumulative Impacts

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

VIII. GREENHOUSE GAS EMISSIONS

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

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

E Greenhouse Gas Emissions Technical Modeling, DKA Planning, June 2024.

Climate Change Background

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

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

GHG Emissions Background

GHG emissions include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[39] Carbon

[39] As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

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

State

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

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

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

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

EO S-3-05

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

AB 32

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

- By 2010, reduce statewide GHG emissions to 2000 levels.[40]
- By 2020, reduce statewide GHG emissions to 1990 levels.

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

SB 97

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

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

[40] The 2010 target to reduce GHG emissions to 2000 levels was not met.

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

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

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

SB 375

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

EO-B-30-15

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

SB 32

Signed in September 2016 by Governor Brown, SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing

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

tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

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

AB 1297

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

SB 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[42]

Cap-and-Trade Program

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

Climate Change Scoping Plans

The Scoping Plan is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the 2022 Scoping Plan Update in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business-as-usual activities. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change

[42] Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.

and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted focus to the newer SB 32 goal of a 40 percent below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

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

Table VIII-1
Estimated Statewide GHG Emissions Reductions in the 2022 Scoping Plan

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

Notes:

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[A] 312 – 260 = 52. 52 / 312 = 16.7%

Source: CARB, Final 2022 Climate Change Scoping Plan, December 2022.

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

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

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

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in the 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022)	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates

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

Bill/Executive Order	Summary
Clean Energy, Jobs, and Affordability Act of 2022	the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.

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

Bill/Executive Order	Summary
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below

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

Bill/Executive Order	Summary
	the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator

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

Bill/Executive Order	Summary
	insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of

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

Bill/Executive Order	Summary
	the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:

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

Bill/Executive Order	Summary
	• Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity for retail sales. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.

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

Bill/Executive Order	Summary
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law set specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in the 2022 Scoping Plan Update.

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

Achieving the targets described in the 2022 Scoping Plan will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one

agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

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

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

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

Regional

2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

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

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain

NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on April 4, 2024, SCAG's long-range plan, the 2024-2050 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2024-2050 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2024-2050 RTP/SCS calls for $751.7 billion in investments, including $303.3 billion for transit projects and operations, $75.4 billion for state highway operations and maintenance, $62.6 billion for goods movement, and $38 billion for active transportation. These investments would aim to achieve several key objectives:

- A 11.6 percent reduction in overall vehicle miles traveled among passenger vehicles (from 2019).
- A 31.8 percent reduction in minutes of daily traffic delay per person (from 2019).
- Achievement of the region's targets for reducing greenhouse gases from autos and light-duty trucks by 19 percent per capita, from 2005 levels, by 2035.
- 465,000 new jobs supported by transportation investments or improved competitiveness each year.
- An overall return on investment of $2 for every $1 spent.

The 2024-2050 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Development Areas (PDAs) and aims to enhance and build out the region's transit network. According to the 2024-2050 RTP/SCS, 66 percent of new households and 54 percent of new jobs between 2019–2050 will be located in PDAs, either near transit or in walkable communities.

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

South Coast Air Quality Management District CEQA Guidance

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

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

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[43] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[44] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

Local

City of Los Angeles Green New Deal

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

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

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

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

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

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.

- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).

- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.

- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.

- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.

- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.

- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.

- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).

- Eliminate organic waste going to landfills by 2028.

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

- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

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

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

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

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

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

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

Mobility Plan 2035

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

Existing Conditions

Existing Statewide GHG Emissions

CARB reports that in 2019, emissions from GHG emissions statewide were 404 $MMTCO_2e$, 27 $MMTCO_2e$ below the state's 2020 GHG limit of 431 $MMTCO_2e$. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

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

Existing Project Site Emissions

The Project would be located on the currently undeveloped portion of the Project Site. Therefore, there are no GHG emissions generated from this portion of the Project Site (the remaining development on the Project Site would be retained as part of the Project).

Thresholds of Significance

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

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

CEQA Guidelines Section 15064.4 recommends that lead agencies make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. Lead agencies have discretion to determine whether to quantify GHG emissions of projects and/or consider several other qualitative factors that may be used in the determination of significant of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significant threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those

thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).[45] It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for cumulative GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.[46]

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2024-2050 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the 2022 Scoping Plan Update, as well as the City's Green New Deal.

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

[46] See for example: San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR – 2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$ per year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.

Methodology

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

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

For informational purposes only, the analysis also estimates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below, and is not used for a comparative analysis or threshold of significance. The primary purpose of quantifying the Project's GHG emissions is to satisfy the State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Plans

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction strategies. As discussed previously, the Project will be evaluated for consistency with the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2022 Scoping Plan Update provides measures to achieve the State's GHG reduction targets. On a regional level, SCAG's 2024-2050 RTP/SCS contains measures to achieve VMT reductions (and corresponding GHG reductions) required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the

relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change. This analysis addresses consistency with the Green New Deal's strategies and goals. Thus, if the Project is designed in accordance with the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (i.e., SB 375 for the 2024-2050 RTP/SCS and AB 1279 for the 2022 Scoping Plan Update). A consistency analysis is provided and describes the Project's compliance or conflict with performance-based standards included in the applicable portions of the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

2022 Scoping Plan Update

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

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

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

Quantification of Project GHG Emissions

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

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

Construction

The Project's construction emissions were calculated using CalEEMod Version 2022.1.1.24. Details of the modeling assumptions and emission factors are provided in Appendix E of this IS/MND. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

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

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[47] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operation

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

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

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

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

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

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG

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

emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

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

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2021 model (1.0.1) and considers actions and mandates expected to be in force in 2028 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips because of project features (e.g., proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2028 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement several policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

Analysis

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

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

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

Plan Consistency

Less Than Significant Impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal. As demonstrated below, the Project would be

consistent with these applicable GHG reduction plans and policies, and its GHG impact would therefore be less than significant.

2024-2050 RTP/SCS

Table VIII-3 provides a comparison of the Project against the GHG-related performance measures of the 2024-2050 RTP/SCS.

Table VIII-3
Consistency with the 2024-2050 RTP/SCS

Performance Measure	Consistency Analysis
Decrease average distance traveled for work trips from 16.2 to 15.9 miles by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs near residential uses, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and decrease the need for longer commutes.
Decrease average distance traveled for non-work trips to 6.1 miles by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of all trips ten miles or less from 46.9 to 47.6 percent by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of all trips 25 miles or less from 80.1 to 80.7 percent by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of work trips by SOV from 65.9 to 61.9 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor.
Increase share of all trips by SOV from 37.0 to 34.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor.
Decrease share of work trips by SOV from 23.9 to 21.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use by centralizing more jobs on the Project Site.

Performance Measure	Consistency Analysis
Decrease share of all trips by SOV from 48.7 to 46.3 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use.
Increase share of work trips by transit from 4.6 to 7.9 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions.
Increase share of all trips by transit from 3.9 to 5.3 percent by 2050.	**No Conflict.** The Project would increase the density of development on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions.
Increase share of work trips by walking from 3.6 to 4.3 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, in close proximity to existing residential uses, in an area that is served by a developed sidewalk network. As such, the Project could increase the share of walking commute trips over existing conditions.
Increase share of all trips by walking from 8.8 to 10.2 percent by 2050.	**No Conflict.** The Project would increase the density of development on the Project Site, which is served by a developed sidewalk network. As such, the Project could increase the share of walking trips over existing conditions, particularly to the retail uses on-site.
Increase share of work trips by bicycle from 1.9 to 4.1 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is located in an area with flat streets. In addition, the Project would include a total of 64 bicycle parking spaces. As such, the Project could increase the share of bicycling commute trips over existing conditions.
Increase share of all trips by bicycle from 1.6 to 3.5 percent.	**No Conflict.** The Project would increase the density of development on the Project Site, which is located in an area with flat streets. In addition, the Project would include a total of 64 bicycle parking spaces. As such, the Project could increase the share of bicycling trips over existing conditions, particularly to the retail uses on-site.
Reduce person hours of delay on highways from 1,266,283 to 1,024,863 by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve long-distance, highway-based trips. As such, the Project would not promote highway-based driving that would contribute to congestion and delay.
Reduce person hours of delay on HOV lanes from 84,351 to 12,345 by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would

Performance Measure	Consistency Analysis
	generally not involve long-distance, highway-based trips. As such, the Project would not promote highway-based use of HOV lanes that would contribute to congestion and delay.
Reduce person hours of delay on arterials from 1,245,043 to 927,265 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce person hours of delay on all facilities from 2,868,470 to 2,184,952 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce daily minutes of delay per capita from 8.2 to 6.3 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce truck delay on highways from 140,249 to 119,137 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve long-distance, highway-based trips or use of heavy-duty trucks. As such, the Project would not promote highway-based use of heavy-dusty trucks that would contribute to congestion and delay.
Reduce truck delay on arterials from 28,457 to 22,621 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve use of heavy-duty trucks. As such, the Project would not contribute to congestion and delay from trucks.
Reduce truck delay on all facilities from 173,039 to 144,812 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve use of heavy-duty trucks. As such, the Project would not contribute to congestion and delay from trucks.
Reduce average travel time to work from 27.8 to 27.1 hours by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050

Performance Measure	Consistency Analysis
	RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes.
Increase annual number of transit boardings per capita from 47.2 to 77.5 by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit boardings over existing conditions.
Increase share of jobs accessible within 30 minutes by auto from 12.2 to 13.4 percent by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips less than 30 minutes, particularly based on the proximity of existing residential uses to the Project Site.
Increase share of jobs accessible within 45 minutes by transit from 1.8 to 2.6 percent by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips by public transit.
Increase share of shopping destinations accessible within 15 minutes by auto from 4.2 to 4.6 percent by 2050.	**No Conflict.** The Project includes ground-floor retail accessible by auto. In addition, the Project would not inhibit the region's efforts to add to the supply of shopping options in metropolitan Los Angeles County.
Increase share of shopping destinations accessible within 30 minutes by transit from 0.4 to 0.6 percent by 2050.	**No Conflict.** The Project includes ground-floor retail that would be accessible by transit. In addition, the Project would not inhibit the region's efforts to add to the supply of shopping options in metropolitan Los Angeles County near public transit.
Increase share of educational destinations accessible within 30 minutes by auto from 12.1 to 13.4 percent by 2050.	**No Conflict.** The Project does not include educational destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of educational options in metropolitan Los Angeles County.
Increase share of educational destinations accessible within 30 minutes by transit from 0.2 to 0.4 percent by 2050.	**No Conflict.** The Project does not include educational destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of educational options in metropolitan Los Angeles County near public transit.
Increase share of healthcare destinations accessible within 30 minutes by auto from 16.7 to 18.4 percent by 2050.	**No Conflict.** The Project does not include healthcare destinations. Nevertheless, it would not inhibit the region's

Performance Measure	Consistency Analysis
	efforts to add to the supply of healthcare options in metropolitan Los Angeles County.
Increase share of healthcare destinations accessible within 30 minutes by transit from 0.3 to 0.5 percent by 2050.	**No Conflict.** The Project does not include healthcare destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of healthcare options in metropolitan Los Angeles County near public transit.
Increase share of work trips less than three miles from 16.5 to 16.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips less than three miles, particularly based on the proximity of existing residential uses to the Project Site.
Increase share of non-work trips less than three miles to 41.8 percent	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will increase the density of development on the Project Site that would potentially increase the share of storage and retail trips less than three miles.
Increase share of regional housing units within designated Priority Development Areas (PDAs) from 57.0 to 61.1 percent by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to housing units in PDAs.
Increase share of population able to reach a park within 30 minutes by auto to 99.6 percent by 2050.	**No Conflict.** The Project does not include residential uses or parks. Nevertheless, it would not inhibit the region's efforts to add to housing units or parklands.
Increase share of population able to reach a park within 30 minutes by transit from 57.6 to 62.1 percent by 2050.	**No Conflict.** The Project does not include residential uses or parks. Nevertheless, it would not inhibit the region's efforts to add to housing units or parklands.
Decrease daily VMT per capita from 20.7 to 19.4 by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility. As such, it would help decrease VMT per capita. In addition, as discussed below under "Transportation," the Project's impacts related to VMT would be less than significant.
Decrease total square miles of greenfield and rural lands converted to urban use from 79.3 to 41.8 by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of urban sprawl and the conversion of greenfield and rural lands. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce GHG emissions.
Decrease energy consumption per household from 45.8 to 44.6 million BTUs by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to improve energy efficiency in residences.
Decreases urban water consumption per household from 75,100 to 74,600 gallons by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to promote water conservation in households.

2022 Scoping Plan Update

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

Transportation Electrification

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

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

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

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

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals. The Project would provide electric vehicle charging stations as well as conduits and infrastructure for future charging stations in conformance with LAMC requirements.

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

The State has adopted AB 1236 and AB 970, which require cities to adopt streamlined permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of

supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 20 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. While this measure mainly applies to City fleets, the Project would not interfere with this goal. The Project would provide electric vehicle charging stations as well as conduits and infrastructure for future charging stations in conformance with LAMC requirements.

VMT Reduction

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

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

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

The Project would comply with the City's requirement for retail and warehouse uses, though that includes a parking reduction of twenty percent to accompany the proposed Conditional Use Permit. While the Project would not reduce or eliminate parking supply from LAMC requirements, it would not conflict with this Citywide strategy to reduce parking standards for non-residential uses.

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

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

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

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

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

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

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2024-2050 RTP/SCS, also referred to as Connect SoCal. The 2024-2050 RTP/SCS's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

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

The Project's consistency with these strategies is largely demonstrated by its consistency with SCAG's 2024-2050 RTP/SCS, which is addressed and explained earlier in this subsection.

Building Decarbonization

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

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

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

The City has updated the LAMC with requirements for all new buildings, with some exceptions, to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating, and cooking for non-restaurant uses would be required to be powered by electricity. In future years, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. The Project will not include any natural gas use and so will exceed the requirements of 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. The City and LADWP have established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program, residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water use and associated GHG emissions.

The Project would not involve the retrofit of existing buildings. Therefore, the Project would not conflict with policies to implement energy efficiency retrofits.

Green New Deal

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

The Project would generally comply with these aspirations as it proposes development in an urban infill location that would promote increases in transit and active mode shares. Further, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal regarding energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for employees and visitors. Therefore, the Project would be consistent with the Green New Deal, and impacts would be less than significant.

Plan Consistency Conclusion

In summary, the Project's location, land use characteristics, and design would be consistent with 2024-2050 RTP/SCS, 2022 Scoping Plan Update, and Green New Deal efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant.

Project GHG Emissions

Construction

Project construction is anticipated to be completed in 2028. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix E of this IS/MND. The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

Construction of the Project is estimated to generate a total of 460 $MTCO_2e$ (Table VIII-4). As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's

operational emissions) to determine the Project's annual GHG emissions inventory.[48] This results in annual Project construction emissions of 15 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix E of this IS/MND.

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

Year	$MTCO_2e$[a]
2027	150
2028	310
Total	**460**
Amortized Over 30 Years	**15**

a CO_2e was calculated using CalEEMod version 2022.1.1.24. Detailed results are provided in Appendix E of this IS/MND.
Source: DKA Planning, 2024.

Operation

Area Source Emissions

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

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

Source Category	$MTCO_2$[a]
Area[b]	2
Energy[c] (electricity)	491
Mobile	374
Solid Waste[d]	32
Water/Wastewater[e]	65
Refrigerants	3
Construction	16
Total Emissions	**983**

a CO_2e was calculated using CalEEMod and the results are provided in the Technical Appendix.
b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. CalEEMod v2022.1.1.24 still quantifies natural gas emissions for retail and parking garage uses even when uses are powered by electricity.
d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.

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

[e] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.

Source: DKA Planning, 2024.

Electricity Emissions

GHG emissions are emitted because of activities in buildings when electricity and natural gas are used as energy sources. However, the Project would not use any natural gas. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

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

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

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

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. While the Project is expected to be powered by electricity, the emissions estimates from CalEEMod still include emissions from natural gas combustion, pending updates to the model. As

such, the estimates in this analysis overstate energy-related GHG emissions as the Project would not use natural gas.

CalEEMod electricity usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.[49] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-5, Project GHG emissions from electricity usage would result in a total of 491 $MTCO_2e$ per year.

Mobile Source Emissions

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

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the size of the retail and warehouse uses were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 11th Edition*.

The Project represents an infill development within an urbanized area that would concentrate self-storage uses within an HQTC.[50] The Project Site is in the dense Jefferson Boulevard corridor with proximity to Metro, LADOT, and Culver City local bus services. The Project would also provide bicycle parking and storage areas for Project employees and visitors.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table VIII-5, the Project GHG emissions from mobile sources would result in a total of 374 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

[49] California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

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

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-5, the Project is expected to result in a total of 32 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.[51]

Water Usage and Wastewater Generation Emissions

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

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[52] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2022 California Plumbing Code (which is based on the 2021 Uniform Plumbing Code), 2022 CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

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

As shown in Table VIII-5, Project GHG emissions from water/wastewater usage would result in a total of 65 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions

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

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

consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in Table VIII-5, the Project scenario is expected to result in a total of three $MTCO_2e$ per year from use of refrigerants that used HFCs and have high GWP values.

Combined Construction and Operational Emissions

As shown in Table VIII-5, when taking into consideration implementation of requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 983 $MTCO_2e$ annually, including amortized construction emissions.

Conclusion

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

Consistent with CEQA Guidelines Section 15064(h)(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB's 2022 Scoping Plan, the 2024-2050 RTP/SCS, and the City of Los Angeles Green New Deal.

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

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☐	☒

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment. Construction of the Project would not use a significant amount of hazardous materials, and the types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of similar

commercial buildings (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). While construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

The Project includes the construction of a new mixed-use mini-warehouse building on the Project Site. To the extent that the Project would require the transport, use, or disposal of small amounts of hazardous materials during operation (such as commercial-grade cleaning solvents, paints, or bleach, etc.), the use of these materials would be in accordance with existing local, state, and federal regulations, which would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project's impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to the public or the environment by releasing hazardous materials into the environment through accident or upset conditions. The Project would construct a three-story mixed-use mini-warehouse building with basement on the currently undeveloped portion of the Project Site, which would result in an expansion of the mini-warehouse uses and addition of retail uses on the Project Site. As described above, the use of any hazardous materials would be in accordance with existing local, state, and federal regulations, which would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. The Project Site is also located within a City of Los Angeles Methane Zone. Therefore, the Project would be required to comply with the City's methane mitigation regulations related to development in methane zones. Compliance with these existing regulations would ensure that Project impacts are less than significant.

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

Less Than Significant Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Animo Westside Charter Middle School is located within one-quarter mile of the Project Site. In addition, Playa del Rey Elementary School and Westside Neighborhood School are located in the general Project area (at a greater distance than one-quarter mile).

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

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

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

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis, commonly referred to as the "Cortese List." A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on the Project Site.[53] According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST (Underground Storage Tank) facilities, monitoring wells, or California Department of Toxic Substance Control (DTSC) cleanup sites or hazardous materials permits on the Project Site.[54] The Project Site has not been

[53] California Department of Toxic Substance Control, EnviroStor, website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29, accessed March 20 2024.

[54] California State Water Resources Control Board, GeoTracker, website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search, accessed March 20, 2024.

identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[55] In addition, there are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[56] Finally, the Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.[57] Therefore, the Project would not create a hazard to the public or the environment, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project is located within an airport land use plan, or within two miles of a public airport or public use airport, and would subject people residing or working in the area to a safety hazard or excessive noise levels. The Project Site is located within two miles of the Los Angeles International Airport (LAX). However, the Project Site is not located within the Airport Influence Area.[58] The height of the Project would be comparable to existing structures in the area, including the existing building on the Project Site, which would remain as part of the Project. In addition, people working at the Project Site would not be exposed to air traffic generated noise in excess of existing conditions. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency

[55] California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf, accessed March 20, 2024.

[56] California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, accessed March 20, 2024.

[57] California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/, accessed March 20, 2024.

[58] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, December 1, 2004.

access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD and the Los Angeles Department of Transportation (LADOT). The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by City regulations would ensure that Project impacts related to emergency response would be less than significant.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[59] Therefore, no impact would occur.

Cumulative Impacts

Due to their site-specific nature, impacts with respect to hazards and hazardous materials are also typically addressed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, like the Project, all related projects would be subject to local, state, and federal regulations pertaining to hazardous materials. Therefore, cumulative impacts with respect to hazards and hazardous materials would be less than significant.

[59] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, March 20, 2024.

X. HYDROLOGY AND WATER QUALITY

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

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

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

by the State Water Resources Control Board (SWRCB). During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

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

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants (e.g., typical commercial cleaning products, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment protocols. Regulatory compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Regulatory compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

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

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The Project Site is located in an urbanized area of the City and is partially developed with impervious surfaces (mini-warehouse building and surface parking lot). During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

Based on the Geotechnical Investigation conducted for the Project Site (refer to Appendix D of this IS/MND), groundwater was encountered within the test borings at depths of approximately 15 to 25 feet below grade, while the historic high groundwater depth for the Project Site is approximately 7 feet below grade.[60] If any dewatering operations are required during construction, they would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected. Finally, all water consumption associated with the Project would be supplied by LADWP and not from any groundwater beneath the Project Site. Thus, impacts related to groundwater would be less than significant.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation. The Project Site is located in a highly urbanized area of the City, and there are no natural watercourses on the Project Site. As discussed above, the Project Site is partially developed with impervious surfaces (mini-warehouse building and surface parking lot). Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would be developed with additional impervious surfaces, based on the addition of the proposed building. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. In addition, the Project

[60] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 6.

Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Project construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site, as the Project Site is currently developed with a mini-warehouse building and associated parking lot, which would be retained as part of the Project. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Regulatory compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site. Project impacts would therefore be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if a project would substantially increase the probability that polluted runoff would reach storm drains. Runoff from the Project Site currently is and would continue to flow toward the existing storm drain system. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP.

These "good-housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the Project would be required to comply with the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

iv. Impede or redirect flood flows?

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

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1760F).[61] Further, the Project Site is noy located in a Tsunami Hazard Zone.[62] Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

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

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in

[61] FEMA Flood Map Service Center, Search by Address, accessed March 20,2024.

[62] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, March 20, 2024.

stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that Project impacts with respect to a water quality control plan or groundwater management plan would be less than significant.

Cumulative Impacts

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

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?

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

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

Less Than Significant Impact. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.[63] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

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

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

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

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

Regional

SCAG's 2024-2050 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically. On September 3, 2020, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (also known as Connect SoCal). The 2024-2050 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2024-2050 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2024-2050 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTCs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

As discussed on Table XI-1, the Project would be substantially consistent with the applicable goals contained in the 2024-2050 RTP/SCS.

Table XI-1
Project Consistency with the 2024-2050 RTP/SCS

Goals	Consistency Assessment
Mobility	
07 Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	**No Conflict.** The Project would provide additional employment opportunities on a site that is well served by transit, including Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions. In addition, the Project would be developed in close proximity to existing residential and commercial uses, in an area that is served by a developed sidewalk network. The Project would also provide 64 bicycle parking spaces. As such, the Project could provide for increased mobility options.
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations.	
Communities	
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor. In addition, the Project's proximity to existing residential and commercial uses, particularly along Jefferson Boulevard, would reduce vehicle miles traveled and also result in increased combined trips across multiple destinations in the immediate vicinity of the Project Site, allowing for residents to access basic needs within a 15-minute walk or bike ride from their homes.
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled.	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses.	
Environment	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.	**No Conflict.** The Project would comply with the California Green Building Code, and would also include sustainability features, including interior lights controlled by a motion detector, climate control, and solar panels on the roof.
49. Support communities across the region to advance innovative sustainable development practices.	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.	**No Conflict.** As discussed above under both "Air Quality" and "Greenhouse Gas Emissions," the Project would result in less than significant impacts with respect to air quality and greenhouse gas emissions. In addition, as also discussed above, the Project is consistent with AB 32, SB 32, SB
52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions.	

Table XI-1
Project Consistency with the 2024-2050 RTP/SCS

Goals	Consistency Assessment
	375, and other initiatives designed to reduce GHG emissions.
Economy	
82. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers.	**No Conflict.** The Project would increase employment opportunities at the Project Site. In addition, the proposed min-warehouse use would support small businesses in the area.
Source: 2024-2050 RTP/SCS. Section 3.3, Regional Planning Policies.	

Local

City of Los Angeles General Plan

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

Framework Element

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

<u>Project Consistency Analysis</u>

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

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

Objective	Project Consistency
Framework Element: Land Use Chapter	
Goal 3A A physically balanced distribution of land uses that contributes towards and facilitates the • City's long-term fiscal and economic viability, • Revitalization of economically depressed areas, • Conservation of existing residential neighborhoods, • Equitable distribution of public resources, • Conservation of natural resources, • Provision of adequate infrastructure and public services, • Reduction of traffic congestion and improvement of air quality, • Enhancement of recreation and open space opportunities, • Assurance of environmental justice and a healthful living environment, and • Achievement of the vision for a more livable city.	**Consistent.** The Project would expand the current mini-warehouse use on the Project Site by developing a new mixed-use building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. This would also provide new jobs to the area. The Project would also include 64 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities (including Metro, Commuter Express, Culver City, and Playa Vista bus lines) would further reduce dependence on automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.
Policy 3.4.2 Encourage new industrial development in areas traditionally planned for such purposes generally in accordance with the Framework Long-Range Land Use Diagram and as specifically shown on the community plans.	**Consistent.** The Project includes the development of light industrial and commercial uses (mini-warehouse and retail uses) on a site that already contains mini-warehouse uses and that is designated for Light Manufacturing uses in the Palms – Mar Vista – Del Rey Community Plan.
Goal 3J Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	**Consistent.** The Project helps achieve this goal by expanding the current mini-warehouse use on the Project Site by developing a new building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. This would also provide new jobs to the area.
Objective 3.14 Provide land and supporting services for the retention of existing and attraction of new industries.	**Consistent.** The Project would provide mini-warehouse and retail uses, which are permitted by the Project Site zoning as well as by the Project Site's Light Industrial land use designation (with the General Plan Amendment to revise Footnote No. 1 and the Height District Change to Height District 2).
Policy 3.14.4 Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.	
Source: City of Los Angeles General Plan.	

Palms – Mar Vista – Del Rey Community Plan

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

Project Consistency Discussion

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

- To provide a viable industrial base with job opportunities for residents with minimal environmental and visual impacts to the community. (Objective 3-1, page III-6).

- Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities. (Policy 3-1.1, page III-7).

The Project would be substantially consistent with this objective and policy contained in the Community Plan. The Project would expand the current mini-warehouse use on the Project Site by developing a new mixed-use building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. The proposed uses are permitted by the Project Site's existing zoning as well as the Project Site's Light Industrial land use designation (with the General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site and the Height District Change to Height District 2). However, these requested changes relate to the allowable FAR of the Project, and the height of the Project (at three stories) would be less than the adjacent existing building on the Project Site, which is four stories. The Project's proposed uses would also provide approximately nine employment opportunities for nearby residents. The proposed retail space and expansion of the current mini warehouse use will directly provide employment opportunities in a building designed to be compatible with the surrounding neighborhood. Finally, as discussed throughout this IS/MND, all of the Project's environmental impacts would be less than significant with a mitigation measure for tribal cultural resources. The Project's visual impacts would be less than significant and no mitigation would be required.

Preservation of industrial land remains an important Citywide policy objective. The proposed General Plan Amendment to revise Footnote No. 1 and the Height District Change to Height

District 2 would not change the Project Site's underlying industrial status, allowing expansion of a mini-warehouse use on a site that currently contains such uses and allowing for implementation of the Project's pedestrian friendly design with ground-floor retail and additional landscaping. Expanding this light industrial use with a mix of active retail allows for an increase in industrial and commercial employment for community residents, while keeping industrial uses in their appropriate areas. Furthermore, the Project would enhance the immediate neighborhood and surrounding community by providing amenities on the ground floor, with active retail space and landscaping, as well as much needed storage for local residences and businesses. Therefore, the Project would substantially conform with the purpose, intent and provisions of the General Plan, and the Palms – Mar Vista – Del Rey Community Plan.

Los Angeles Municipal Code

Development of the Project is subject to the constraints of the Los Angeles Municipal Code (LAMC), notably Chapter I, the Planning and Zoning Code. The requested uses are typically permitted in other commercial and industrial zones, and the mini-warehouse use is an existing use of the Project Site. The proposed arrangement of the building as well as the parking, loading areas, lighting, landscaping, and other improvements would be comparable to other commercial, industrial, and residential structures within the adjacent properties. Exterior lighting will be provided for security for staff and customers. Rooftop equipment will be screened by the parapet on the proposed building so as not to be visible from the public right-of-way. Landscaping will be provided per City requirements. As such, the Project would properly relate to the site and surroundings. If the requested actions are approved, the Project would not be in conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.

Cumulative Impacts

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

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located in a City-designated Mineral Resource Zone 2 Area (MRZ-2).[64] Therefore, the Project would have no impact with respect to the loss of availability of a known regionally-important mineral resource, and no impact would occur.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address "minerals and other natural resources." According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through Downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present,[65] and much of the area around

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

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

the Project Site has been developed with structures and is inaccessible for mining extraction.[66] Furthermore, the Project Site is developed and located in an urbanized area. The addition of the proposed mixed-use mini-warehouse building to the Project Site would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

Cumulative Impacts

With regard to cumulative effects on mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts with respect to mineral resources would be less than significant.

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

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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 in this section is based on the following, which is included in Appendix F of this IS/MND:

F-1 Noise Technical Modeling, DKA Planning, February 2024.

F-2 Vibration Technical Modeling, DKA Planning, February 2024.

Existing Conditions

Noise-Sensitive Receptors

The Project Site is located on a major residential and commercial arterial in the Playa Vista community. Noise-sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue, approximately 630 feet west of the Project Site.
- St. John's Health Center, approximately 780 feet east of the Project Site.

Existing Ambient Noise Conditions

The Project Site is partially improved with a mini-warehouse building and associated surface parking lot. There is intermittent noise from the operation of the parking lot, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[67] This includes traffic on Jefferson Boulevard, which carries about 3,293 vehicles at Westlawn Avenue in the A.M. peak hour.[68]

In October 2022, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions of the neighborhood near sensitive receptors.[69] As shown in Table XIII-1, noise levels along roadways near the Project Site ranged from 56.2 to 67.8 dBA L_{eq}, based on exposure to traffic on Jefferson Boulevard, a major arterial that represents the major source of noise in the vicinity of the Project.

Table XIII-1
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 12665 Village Lane	Traffic on Jefferson Blvd.	67.8	65.8	Residences – 12665 Village Ln.	Conditionally Acceptable
B. Beatrice Street	Traffic on Beatrice St.	65.3	63.3	Residences – 5535 Westlawn Ave.; Production Studios – 12615 Beatrice St.	Conditionally Acceptable
C. 12855 Runway Road	Traffic on Jefferson Blvd.	64.5	62.5	Residences – 12855 Runway Rd.	Conditionally Acceptable
D. 12775 Millennium Drive	Traffic on Village Dr.	56.2	54.2	Residences – 12775 Millennium Dr.	Normally Acceptable

[a] Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.

[67] World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.

[68] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

[69] Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

[b] Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used.
Source: DKA Planning, 2024

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

Less Than Significant Impact.

Construction

On-Site Construction Activities

Project construction would generate noise during the approximately 12 months of demolition, site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings, as shown in Table III-4, above. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated. During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally less because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would often be utilized. This analysis assumes this and other on-site activities would be staged on-site during the phased construction process. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels, as identified in the 2006 L.A. CEQA Thresholds Guide. As shown in Table XIII-2, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. This assumes the use of best practices techniques required by the City's Building and Safety code, such as temporary sound barriers. These construction noise levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table XIII-2
Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
1. Production Studios – 12615 Beatrice St.	34.4	65.3	65.3	0.0	No
2. Residences – 5535 Westlawn Ave.	43.9	65.3	65.3	0.0	No
3. Residences - 12665 Village Ln.	61.9	67.8	68.8	2.0	No
4. Residences – 12775 Millennium Dr.	49.0	56.2	57.0	0.8	No
5. Residences – 12855 Runway Rd.	42.3	64.5	64.5	0.0	No
Source: DKA Planning, 2024.					

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate noise equivalent of up to an estimated 362 peak hourly passenger car equivalent (PCE) vehicle trips, as summarized in Table XIII-3, during the grading phase.[70] This would represent about 11.0 percent of traffic volumes on Jefferson Boulevard, which carries approximately 3,293 vehicles at Westlawn Avenue in the morning peak hour of traffic.[71] Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes overstates the likely traffic volumes from construction activities at this intersection.

Jefferson Boulevard would serve as part of the haul route for debris and soil exported from the Project Site given its direct access to the San Diego Freeway. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Jefferson Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, which is less than the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

[70] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

[71] DKA Planning, 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

Table XIII-3
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Jefferson Blvd.[e]
Demolition	13	0	29[b]	41	1.3
Site Preparation	8	0	0	8	0.2
Grading	10	0	352[c]	362	11.0
Trenching	5	0	0	5	0.2
Building Construction	37	40[d]	0	76	2.3
Paving	13	0	0	13	0.4
Architectural Coating	7	0	0	7	0.2

[a] Assumes all worker trips occur in the peak hour of construction activity.
[b] The Project would generate 106 haul trips over a 10-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert noise from haul truck trips to a passenger car equivalent
[c] The Project would generate 2,708 haul trips over a 21-day period with seven-hour work days. Assumes a 19.1 PCE.
[d] This phase would generate about 14.5 vendor truck trips daily over a seven-hour work day. Assumes a blend of vehicle types and a 9.55 PCE.
[e] Percent of existing traffic volumes on Jefferson Boulevard at Westlawn Avenue.

Source: DKA Planning, 2024.

Operation

On-Site Operational Noise

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

Mechanical Equipment

The Project would operate mechanical equipment on the roof that would generate incremental long-term noise. HVAC equipment in the form of rooftop units suitable for heating and cooling large volumes of a building would be located on the rooftop, approximately 45 feet above grade. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[72] However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. The presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop HVAC units

[72] City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.

by 8 dBA or more.[73] A two-foot high parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts, as identified in the 2006 L.A. CEQA Thresholds Guide. Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties.

Pad-mounted transformers that power high voltage to standard voltage used to power electronics and lighting would be located on the ground level in an unobstructed location. These transformers are housed in a steel cabinet and generally do not involve noisy equipment.

Otherwise, all other mechanical equipment would be fully enclosed within the structure. This can include mechanical, electrical, and plumbing rooms, a utility fan room, as well as elevator equipment (including hydraulic pump, switches, and controllers) in the subterranean basement. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

Auto-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting the development from the existing driveway off Jefferson Boulevard. The Project would result in the net total of approximately 101 daily trips.[74] Parking lot noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

The Project's auto-related activities on-site would not have a significant impact on the surrounding noise environment. First, the average of up to one vehicle entering or exit per minute during the peak hour would marginally elevate noise levels from the Project Site. Second, the 120-foot distance to the closest receptors would substantially attenuate noise from auto activity. Third, the high ambient noise levels (65.8 dBA CNEL) at nearest sensitive receptors across Jefferson Boulevard would be render any noise from the Project Site's auto activity as inaudible. As a result, auto-related activity on-site would not elevate ambient noise levels by 5 dBA CNEL at nearby sensitive receptors.

Outdoor Uses

While most activities associated with the storage and retail operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive

[73] Ibid.

[74] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024 (included in Appendix G-1 of this IS/MND).

receptors. This would include loading activities, trash collection, and landscape maintenance, which are discussed below:

- Loading Activities. On-site loading and unloading activities for the mini-warehouse facility would generally occur in one of two ways. Some customers would enter the parking area and load goods onto elevators that would access the loading lobby on the ground floor or storage areas on the upper floors. These loading activities would be contained within the partially enclosed parking spaces on the ground level and the storage facility itself. Others would park in the surface parking spaces, where goods could be moved into the storage facility. Loading activities would generate low levels of noise at these entrances during daytime business hours. As a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations. Further, LAMC Section 114.03 would regulate loading and unloading activities between 10:00 P.M. and 7:00 A.M.

- Trash collection. On-site trash and recyclable materials would be managed from the waste collection area on the first floor of the facility. Dumpsters would be moved to the street manually or with container handler trucks that use hydraulic-powered lifts that use beeping alerts during operation. Haul trucks would access solid waste from Jefferson Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[75] Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of trash collection activities during daytime hours would negligibly affect CNEL sound levels.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[76] The landscape plan focuses on a modest palette of accent trees and planters at the ground level that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of maintenance activities during daytime hours would negligibly affect CNEL sound levels.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land

[75] RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

[76] Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. These equipment generated a range of 74.0-88.5 dBA Leq at 50 feet.

use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant,

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the Project Site. The Project would result in the net total of approximately 101 daily trips.[77] The majority of vehicle-related noise at the Project Site would come from up to 31 and 57 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.[78] This would represent 0.9 percent of the 3,293 vehicles currently using Jefferson Boulevard at Westlawn Avenue in the A.M. peak hour.[79] Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA, as identified in the 2006 L.A. CEQA Thresholds Guide. As such, this impact would be considered less than significant.

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

Less Than Significant Impact.

Construction

Vibration (Building Damage) – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-4 summarizes vibratory levels for common construction equipment.

Table XIII-4
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202

[77] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024, included in Appendix G-1 of this IS/MND.

[78] Ibid.

[79] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project Site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.148 inches per second peak particle velocity (PPV) are projected to occur at the 12777 Jefferson Boulevard building, the nearest structure to the Project Site. This impact is below the 0.5 inches per second PPV threshold from FTA that is considered potentially harmful to Category I structures (as shown in Table XIII-5). More distant receptors would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. Construction of the Project would also comply with California Civil Code Section 832 and LAMC Section 91.3307, and applicable subsections, that govern the protection of adjoining property. As a result, construction-related structural vibration impacts would be considered less than significant.

Table XIII-5
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
12681 Jefferson Blvd.	50	0.045	0.045	0.038	0.018	0.002	0.30[b]	No
12636 Beatrice St.	50	0.045	0.045	0.038	0.018	0.002	0.30[b]	No
12777 Jefferson Blvd.	15	0.148	0.148	0.127	0.058	0.005	0.50[c]	No
12665 Village Lane	130	0.017	0.017	0.015	0.007	0.001	0.30[b]	No

[a] Includes 10-foot buffer for equipment maneuverability
[b] FTA criterion for Category II (engineered concrete and masonry buildings)
[c] FTA criterion for Category I (reinforced-concrete, steel or timber buildings)

Source: DKA Planning, 2024.

Vibration (Building Damage) – Off-Site Sources

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[80] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's anticipated haul route(s) on Jefferson Boulevard that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would therefore be considered less than significant.

Operation

During operation of the Project, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's vibration impacts during operation would be less than significant.

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

Less Than Significant Impact. The Project Site is located within two miles of the Los Angeles International Airport (LAX). However, the Project Site is not located within the Airport Influence Area.[81] People working at the Project Site would not be exposed to air traffic generated noise in excess of existing conditions. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in excessive noise for people residing or working in the area of the Project Site, and impacts would be less than significant.

[80] Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

[81] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, December 1, 2004.

Cumulative Impacts

Construction Noise

On-Site Construction Activities

During construction of the Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can generally affect noise-sensitive uses within 500 feet. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between. As discussed previously, there are four related projects within 1,000 feet of the Project Site. As illustrated in Table XIII-6, the cumulative noise impacts at the analyzed sensitive receptors would not be considered significant, as they would not exceed 5.0 dBA L_{eq}. These cumulative noise levels at the analyzed sensitive receptors are marginally higher than impacts from the Project alone, as more distant related projects have minimal impact on construction noise levels due to intervening structures that shield noise from more distant construction sites. Therefore, cumulative construction noise impacts would be less than significant.

Table XIII-6
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
1. Production Studios – 12615 Beatrice St.	54.3	65.3	65.6	0.3	No
2. Residences – 5535 Westlawn Ave.	51.7	65.3	65.5	0.2	No
3. Residences - 12665 Village Ln.	62.7	67.8	69.0	1.2	No
4. Residences – 12775 Millennium Dr.	49.6	56.2	57.1	0.9	No
5. Residences – 12855 Runway Rd.	50.5	64.5	64.7	0.2	No
Source: DKA Planning, 2024.					

Off-Site Construction Activities

Concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Project

would contribute noise equivalent of up to 362 peak hourly PCE vehicle trips during the grading phase.[82] This would represent about 11.0 percent of traffic volumes on Jefferson Boulevard, which carries approximately 3,293 vehicles at Westlawn Avenue in the morning peak hour of traffic.[83] The related projects would have to add 2,931 peak hour vehicle trips to double volumes on Jefferson Boulevard.

However, the four related projects within 1,000 feet of the Project Site would not be capable of generating this much truck traffic:

1. Related Project #1 at 12777 Jefferson Boulevard.[84] The scale of this 49,950 square foot office expansion would be slightly more than half of the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of approximately 100-200 PCE trips onto Jefferson Boulevard in a peak hour.

2. Related Project #2 at 12575 Beatrice Street. The scale of this 250,000 square foot office building would be about three times larger than the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of up to approximately 1,000 PCE trips onto Jefferson Boulevard in a peak hour.

3. Related Project #3 at 5405 Jandy Place. The scale of this 93,950 square foot office building would be comparable to the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of approximately 300-400 PCE trips onto Jefferson Boulevard in a peak hour.

4. Related Project #4 at 12555 Jefferson Boulevard. The remodeling of an existing building would not involve grading activities, which often generate the bulk of construction-related vehicle trips, given the number of haul trucks needed to export soil for new development.

Therefore, the four related projects could add the noise equivalent of 1,000 to 2,000 PCE trips onto Jefferson Boulevard, fewer than the 2,931 trips needed to double traffic volumes on Jefferson Boulevard. As such, cumulative noise due to construction truck traffic from the Project and related projects does not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for operational traffic impacts. As such, cumulative noise impacts from off-site construction would be less than significant.

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[82] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

[83] DKA Planning, 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

[84] While this project is on the list of related projects, this project has already been constructed and therefore would not result in the Project to result in any cumulative impacts.

Construction Vibration

Vibration impacts are generally limited to buildings and structures located near a construction site (i.e., within 15 feet as related to building damage). As noted earlier, the Project's potential to damage nearby buildings is less than significant. However, nearby structures could be subject to cumulative vibration impacts if concurrent construction was to occur nearby. However, the closest related project is an office expansion approximately 670 feet from the Project Site (related project #1). Based on the distance of the related projects from the Project Site, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA's vibration damage criteria or Caltrans criteria for historic buildings.

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The Project could generate an average of one hourly haul truck trip during the course of construction. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are existing buildings that are near the right-of-way of the anticipated haul route for the Project (e.g., Jefferson Boulevard). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from any related projects are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction activities would be less than significant.

Operational Noise

The Project Site and Playa Vista neighborhood have been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. The four related projects in the vicinity of the Project Site are commercial and office uses and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. These types of uses generally do not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from the related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Project. The presence of intervening multi-story buildings along

Jefferson Boulevard and the neighborhoods that flank it will generally shield noise impacts from one or more projects that may generate operational noise. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project would add up to 101 daily vehicle trips to the local roadway network on a peak weekday at the start of operations in 2028, including up to 57 maximum hourly vehicle trips.[85] The four related projects within 1,000 feet of the Project Site are projected to generate about 907 additional vehicle trips in the P.M. peak hour.[86] When combined with the Project, these five developments would add up to 964 maximum hourly vehicle trips onto local roadways, which would represent approximately 29.3 percent of vehicles currently using Jefferson Boulevard at Westlawn Avenue in the P.M. peak hour. Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, cumulative mobile source noise impacts associated with operation of the Project and related projects would be less than significant.

Operational Vibration

The Project Site and surrounding Jefferson Boulevard corridor have been developed with commercial, residential, and other uses that will continue to generate minimal groundborne vibration. During operation, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). In general, related projects in this corridor would be commercial or office land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

Like the Project, any concurrent development near the Project Site would contribute normal passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result in significant, cumulative increases in groundborne vibration on Jefferson Boulevard and other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

[85] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024, included in Appendix G-1 of this IS/MND.

[86] City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, November 2022.

XIV. POPULATION AND HOUSING

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

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

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

Construction

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

Operation

The proposed uses would generate up to 9 employment positions at the Project Site. Based on the nature of the Project, it is likely that the employees who would work at the Project would already reside in the surrounding area, and it is not anticipated that people would move to the area to work at the Project Site. The Project does not propose residential uses. Thus, employment

associated with the Project would not induce substantial unplanned population growth in the City, and this impact would be less than significant.

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

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

Cumulative Impacts

As discussed previously, the Project would provide employment positions that would likely be accommodated by people who already reside in the surrounding area, and the Project would not result in unplanned growth. The four related projects are all involve office uses. While it's possible some employees of the related projects would relocate to the Project area, many employees would likely already reside in the surrounding area, and would not result in unplanned growth. Thus, cumulative impacts related to population and housing would be less than significant.

XV. PUBLIC SERVICES

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

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

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if, as a result of LAFD not being able to adequately serve the Project with existing governmental facilities, there would be a need for a new or physically altered fire station to be constructed which would cause significant environmental impacts.[87] The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[88] The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

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

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

Construction

Construction and demolition activities associated with the Project could temporarily increase demand for fire protection. Such activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Project construction activities would comply with all applicable federal, state, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel will have training in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[89] Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

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

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

[89] Cal. Code of Regs., tit. 8, § 1920.

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

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

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

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

The Project's proposed uses would be similar to other uses in the Project vicinity. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire station nearest to the Project Site, which is LAFD Station No. 67, located at 5451 Playa Vista Drive, approximately 0.75 miles from the Project Site. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.

Pursuant to LAMC Section 57.09.07, the maximum response distance between a commercial/industrial use is 1 mile for an engine company and 1.5 miles for a truck company. If this maximum distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. LAFD Station No. 67, located at 5451 Playa Vista Drive, which is approximately 0.75 miles from the Project Site, would serve the Project Site. Station No. 67 is equipped with a truck company and an engine company. Therefore, as this station is within the required response distance of the Project Site, automated fire sprinklers would not be required. Nevertheless, the Project would include fire sprinklers.

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

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element and Policy 2.1.6 of the Safety Element, and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Consistent with the ruling of *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, further analysis, including a specific location,

would be speculative and beyond the scope of this document. Thus, the Project impacts on fire protection would be less than significant.

Cumulative Impacts

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

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.[90] The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[91] The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

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

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

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

The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Del Rey, Manchester Square, Mar Vista, Oakwood, Palms, Playa del Rey, Playa Vista, Venice, and Westchester areas.[92] The Pacific Community Police Station, located at 12312 Culver Boulevard, is approximately 1.4 miles driving distance from the Project Site. The West Bureau service area is 124 square miles in size has approximately 840,400 residents.[93] New staffing for the LAPD is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project would not introduce population to an area not served by a police station or an area otherwise not currently served by existing police services, and therefore the Project would not require new facilities or staffing requiring dedicated facilities.

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

[92] LAPD, West Bureau: https://www.lapdonline.org/lapd-contact/west-bureau/

[93] LAPD: https://www.lapdonline.org/lapd-contact/west-bureau/, accessed February 23, 2024

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

Cumulative Impacts

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

c. Schools?

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

Cumulative Impacts

Like the Project, the related projects include commercial uses that would not result in any direct demand for school services. However, similar to the Project, the applicants of the related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d. Parks?

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

Cumulative Impacts

Like the Project, the related projects are commercial uses that would not result in any direct demand for parks and recreational facilities, as they would not generate a residential population that would result in additional demand for parks and recreational facilities. Therefore, cumulative impacts to parks and recreational facilities would be less than significant.

e. Other public facilities?

Less Than Significant Impact. The Project includes mini-warehouse and retail uses. Employees generated by the proposed uses would not typically enjoy long periods of time during the workday to visit libraries, and they would be more likely to use libraries near their homes during non-work hours. In addition, it is likely that Project employees would have individual access to internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[94],[95] As the Project includes commercial and mini warehouse

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

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

uses, it would not result in additional demand for library facilities, and this impact would be less than significant.

Cumulative Impacts

Similar to the Project, the related projects include commercial uses that would not result in any direct demand for libraries, as they would not generate a residential population that would result in additional demand for library facilities. Therefore, cumulative impacts to library facilities would be less than significant.

XVI. RECREATION

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

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

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

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

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

Cumulative Impacts

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

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

G-1 Transportation Technical Memorandum, Raju Associates, Inc., January 31, 2024.

G-2 Transportation Assessment Letter, Los Angeles Department of Transportation, February 13, 2024.

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

Less Than Significant Impact. The Project would not conflict with the relevant City plans, policies, and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project will not conflict with any plans or policies that govern the public right-of-way, such as the Los Angeles Department of Transportation's (LADOT) Manual of Policy and Procedures (MPP) Section 321, Driveway Design, Mobility Plan 2035, and the Citywide Design Guidelines – Guideline 2. The Project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS. Additionally, the Project is consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, Mobility Plan 2035, and the Palms – Mar Vista – Del Rey Community Plan. Furthermore, as stated below, the Project is consistent with the City's VMT goals.

The Project would provide the roadway required dedication to meet the City's street design policies as expressed in the Mobility Element of the General Plan (Mobility Plan 2035) and would

not conflict with the Mobility Plan 2035. The Project is consistent with polices in the Mobility Plan 2035, including the following:

- **Mobility Plan 2035 Policy 2.1** – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

- **Mobility Plan 2035 Policy 2.3** – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

- **Mobility Plan 2035 Policy 3.2** – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

- **Mobility Plan 2035 Policy 2.10** – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.

- **Mobility Plan 2035 Program PL.1** – Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

The Project's consistency with these policies ensures no conflict with the Mobility Plan.

Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant.

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

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

On September 27, 2013, Governor Brown signed SB 743. Under SB 743, the focus of transportation analysis pursuant to CEQA shifts from driver delay, or Level of Service (LOS), to reduction in VMT, reduction in GHG emissions, creation of multimodal networks, and promotion of mixed-use developments. In December 2018, the California Natural Resources Agency certified and adopted amendments to the CEQA Guidelines implementing SB 743 with a target implementation date of July 1, 2020. City staff presented the CEQA Appendix G environmental checklist update to the City Council, which led to the adoption of new VMT-based significance

thresholds and its subsequent incorporation into the City's CEQA Threshold Guide. In the course of this update, LADOT has developed a VMT Calculator tool to "screen" projects to determine if a VMT analysis is required, and if so, then to estimate project specific daily household VMT per capita and daily work VMT per employee for land use development projects. This tool is intended to be used for the development projects within the City, and the VMT methodology is tailored to the Transportation Assessment Guidelines (TAG).

A copy of the completed VMT screening analysis worksheets are contained in Appendix G-1 of this IS/MND. As shown therein, the Project is estimated to result in a net total of approximately 101 daily trips. Based on the results using the City's VMT Calculator, a formal VMT assessment is not required to be performed because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG. Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and the Project's transportation impacts related to VMT would be less than significant.

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

Construction

During construction, the Project would not substantially increase hazards due to a geometric design feature, and vehicular access would be maintained via the existing driveway on Jefferson Boulevard. LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. Compliance with LADOT's requirement for a worksite traffic control plan would ensure that impacts are less than significant.

Operation

The Project would not substantially increase hazards due to a geometric design feature. Vehicular access to the Project Site would continue to be provided via the existing driveway on Jefferson Boulevard. The Project will not add or shift any driveways. The Project Site driveway meets the standards set forth by LADOT and the Bureau of Engineering (BOE), and therefore, this impact would be less than significant.

d. Result in inadequate emergency access?

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

Cumulative Impacts

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

As described above, a formal VMT assessment is not required to be performed for the Project because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG, and the Project's transportation impacts related to VMT were determined to be less than significant. As identified in the TAG, development projects that do not exhibit significant VMT impacts are considered to align with the long-term VMT and greenhouse gas reduction goals of both the City and regional

SCAG transportation plans. Therefore, since the Project itself does not result in VMT impacts, it is also deemed to have a less than significant cumulative VMT impact.

Pursuant to the TAG, the potential for cumulative impacts related to hazardous design features should be determined by reviewing project site access plans for cumulative development projects with access points proposed along the same block(s) as a proposed project. None of the related projects are located on the same block as the Project. Therefore, there would be no cumulative impacts related to substantially increasing hazards due to geometric design features or incompatible uses, and this impact would be less than significant.

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

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

C Cultural Resources Inventory, PaleoWest Archaeology, March 7, 2019.

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

No Impact. As discussed above, the existing building on the Project Site is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, the existing building was not identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review. Therefore, the existing building would not be

considered a tribal cultural resource as defined in Public Resources Code Section 21074, and no impact would occur.

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

Less Than Significant with Mitigation Incorporated. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

The Project has complied with all required notification and consultation under AB 52. Under AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

On April 9, 2024, the City mailed notices to the following contacts listed on the City's AB 52 Native American Heritage Commission Tribal Consultation List:

1. Fernandeño Tataviam Band of Mission Indians
2. Gabrieleño Band of Mission Indians – Kizh Nation
3. Gabrielino/Tongva San Gabriel Band of Mission Indians
4. Gabrielino Tongva Indians of California Tribal Council
5. Gabrielino/Tongva Nation
6. Gabrielino-Tongva Tribe
7. San Fernando Band of Mission Indians
8. Soboba Band of Luiseño Indians
9. Torres Martinez Desert Cahuilla Indians

The notice provided a 30-day period in which any of the tribal contacts could request consultation with the City concerning tribal cultural resources that may be impacted by the Project. On May 10, 2024, the City received one request for Native American tribal consultation from Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe). On May 17, 2024, the City and Tribe officially began the consultation process, which continued until October 2, 2024, when the City sent an email documenting completion of consultation.

According to the cultural resources inventory included in Appendix C of this IS/MND, there are no known archaeological sites or built-environment resources on the Project Site or within a quarter-mile radius, and the Project Site is located within an urbanized area that has been subject to grading and development in the past. However, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the Project Site to determine whether the NAHC has any knowledge of Native American cultural resources within the immediate vicinity of the Project area. The NAHC responded with positive results, which indicate the possible presence of a cultural resource of significance to a California Native American tribe. (See Appendix C of this IS/MND for results of the SLF search.)

Based on the results of tribal consultation and the SLF search, the Project would implement Mitigation Measure MM-TRIBAL-1, provided below, regarding the discovery and handling of any potential resources. With implementation of MM-TRIBAL-1, impacts with respect to tribal cultural resources would be less than significant.

Mitigation Measure

MM-TRIBAL-1 **Monitor Retention.** Prior to commencing any Ground Disturbance Activities (as defined below) at the Project site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include excavating, digging, trenching, grading, or a similar activity at the Project site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). The Applicant, or its successor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the

commencement of any Ground Disturbance Activities, or the issuance of any permit necessary to commence a Ground Disturbance Activity.

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

On-Site Monitoring. The tribal monitor shall observe all Ground Disturbance Activities on the Project site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project site, the tribal monitor shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbance Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant and/or the City upon request to the Tribe. If any Project scheduled activities require the tribal monitor(s) to leave the Project site for a period of time and return, confirmation shall be submitted to the Tribe by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days’ notice (if possible) shall be submitted to the Tribe by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to all Ground Disturbance Activities are completed; or 2) the Tribe provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be a tribal cultural resource are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be at least 25 feet or otherwise determined by the tribal monitor pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. at least 25 feet or otherwise determined by the tribal monitor) until the find can be assessed by the tribal monitor.

2. If the tribal monitor determines the resources are Native American in origin, the tribal monitor will recommend steps for treatment of all discovered tribal cultural resources such as, but not limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the tribal monitor to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university or museum with a research interest in the materials.

3. The Applicant, or its successor, shall implement the Tribe's treatment recommendations if the tribal monitor concludes that the Tribe's recommendations are reasonable and feasible.

4. In addition to any treatment recommendations pursuant to the above, the tribal monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been

reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

6. 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 City of Los Angeles Department of City Planning, Central Project Planning Division, the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 7927.000, and handled in compliance with the City's AB 52 Confidentiality Protocols.

8. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(a), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project would implement Mitigation Measure MM-TRIBAL-1 to ensure that its

impacts with respect to tribal cultural resources are less than significant. The related projects would be assessed for the potential to encounter tribal cultural resources, and if necessary, would implement mitigation measures similar to the Project. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

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

Water

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by the Los Angeles Department of Water and Power (LADWP). As shown on Table XIX-1, the Project would consume an increase of approximately 1,884 gallons of water per day (gpd).

Table XIX-1
Estimated Wastewater Generation and Water Consumption[1]

Land Use	Size	Water Consumption Rate/Wastewater Generation Rate[2]	Total (gallons/day)
Mini-warehouse	78,365 sf	20 gpd/1,000 sf	1,567
Retail	3,959 sf	80 gpd/1,000 sf	317
		Total	**1,884**

sf = square feet gpd = gallons per day
1 Conservatively assumes that all water converts to wastewater.
2 Source: City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Engineering Services Division, Sewer Generation Factors, April 6, 2012.

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

Cumulative Impacts

Implementation of the Project in conjunction with the related projects could result in an increased impact on water conveyance infrastructure. It should be noted that the estimated water demand calculated above for the Project does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code. As with the Project, the related projects would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirements for fire flow and other

fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. As identified on Table XIX-1, above, the Project would generate an increase of approximately 1,884 gallons of wastewater per day. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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

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

If the public sewer lacks sufficient capacity, the Project would be required to build sewer lines to a point in the sewer system with sufficient capacity. Potential sewer infrastructure upgrades would not be expected to create a significant impact to the physical environment as installation of any

upgrades would primarily involve trenching within the affected streets and within areas that have already been significantly disturbed. The Project would secure any necessary permits from the Department of Public Works and would comply with all standard City requirements during construction, as described above. Therefore, Project impacts related to the construction or relocation of new facilities associated with wastewater infrastructure would be less than significant.

Cumulative Impacts

Implementation of the Project combined with the related projects in the area could increase the need for wastewater treatment. As with the Project, the related projects would be subject to review by the Bureau of Sanitation to ensure that existing infrastructure would be adequate to meet the requirements for each project. All development in the City is subject to City requirements regarding potential infrastructure improvements need to meet respective wastewater infrastructure needs. Further, with a remaining treatment capacity of approximately 88 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development, and no new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage

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

Cumulative Impacts

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

Electrical Power

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

Cumulative Impacts

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

Natural Gas

As discussed in response to Checklist Question VI(a) and (b) (Energy), the Project would not use any natural gas and therefore would not result in any impact with respect to natural gas facilities.

Cumulative Impacts

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

Telecommunications

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

Cumulative Impacts

Like the Project, the related projects represent infill development served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities as they are of similar scale as the Project and located in an area served by existing utilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

As shown on Table XIX-1, above, the Project would consume a net increase of approximately 1,884 gallons of water per day. As concluded in LADWP's 2020 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an average year, single dry year, and multiple dry year in each year from 2025 to 2045. LADWP's 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021.[96] As such, the Project would not require new or additional water supply or entitlements, and impacts related to water supply would be less than significant.

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

Cumulative Impacts

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

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

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

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

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals.

The landfills that serve the City and the capacity of these landfills are shown in Table XIX-2, below. As shown, the landfills have an approximate available daily intake of 13,886 tons.

Table XIX-2
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	2019 Average Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	13	10.18	3,600	2,785	815
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Lancaster	81	9.89	3,000	395	2,605
Sunshine Canyon	17	54.01	12,100	7,420	4,580
				Total	**13,886**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2021 Annual Report, December 2022.

Construction

As shown in Table XIX-3, the Project would result in approximately 165 tons of construction waste over the entirety of the construction period, not accounting for any mandatory recycling. Pursuant to the requirements of Senate Bill 1374[97], the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Given the remaining permitted capacity of the landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table XIX-3
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Construction Waste			
Non-residential	82,324 sf	4.02 pounds / sf	165
		Total	**165**

Over the entire total schedule of construction.
sf = square feet, 1 ton = 2,000 pounds
Based on 4.02 pounds of nonresidential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf).

[97] https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374

Operation

The trash and recycling bins included as part of the Project would be locked and only available to the mini-warehouse and retail employees. Nevertheless, the Project's estimated solid waste generation has been conservatively estimated to include both the retail and mini-warehouse uses. As shown on Table XIX-4, the Project would generate approximately 412 pounds (0.21 tons) of solid waste per day. This total is conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. These regulations include AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide, with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[98]

With a remaining daily intake capacity of approximately 13,886 tons of solid waste per day, the four Class III landfills serving the City that accept commercial solid waste could accommodate the Project's increase of approximately 0.21 tons of solid waste per day. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Therefore, Project impacts related to solid waste would be less than significant.

Table XIX-4
Estimated Solid Waste Generation

Land Use	Size	Generation Rate[1]	Total (lbs)
Mini-warehouse	78,365 sf	5 lbs/1,000 sf	392
Retail	3,959 sf	5 lbs/day/1,000 sf	20
		Total	**412**

lbs = pounds sf = square feet
[1] Source: CalRecycle website: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates.
Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

Cumulative Impacts

The Project in combination with the related projects would generate additional solid waste. As shown in Table XIX-2, above, the landfills serving the City have an approximate available daily intake of 13,886 tons. Therefore, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. Similar to the Project, the related projects would be required by the City to participate in regional source reduction and recycling programs pursuant to AB 939, which would further reduce the amount of solid waste to be disposed of at the landfills. Thus, cumulative development would not create the

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

need for new or expanded landfills, and cumulative impacts with respect to solid waste service would be less than significant.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur.

Cumulative Impacts

All development in the City, including the Project and the related projects, would be required to comply with the City's recycling programs and federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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 not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[99] Therefore, no impact would occur.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[100] In addition, the Project Site is flat and is not located in a hillside zone. Therefore, no impact would occur.

[99] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

[100] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[101] Therefore, no impact would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[102] Therefore, no impact would occur.

Cumulative Impacts

The Project vicinity, including the Project Site and the sites of the related projects, is not within or near a very high fire severity zone, and the Project would not result in any impacts related to wildfire. Therefore, no cumulative impacts related to wildfire would occur.

[101] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

[102] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. As discussed under Checklist Topic IV (Biological Resources), the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed under Checklist Topic XVIII (Tribal Cultural Resources), with implementation of mitigation, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources. Therefore, these impacts would be less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. Based on the analysis contained in this IS/MND, the Project's contribution to cumulative impacts would not be considerable.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact could occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the analysis contained in this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings, and all Project impacts would be less than significant.