



Initial Study & Mitigated Negative Declaration Public Storage Jefferson Replacement Project

Case Number: ENV-2023-2110-MND

Project Location: 5741 West Jefferson Boulevard and 3336, 3348, 3352 South La Cienega Place, Los Angeles, California 90016.

Community Plan Area: West Adams - Baldwin Hills - Leimert

Council District: CD 10 - Heather Hutt

Project Description: The Project Site is an approximately 87,009 square-foot lot (post-dedication) that is developed with approximately 82,051 square feet of existing self-storage use and associated parking. The proposed replacement Project would involve the construction of a mixed-use six-story 303,453 square foot building with approximately 296,733 square feet of self storage use floor area and 6,720 square feet of retail use floor area. The Project will demolish four existing one-story and two-story self-storage buildings. The Project proposes a Floor Area Ratio of 3.49:1 and 85 feet and 8 inches in building height. The Project proposes a total of 63 automobile parking spaces, 33 long-term bicycle parking spaces, and 33 short-term bicycle parking spaces. The Project proposes a total of 20,913 square feet of open space.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Meridian Consultants LLC

APPLICANT:

Public Storage

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1 INTRODUCTION

An application for a proposed project referred to as the Public Storage Jefferson Replacement Project (“Project”) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study (IS) is required.

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; 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) is a preliminary analysis, conducted by the Lead Agency, of the potential environmental effects that could result from the construction, implementation, and operation of a project, to determine whether there is substantial evidence that a project may have a significant effect on the environment. The IS is intended as an informational document and is ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 INITIAL STUDY PROCESS

This IS has been prepared in accordance with CEQA (Public *Resources* Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document.

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 nor Mitigated Negative Declaration is appropriate, an EIR is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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 SUMMARY

PROJECT TITLE:	Public Storage Jefferson Replacement Project
ENVIRONMENTAL CASE NUMBER:	ENV-2023-2110-MND
RELATED CASES:	CPC-2023-2109-HD-SP-ZV-SPR

PROJECT LOCATION:	5741 West Jefferson Boulevard and 3336, 3348, and 3352 South La Cienega Place Los Angeles, CA 90016
COMMUNITY PLAN AREA:	West Adams – Baldwin Hills - Leimert
GENERAL PLAN DESIGNATION:	Limited Industrial
ZONING:	MR1-1VL-CPIO
COUNCIL DISTRICT:	CD 10 - Heather Hutt

LEAD CITY AGENCY:	City of Los Angeles
CITY DEPARTMENT:	Department of City Planning
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Isaiah Ross, City Planning Associate
PRINTED NAME, TITLE

February 6, 2026
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) 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.
- 6) 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.
- 7) 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.
- 8) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 9) 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.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The proposed replacement Project would involve the construction of a six-story building with approximately 296,733 square feet of self storage use floor area and 6,720 square feet of retail use floor area, replacing approximately 82,051 square feet of existing self storage on a 90,958 square foot Project Site. The Project includes a total of approximately 315,417 gross square feet. The Replacement Project includes parking for 63 automobiles, including 10 electric vehicle (EV) spaces and 14 EV capable spaces, and 66 bicycles, including 33 long term and 33 short-term spaces. . The Project would be approximately 85 feet and 8 inches in height.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The addresses associated with the Project Site include 5741 W. Jefferson Boulevard and 3336, 3348 and 3352 S La Cienega Place. The Project is located within the West Adams - Baldwin Hills – Leimert Community Plan Area of the City of Los Angeles. The Project Site is approximately 100 feet north of the Los Angeles County Metropolitan Transportation Authority E (Expo) Line, which runs in an east–west direction, and 0.6 miles south of the Santa Monica Freeway (I-10), which runs in an east–west direction, as shown in **Figure 1: Regional Location Map**. The south side of the Project Site is bordered by West Jefferson Boulevard and La Cienega Place is on the west of the Project Site, as shown in **Figure 2: Project Site Location**.

3.2.2 Existing Conditions

The Project Site consists of one lot that is associated with Assessor Parcel Number 4205-033-014. The Project Site is approximately 90,958 square feet (approximately 2.09 gross acres) in Lot area and contains an existing approximately 82,051 square feet, 1-story and 2-story Public Storage self storage facility, and a surface parking lot, as shown in the photographs featured in **Figure 3: Existing Conditions**.

The Project Site is located in an industrial, commercial, and residential area of Los Angeles. The Project Site is within the West Adams–Baldwin Hills–Leimert Community Plan area and is designated as Limited Industrial, as shown in **Figure 4: West Adams–Baldwin Hills–Leimert Community Plan Map**. The site is zoned MR1-1VL-CPIO, a Restricted Industrial use zone within Height District 1 and within the West Adams - Baldwin Hills - Leimert Community Plan Implementation Overlay District.

3.2.3 Surrounding Land Uses

North: To the north of the Project Site are commercial office uses, industrial uses, retail uses and associated parking lots in the MR1-1VL-CPIO zone.

East: To the east of the Project Site is the Cumulus mixed-use development containing residential uses and a Whole Foods grocery store in the (T)(Q)C2-2D-CPIO and [T][Q] C2-2D zones.

South: To the south of the Project Site is the Metro E (Expo) Line as well as commercial office uses, industrial uses, a multifamily development, and associated parking lots and structures in the PF-1, (T)(Q)M1-2D-CPIO, MR1-1VL-CPIO, MR1-1VL, and CM-2D-CPIO zones.

West: To the west of the Project Site are commercial office uses, industrial uses, and retail uses in the MR1-1VL-CPIO zone.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project involves the demolition of six existing one- and two-story buildings that total approximately 82,051 square feet of self-storage space, and the construction of a new six-story building containing approximately 6,720 square feet of street facing retail use floor area and 296,733 square feet of self storage use floor area, as shown in **Figure 5: Site Plan**.

3.3.2 Design and Architecture

The proposed Project would be approximately 85 feet and 8 inches in height, as shown by **Figure 7: Elevations**, with limited exceptions of up to 10' for mechanical equipment, stairways, and elevator tower structures.¹

The Project is designed to complement the scale, massing, and character of surrounding development. The proposed building has been designed for this specific location, characterized by a modern architectural style featuring signage, lighting, and landscaping that complements neighboring buildings along Jefferson Boulevard.

The upper levels of the façade present a visually striking composition along Jefferson Boulevard, with an interplay of massing, texture, and transparency. Through use of textured walls, geometric color compositions, and strategic placement of glazing, the design is dynamic and refined. Building materials include metal paneling in horizontal and vertical bands of different widths in orange, gray and tan, concrete masonry block, and clear and spandrel glazing.

At the ground level, the porous design, featuring extensive glazing and strategically painted canopies, offers a welcoming and transparent connection between the building and the public sidewalk. This openness encourages engagement and interaction, allowing the structure to serve as an active urban contributor rather than a passive presence, consistent with the City's goals for the Jefferson/La Cienega TOD Subarea.

3.3.3 Open Space and Landscaping

There are six non-protected trees on the site. These would be removed and replaced with 28 new trees located around the perimeter of the site.

¹ Additional height allowed per LAMC Section 12.21.1.B.3 and CPIO Section V-2(A)(1).

3.3.4 Access, Circulation, and Parking

The Project includes parking for approximately 63 automobiles, including 10 electric vehicle (EV) spaces and 14 EV capable spaces, and 66 bicycles, including 33 long term and 33 short-term spaces. The Project Site is located within a Transit Priority Area (TPA), an area within one-half mile of a major transit stop. For this reason, the proposed Project qualifies for zero required parking pursuant to Assembly Bill (AB) 2097.

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10), which runs in an east–west direction approximately 0.6 miles north of the Project Site. Local street access is provided by West Jefferson Boulevard, which runs in an east–west direction along the south side of the Project Site. Public transit is provided to the surrounding area by the Los Angeles County Metropolitan Transportation Authority (Metro), with the E (Expo) Line La Cienega/Jefferson Station approximately 800 feet east of the Project Site. East of the Project Site, the 4 Culver City Bus line and the 105 Metro bus line stop on La Cienega Boulevard at the northbound and southbound La Cienega Boulevard/Jefferson Boulevard bus stop. Additionally, the 38 and 217 Metro bus lines and the Los Angeles County Link Baldwin Hills Parklands Line all stop on Jefferson Boulevard at the eastbound and northbound La Cienega Boulevard/Jefferson Boulevard bus stop.

3.3.5 Anticipated Construction Schedule

Project construction is expected to take approximately 16 months and be completed by late 2028.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requested permits and approvals. The Initial Study analyzes the potential 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 LAMC Section 12.32, a Height District Change to permit a change from Height District 1VL to Height District 2 to permit development of the Project Site to the proposed FAR of 3.49:1.
- Pursuant to LAMC Section 12.32, a CPIO Amendment to permit a FAR of 3.49:1, to increase the allowable height to approximately 86 feet; to permit the existing storage use within one-half mile of another mini-storage facility; and to allow driveways closer than 200 feet.
- Pursuant to LAMC Section 12.27, a Use Variance to allow a mixed-use self storage facility with ground-floor retail in the MR1 zone.
- Pursuant to LAMC Section 16.05, a Site Plan Review to permit the development of a new six-story mixed-use retail and self storage building consisting of approximately 303,453 square feet.
- Pursuant to LAMC Section 12.32, a CPIO Clearance to permit the development of a new six-story mixed-use retail and self storage building consisting of approximately 303,453 square feet in the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay Zone.

- 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, 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

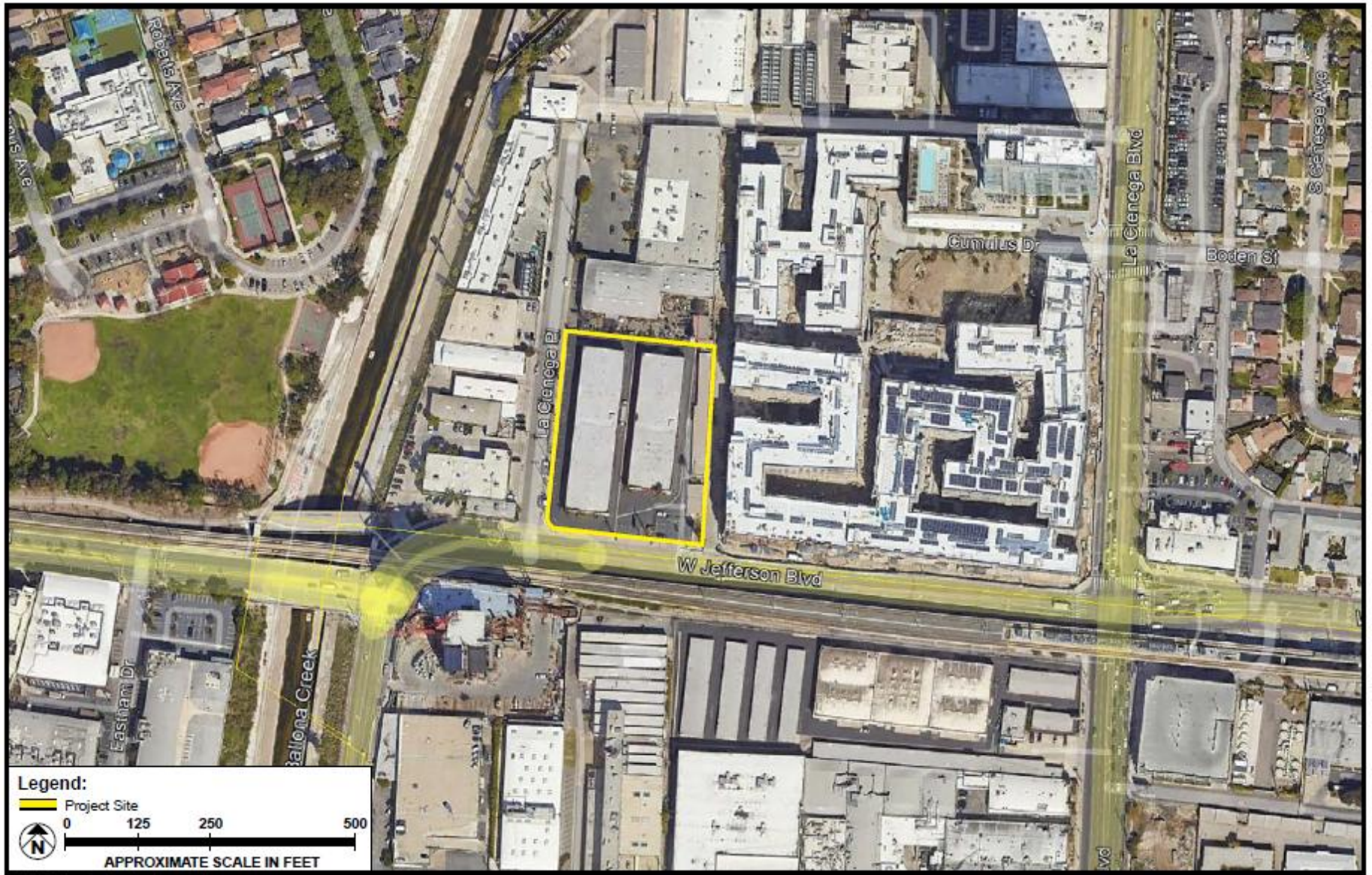


FIGURE 2



Project Site Location



View 1



View 2



View 3



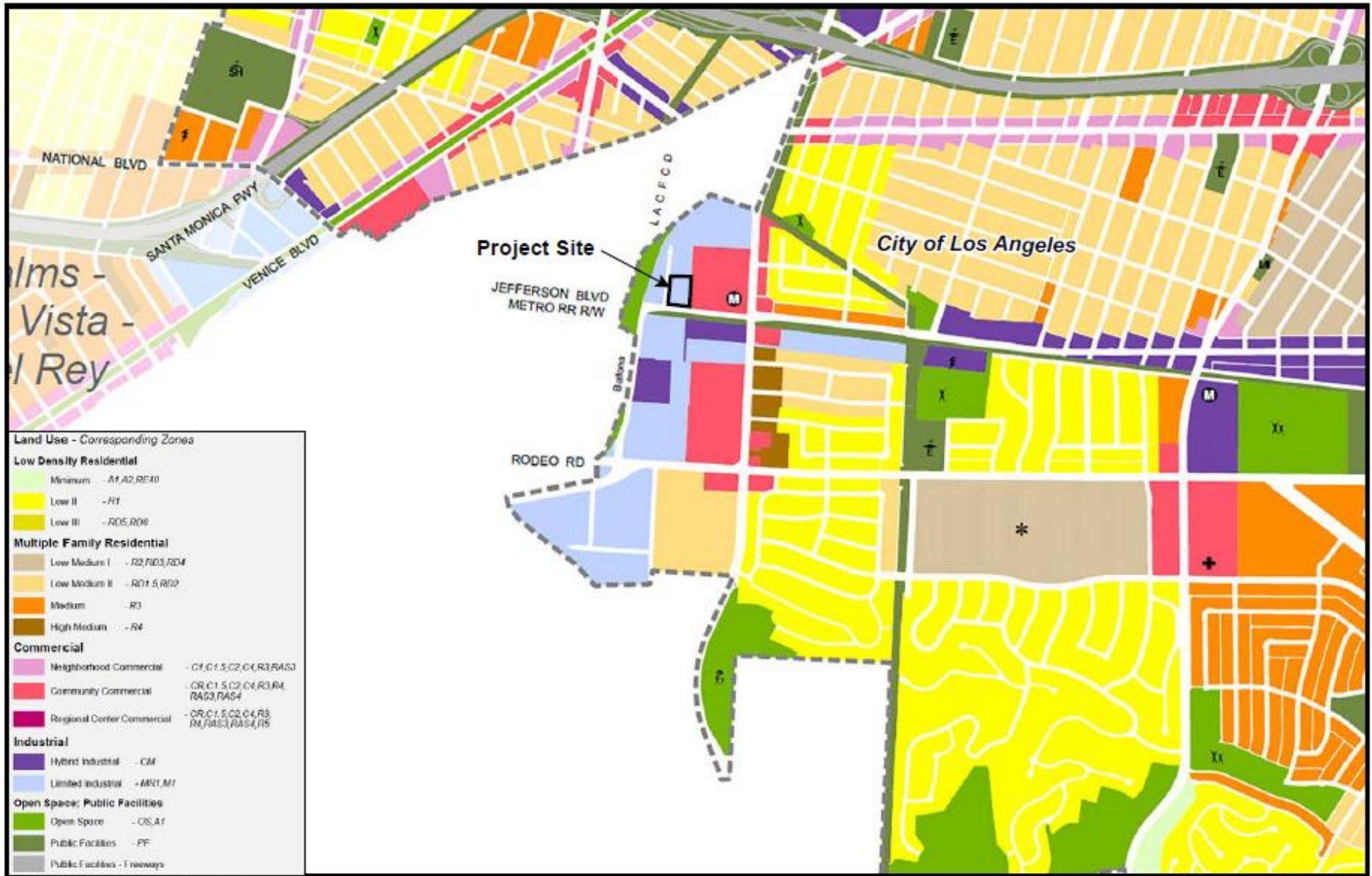
View 4

SOURCE: Google Earth - 2023

FIGURE 3

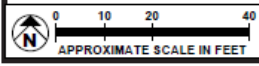
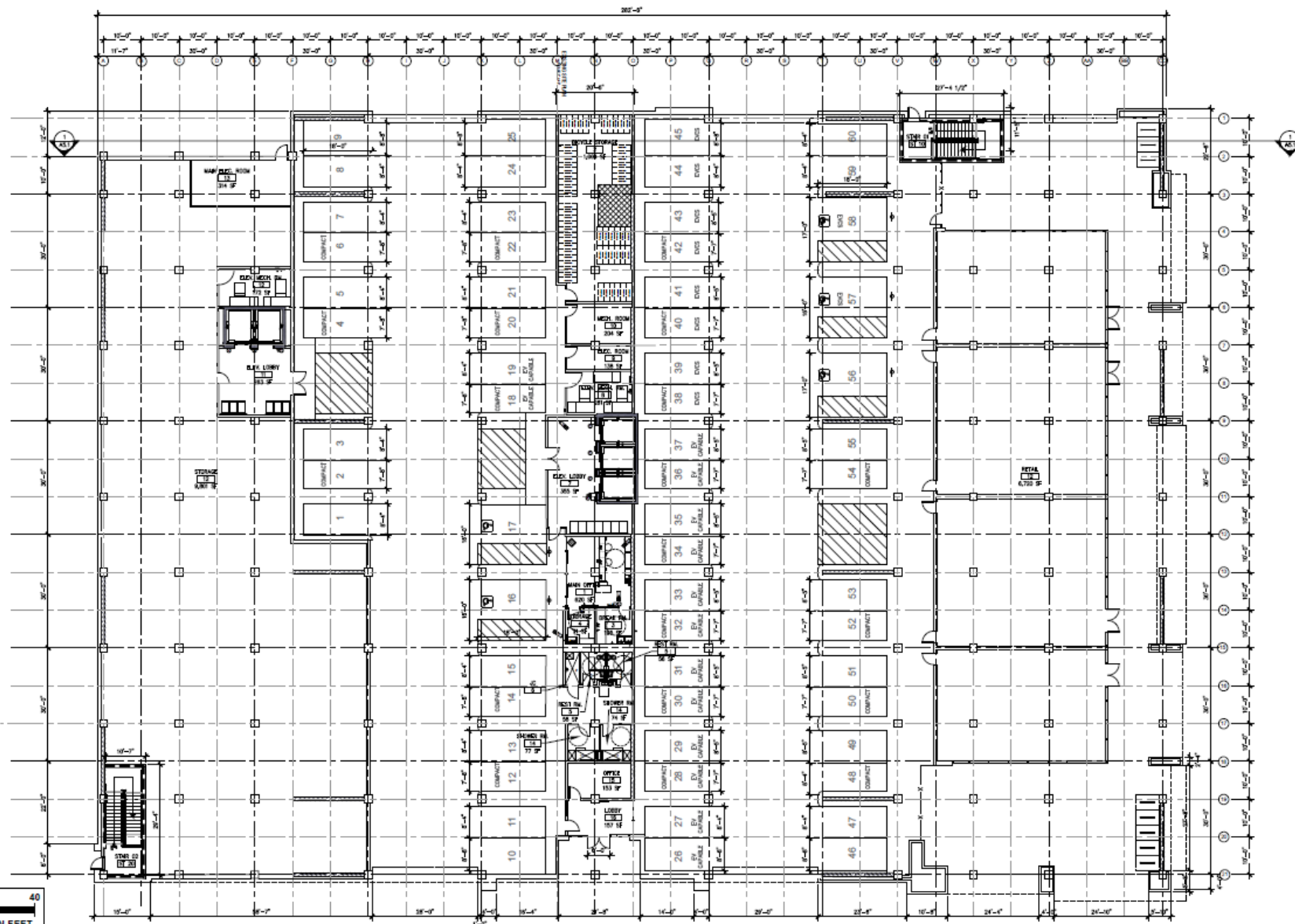


Existing Conditions



SOURCE: City of Los Angeles - 2022

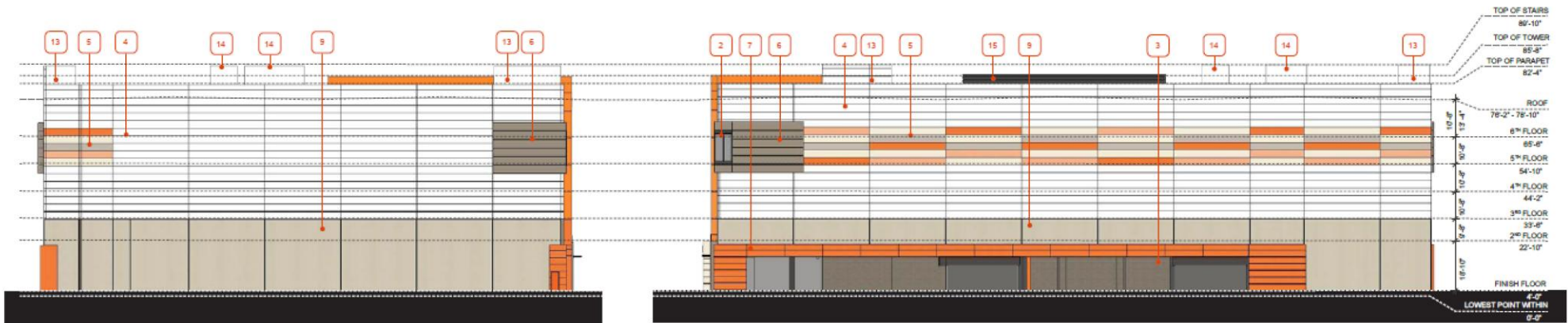
FIGURE 4



SOURCE: WARE MALCOMB - 2025

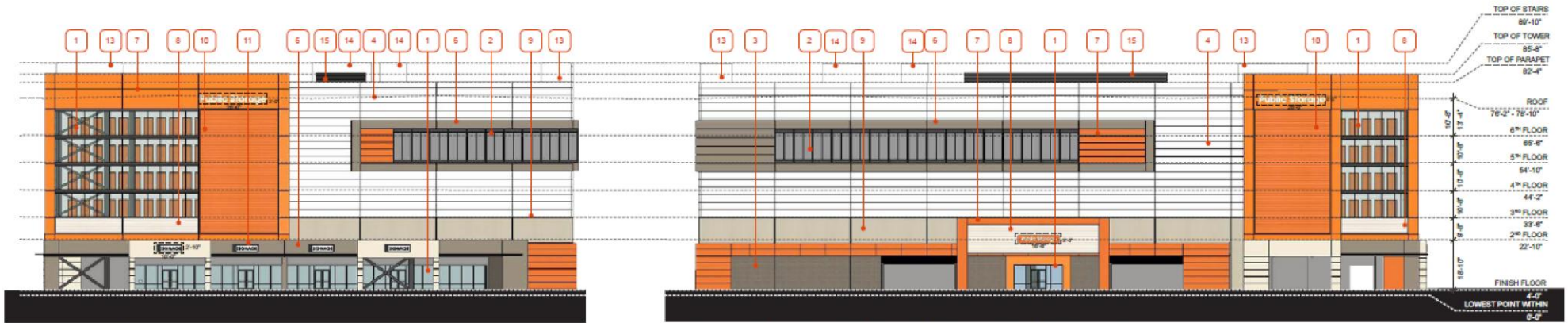
FIGURE 6





EXTERIOR ELEVATION - NORTH
SCALE: 1/16" = 1'-0"

EXTERIOR ELEVATION - EAST
SCALE: 1/16" = 1'-0"



EXTERIOR ELEVATION - SOUTH (W JEFFERSON BLVD)
SCALE: 1/16" = 1'-0"

EXTERIOR ELEVATION - WEST (LA CIENEGA PLACE)
SCALE: 1/16" = 1'-0"

SOURCE: WARE MALCOMB - 2025

7: Elevations

FIGURE 7

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	--	------------------------------	-----------

Except as provided in Public Resources Code Section 21099 would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less than Significant Impact. A significant impact could occur if the Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially obstruct available public views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). There are no identified or designated scenic vistas within the area the Project Site is located in. The existing level of development in the surrounding area obstructs long range views from Jefferson Boulevard and other public viewpoints in the area the Project Site is located in. For these reasons, the Project would not result in a substantial adverse effect on a scenic vista. Impacts would be less than significant and no mitigation is required.

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

No Impact. The Project Site is developed with an existing self storage facility and does not contain any scenic resources. The Project Site is neither adjacent to a State-designated scenic highway.² The nearest officially designated State Scenic Highway is State Route 27, Topanga Canyon Boulevard, located approximately 12 miles west of the Project Site. As such, no impacts would occur, and no mitigation is required.

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

Less than Significant Impact. The Project Site is located in an urbanized area. The Project will change the existing visual character of the Project Site, but this change will not degrade the existing visual character of the site or the surrounding area as visible from public vantage points. The Project Site contains an existing self storage facility located on a major street, Jefferson Boulevard, in an urbanized area, and the primary public vantage points of the Project Site are from Jefferson Boulevard. An existing open metal fence is located along the sidewalk adjacent to the site on Jefferson Boulevard and La Cienega Place. A surface parking area is located between the existing self storage buildings and Jefferson Boulevard. The Project would include the demolition of the existing self storage buildings and construction of a new mixed-use 296,733 square-foot self storage facility and all new site improvements and landscaping. The proposed new building would be approximately 85 feet and 8 inches in height and will be taller than the existing buildings on the Project Site, contains ground-floor retail commercial space with storefront glass located closer to Jefferson Boulevard, includes a larger landscape setback than the existing facility along Jefferson Boulevard and La Cienega Place and will not be separated from the sidewalk by a fence or other barrier. The height of the proposed building and the design of the frontage along Jefferson Boulevard are consistent with the design of the existing mixed-use residential building located immediately east of the Project Site on Jefferson Boulevard. The proposed building would be comparable in height to existing and under construction buildings immediately east and south of the Project Site. The proposed height is consistent with the underlying zoning regulations of the proposed MR1-2 zone. The Project does not conflict with applicable zoning regulations, and there are no other applicable regulations governing scenic quality. The impact of the Project on the visual character of the area will be less than significant and no mitigation is required.

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

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

2 California Department of Transportation (Caltrans), "California Scenic Highway Mapping System," <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

or freeways. Daytime glare is typically associated with mid- to high-rise buildings with facades largely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting in existing low ambient light conditions. The Project involves neither of these conditions. The Project would include nighttime security lighting that would be shielded from adjacent properties and would not substantially change existing ambient nighttime lighting conditions. Overall, the level of existing light and glare associated with the Project Site and surrounding uses is typical of the existing urban context and subject to applicable regulations contained within the LAMC. Therefore, impacts related to light or glare would be less than significant, and no mitigation is required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. The Project Site is located within a developed and urbanized area of the City. The Project Site is fully improved and contains an existing approximately 82,051 square-foot, 1-story and 2-story Public Storage self storage facility, and a surface parking lot. No farmland or agricultural activity exists on or near the Project Site. No portion of the Project Site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance.³ As such, no impacts would occur, and no mitigation is required.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the LAMC. The Project Site has a land use designation of Limited Industrial and is zoned MR1-1VL-CPIO, an Industrial zone that permits a wide range of industrial, storage, and limited commercial and manufacturing uses. As such, the Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁴ As such, no impacts would occur, and no mitigation is required.

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

No Impact. As mentioned previously, the Project Site has a land use designation of Limited Industrial and is zoned for a wide range of industrial, storage, and limited commercial and manufacturing uses. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. As such, no impacts would occur, and no mitigation is required.

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

No Impact. The Project Site is not designated or zoned for forest or timberland or used for foresting. Additionally, the Project Site is located in an urbanized area of the City and is not within any forestland area. As such, no impacts would occur, and no mitigation is required.

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

No Impact. Neither the Project Site nor nearby properties are currently utilized for agricultural, or forestry uses. The Project Site is not classified in any “Farmland” category designated by the State

³ California Department of Conservation (CDC), Division of Land Resource Protection, California Important Farmland Finder, accessed June 2023. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

⁴ CDC, Division of Land Resource Protection, “The Land Conservation (Williamson) Act” (2013), <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>.

of California. As such, no impacts would occur, and no mitigation is required.

III. AIR QUALITY

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

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

The conclusions of this section are based on the findings of the Air Quality Study that is included as **Appendix A** to this IS.

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

Less than Significant Impact. At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley. To meet the air quality standards, regional plans are developed, including the SCAQMD's updated air quality management plan (AQMP) that was adopted in December 2022.⁵ The Final 2022 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments; accommodate growth; reduce pollutants in the Basin; meet federal and State air quality standards; and minimize the fiscal impact of pollution control measures on the local economy. It builds on approaches in the previous AQMP to achieve attainment of the federal ozone air quality standard. These planning efforts have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Projects that are considered consistent with the applicable AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects,

5 SCAQMD, Final 2022 Air Quality Management Plan (2022), <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf>. Accessed June 2023.

uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. 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, which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts.⁶ Determining whether or not a project exceeds SCAG's growth forecasts involves the evaluation of the following: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

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. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These growth forecasts are based on local plans and policies applicable to the specific area. According to SCAG estimates, the 2018 population within Los Angeles County was 10,283,729.⁷ The population is projected to grow to 11,674,000 by 2045.⁸ The Project would not result in population and housing growth that would cause growth in the City to exceed the SCAG forecast because the Project does not include the development of residential uses. SCAG also estimates that the number of jobs in the transportation and warehouse industry in the SCAG region would increase from 382,000 jobs in 2016 to 522,000 jobs in 2045.⁹ Additionally, the Project would not exceed employment growth projections as the West Adams-Baldwin Hills-Leimert Community Plan estimates employment based on the SCAG forecast. The Community Plan projects employment in the area will increase from 44,779 in 2008 to 53,556 in 2030.¹⁰ The Project will generate approximately 9 new retail commercial jobs and the replacement of the existing self storage facility with the new 296,733 square-foot self storage facility will only generate one additional job for a total of 16 total employees, 13 retail and 3 mini-facility warehouse.¹¹ The Project is consistent with

6 Southern California Association of Governments (SCAG), Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed June 2023.

7 Southern California Association of Governments (SCAG), Profile of Los Angeles County, <https://scag.ca.gov/sites/main/files/file-attachments/losangelescountypdf?1605653130>. Accessed July 2023.

8 Southern California Association of Governments (SCAG), Demographics and Growth Forecast, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed July 2023.

9 Southern California Association of Governments (SCAG), Demographics and Growth Forecast, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed July 2023.

10 City of Los Angeles, Department of City Planning, Community Plans, West Adams-Baldwin Hills-Leimert Community Plan, accessed June 14, 2023. https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf.

11 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf. Accessed September 2023.

current land use designations as described in the West Adams-Baldwin Hills-Leimert Community Plan and would not generate employment growth beyond the RTP/SCS employment projections.

Additionally, the Basin is currently designated as nonattainment at the federal level for ozone and PM_{2.5}; and at the State level for ozone, PM₁₀, and PM_{2.5}. SCAQMD developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin. As discussed further in **Table III-1** and **Table III-2** below, air quality emissions associated with construction and operation of the Project would not exceed SCAQMD thresholds for regional emissions. As such, the Project is consistent with the growth assumptions in the regional air plan and would not contribute to air quality violations in the Basin. Impacts would be less than significant.

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?

Less than Significant Impact. A significant impact could occur if the proposed Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Basin is currently in State nonattainment for O₃, PM₁₀, and PM_{2.5}.¹² In regard to determining the significance of the proposed Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple related projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."¹³ Therefore, if a project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. **Table III-1: Maximum Construction Emissions** identifies daily emissions that are estimated for peak construction days for each construction year.

Emissions presented in **Table III-1** include regulatory compliance measures such as control efficiency of PM₁₀ (dust control measures per SCAQMD Rule 403). Based on the modeling, construction of the Project would not exceed regional VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} concentration thresholds. Construction of the Project would not generate any significant environmental impacts associated with air quality compliance.

12 CARB, Area Designation Maps/State and National, <http://www.arb.ca.gov/degis/adm/adm.htm>. Accessed June 2023.

13 South Coast Air Quality Management District (SCAQMD), White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003). See **Appendix A**.

Table III-1: Maximum Construction Emissions

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
2027	2	19	21	<1	5	2
2028	65	18	32	<1	3	1
<i>Maximum</i>	<i>65</i>	<i>19</i>	<i>32</i>	<i><1</i>	<i>5</i>	<i>2</i>
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Notes: Modeling data output provided in **Appendix A: Air Quality Study, Appendix B, Table 2.2.**
 CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; SO_x = sulfur oxides; VOC = volatile organic compounds.

Operational emissions would result primarily from passenger vehicles traveling to and from the Project Site generating approximately 390 daily trips.¹⁴ The results presented in **Table III-2: Maximum Operational Emissions** are compared to the SCAQMD-established operational significance thresholds. As shown in **Table III-2**, the net operational emissions would not exceed the regional VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} concentration thresholds. Operation of the Project would not generate any significant environmental impacts associated with air quality compliance

SCAQMD has stated that if an individual project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants. The Project would not generate construction or operational emissions that exceed the SCAQMD’s recommended regional thresholds of significance and therefore the Project would not generate a cumulatively considerable increase. As such, the Project would result in less than significant impacts.

Table III-2: Maximum Operational Emissions

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
Area	10	<1	14	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	1	1	9	<1	2	1
Total	11	1	24	<1	2	1
Existing	3	1	10	<1	1	1
<i>Net Total</i>	<i>8</i>	<i>1</i>	<i>14</i>	<i><1</i>	<i>2</i>	<i>1</i>

¹⁴ Raju Associates, Inc., Transportation Assessment Study for the Public Storage Project – 5741 W. Jefferson Boulevard, September 2023. See **Appendix E**.

Table III-2: Maximum Operational Emissions

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
	pounds/day					
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Notes: Modeling data output provided in **Appendix A: Air Quality Study**, Appendix B, Table 2.5
 Totals in table may not appear to add exactly due to rounding in the computer model calculations.
 CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds

a. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities. As shown in **Figure 8: Sensitive Receptor Map**, sensitive uses near the Project Site include multi-family residential uses along Jefferson Boulevard and La Cienega Boulevard, commercial uses along Jefferson Boulevard, residential uses and a school along Ballona Creek, and residential uses along Jefferson Boulevard.

The local significance thresholds are based on SCAQMD’s Final Localized Significance Threshold (LST) Methodology (LST Methodology)¹⁵ guidance document for short-duration construction activities. The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project Site because of construction activities. The results of the LST analysis are provided in **Table III-3: Localized Construction and Operational Emissions**. These estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. Emissions presented in **Table III-3** include regulatory compliance measures such as control efficiency of PM10 (dust control measures per SCAQMD Rule 403). As shown in **Table III-3**, emissions would not exceed the localized significance construction and operational thresholds. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

15 South Coast Air Quality Management District, Final Localized Significance Threshold (LST) Methodology, (June 2003, rev. July 2008).



SOURCE: Google Earth - 2023

FIGURE 8

Meridian
Consultants

Sensitive Receptor Map

047-009-21

Table III-3: Localized Construction and Operational Emissions

Source	NOx	CO	PM10	PM2.5
	On-Site Emissions (pounds/day)			
Construction				
Total maximum emissions	15	18	3	2
LST threshold	143	2,714	6	4
Threshold Exceeded?	No	No	No	No
Operational				
Project area/energy emissions	1	15	<1	<1
LST threshold	143	2,714	2	1
Threshold Exceeded?	No	No	No	No

Notes: Modeling data output provided in **Appendix A: Air Quality Study, Appendix B, Tables 3.1-3.12.**
 Totals in table may not appear to add exactly due to rounding in the computer model calculations.
 CO = carbon monoxide; NOx = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

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

Less than Significant Impact. As shown in **Table III-3**, the construction of the proposed Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the number of VOCs in architectural coatings and solvents. According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project would not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed uses.

Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan. Impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

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

- 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 US Fish and Wildlife Service?**

Less than Significant Impact. A project could have a significant impact on biological resources if it were to result in (a) the loss of individuals, or the reduction of existing habitat of a State- or federal-listed endangered, threatened, rare, protected, candidate, or sensitive species or a

Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is developed with an existing self storage facility and landscaped area. The Project will demolish the existing self storage facility and build a new 296,733 square-foot self storage facility on the site with ground-floor retail. The existing landscaped area consists of six palm trees located in the parking lot, and one magnolia in a small, landscaped area with small shrubs and dirt. There are no trees or planted strips within the sidewalk right-of-way adjacent to the Project Site. The Project will provide seventeen new trees along the street on La Cienega Place and West Jefferson Boulevard. An additional landscape buffer will be provided along both streets.

No rare plant or animal species have been previously recorded as specifically existing on the Project Site. Due to the urbanized and previously disturbed nature of the Project Site and the surrounding areas, species likely to occur on site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat currently on the Project Site, it is unlikely any special-status species listed by the California Department of Fish and Wildlife or by the US Fish and Wildlife Service would be present on site. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Impacts would be less than significant, and no mitigation is required.

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?

No Impact. The Project site is developed with an existing storage facility. No riparian or other sensitive natural community is located on or adjacent to the Project Site. The nearest riparian habitat is Ballona Creek channel, approximately 300 feet to the west of the Project Site. The nearest sensitive natural community is the Ballona Wetlands, approximately 4.1 miles to the southwest. Intervening development physically separates the Project Site from Ballona Creek channel and the Ballona Wetlands. Furthermore, the Ballona Creek channel is channelized and completely surrounded by urban uses, including light industrial and commercial uses. Stormwater runoff from the Project Site would be captured by existing storm drains after being retained and treated by onsite features in accordance with the City's Low Impact Development (LID) Ordinance.¹⁶ As such, no impacts would occur, and no mitigation is required.

¹⁶ City of Los Angeles, Low Impact Development (LID) Ordinance, accessed June 14, 2023.
https://lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017151.pdf.

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

No Impact. The Project Site is not near, nor does it contain wetland habitat or any kind of natural or altered drainage course. The nearest riparian habitat is Ballona Creek channel, approximately 300 feet to the west of the Project Site. The nearest sensitive natural community is the Ballona Wetlands, approximately 4.1 miles to the southwest. Intervening development physically separates the Project Site from Ballona Creek channel and the Ballona Wetlands. Stormwater runoff from the Project Site would be captured by existing storm drains after being retained and treated by onsite features in accordance with the City's LID Ordinance. As such, implementation of the Project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. As such, no impacts would occur, and no mitigation is required.

- d. Interfere substantially with the movement of any 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?**

No Impact. The Project Site is located in an area that has been previously developed in an urbanized area of the City. There are no wildlife corridors or native wildlife nursery sites on or adjacent to the Project Site. As such, no impact would occur, and no mitigation is required.

- e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?**

Less than Significant Impact. The Project Site contains no protected trees and no street trees. The Project Site contains six palm trees and one magnolia, and these trees would not meet the criteria as protected under the City's Protected Tree Ordinance (Ordinance No. 186873). Removal of these trees would not conflict with the City's Protected Tree Ordinance. As such, impacts would be less than significant, and no mitigation is required.

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

No Impact. A significant impact could occur if the Project were inconsistent with the mapping or policies in any conservation plans of the types cited. The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan. No impacts would occur, and no mitigation is required.

V. CULTURAL RESOURCES

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

The conclusions of this section are based on the findings of the Cultural Resource Record Search Results that is included as **Appendix F** to this IS.

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

Less than Significant Impact. A significant impact could occur if the Project were to disturb historic resources that presently exist within the Project Site. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is (1) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

A search of California Historical Resources Information System (CHRIS) records was conducted at the South Central Coastal Information Center housed at California State University, Fullerton in August 2024 to identify any known cultural resources within and in the immediate vicinity of the Project Site. This records search included the Project Site and a 0.5-mile search area and a review of the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list,

the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search identified 23 previous investigations conducted and documented within the vicinity of the Project Site between 1936–2014. One of these studies included the Project Site and two included immediately adjacent areas. A total of 12 cultural resources were previously documented, including 4 prehistoric and 8 historic. No historical or archaeological resources or previously documented or designated Tribal Cultural Resources were identified on the Project Site.

The Project would demolish an existing self storage facility and develop a new 296,733 square-foot self storage facility on the site with ground-floor retail. The existing structures and surrounding structures have not been identified as a potential historic resource by the City or the State.¹⁷ The nearest designated historic resource is the Collins - Furthmann Mansion, which is designated as a City of Los Angeles Historic Cultural Landmark (HCM), located approximately 0.5 miles south of the Project Site.¹⁸ Due to the distance from the nearest historic resource, construction of the Project would not alter the physical building or context if the historic building. Therefore, the Project would not adversely affect the design, character, or feeling associated with any nearby historic resource. As such, impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project could result in a significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

A search of California Historical Resources Information System (CHRIS) records was conducted at the South Central Coastal Information Center housed at California State University, Fullerton in August 2024 to identify any known cultural resources within and in the immediate vicinity of the Project Site¹⁹. This records search included the Project Site and a 0.5-mile search area and a review of the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search identified 23 previous investigations conducted and documented within the vicinity of the Project Site between 1936–2014. One of these studies included the Project Site and two included immediately adjacent areas. A total of 12 cultural resources were previously documented, including 4 prehistoric and 8 historic. No historical or archaeological resources or previously documented or designated Tribal Cultural Resources were identified on the Project Site.

17 City of Los Angeles, Department of City Planning, Office of Historic Resources, SurveyLA, Historic Resources Survey, accessed June 14, 2023. <https://preservation.lacity.org/surveyla-findings-and-reports>.

18 City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic Landmarks – West Adams – Baldwin Hills – Leimert, accessed June 14, 2023. Historic Landmarks Detail | Los Angeles City Planning (lacity.org).

19 Chronicle Heritage, Cultural Resource Desktop Review for the Public Storage Jefferson Replacement Project in the City of Los Angeles, Los Angeles County, California., September 27, 2024. See **Appendix F**.

In addition, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the Project Site in June 2024 by the NAHC. The results were reported as positive and the NAHC recommended contacting the Gabrieleno/Tongva San Gabriel Band of Mission Indians for information. A list of Native American tribes who may also have knowledge of cultural resources in the project area was provided by the NAHC. The City contacted tribal organizations in compliance with the requirements of AB 52. Please see **Section XVIII. Tribal Cultural Resources** for additional information on the tribal consultation process.

In the event that any subsurface archeological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified archaeologist and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Compliance with these existing regulations will ensure any potential impacts would be less than significant and, for this reason, no mitigation measures are required.

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

Less than Significant Impact. A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. As the Project Site has been previously developed, any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction 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 PRC 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 (PRC Section 5097), relating to the disposition of Native American burials would be required. Work would stop immediately, and the County Coroner will be contacted. 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 would 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. If the owner does not accept the descendant's recommendations, the owner or the descendant may request mediation by the NAHC. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required.

VI. ENERGY

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

The conclusions of this section are based on the findings of the Energy calculations that are included as **Appendix B** to this IS.

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

Less than Significant Impact. The following analysis estimates the Project's electricity, natural gas, and transportation fuel usage and evaluates whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy. In accordance with Appendix F of the State CEQA Guidelines, the analysis includes relevant information to address the energy implications of the Project. Energy calculations are provided in **Appendix B** to this IS.

The Project would comply with Title 24, Part 6 of the California Code of Regulations (CCR), also known as Building Energy Efficiency Standards, which regulates the design of building shells and building components. The Title 24 standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2022 Building Energy Efficiency Standards on January 1, 2023.²⁰ Additionally, the CEC is expected to adopt the 2025 Building Energy Efficiency Standards (2025 Building Standards) in 2024, effective January 1, 2026.²¹

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CALGreen, establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CALGreen is periodically amended; the most recent 2022 standards became effective on January 1, 2023 and

20 CEC, 2022 Building Energy Efficiency Standards, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>. Accessed June 2023.

21 CEC, 2025 Building Energy Efficiency Standards, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency>. Accessed June 2023.

would apply to the Project. The Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code was updated in 2020, effective January 1, 2020, and requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code.

Construction

During construction, energy would be directly consumed on a limited basis to power lights, and electronic equipment, and indirectly for the conveyance of water used for dust control during grading. As discussed below, construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment within the Project Site, construction worker travel, haul trips, and delivery trips.

As shown in **Table VI-1: Summary of Energy Use During Construction** and additionally discussed below, a total of approximately 61.4 kilowatt-hours (kWh) of electricity, 105,152 gallons of diesel fuel, and 20,064 gallons of gasoline are estimated to be consumed during construction of the proposed Project.

Fuel Type	Quantity
Electricity	61.4 kWh
Diesel	
Off-Road Construction Equipment ^a	69,640 gallons
On-Road Construction Equipment ^b	35,512 gallons
Total	105,152 gallons
Gasoline	
Off-Road Construction Equipment ^a	0 gallons
On-Road Construction Equipment ^b	20,064 gallons
Total	20,064 gallons

Source: Refer to **Appendix B** for detailed calculations.

^a Off-road construction equipment encompasses construction equipment on the Project site (e.g., excavators, cranes, forklifts, etc.).

^b On-road construction equipment encompasses construction worker trips, haul trips, and delivery trips.

Electricity

During construction, electricity would be consumed 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. Electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from existing substations and electrical lines in and around the Project Site.

As shown in **Table VI-1** above, a total of approximately 61.4 kWh of electricity is anticipated to be consumed during construction. 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 so as to avoid unnecessary energy consumption.

Due to the relatively short duration of the construction process, and the fact that the extent of electricity consumption is inherent to construction projects of this size and nature, electricity consumption impacts would not be considered excessive or substantial with respect to regional supplies. The energy demands during construction would be typical of construction projects of this size and construction of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity resources. Accordingly, electricity demands during construction would be less than significant.

Natural Gas

Construction activities do not typically involve the consumption of natural gas as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction. As a result, the Project would not result in inefficient, or unnecessary consumption of natural gas during construction. Accordingly, natural gas demands during construction would be less than significant.

Transportation Energy

Construction of the proposed Project would consume energy in the form of petroleum-based fuels associated with use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., for deliveries of construction supplies and materials).

The petroleum-based fuel use summary provided in **Table VI-1** represents the amount of transportation energy that could potentially be consumed during construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 125,216 gallons of petroleum (105,152 gallons of diesel and 20,064 gallons of gasoline fuel) throughout the proposed Project's construction period. For purposes of comparison, the Energy Information Administration (EIA) forecasts a national oil supply of 19.84 million barrels (mb) per day in 2028, which is when the Project would be constructed.²² This equates to approximately 7,241 mb per year or 304,147 million gallons (mg) per year. Construction of the proposed Project would account for less than 0.01 percent of the projected annual oil supply in 2028.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The

22 U.S. Energy Information Administration, Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition, <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0>. Accessed June 2023.

energy demand during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure. The proposed Project will also comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel-fueled, commercial vehicles be limited to five minutes at any location. As a result, the proposed Project would not result in inefficient, or unnecessary consumption of transportation resources during construction. Accordingly, transportation resource demands during construction would be less than significant.

Operation

During operation, energy would be consumed for multiple purposes associated with the proposed Project, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during operation of the proposed Project in the form of water usage, solid waste disposal, and vehicle trips, among others. As shown in **Table VI-2: Summary of Annual Energy Use During Operation**, the Project's net energy demand would be approximately 1,732,116 kWh of electricity per year, and a net demand for transportation fuel of 5,825 gallons per year. Additionally, the Project would comply with the All-Electric Building Ordinance in the Los Angeles Municipal Code, which requires that new buildings contain no combustion equipment, plumbing for combustion equipment, gas piping, or any fuel gas serving features.²³

TABLE VI-2: SUMMARY OF ANNUAL ENERGY USE DURING OPERATION

Source	Units	Quantity
Electricity		
Self-Storage	kWh/yr	1,426,549
General Office	kWh/yr	0
Parking	kWh/yr	63,493
Water Conveyance	kWh/yr	911,028
Total Electricity	kWh/yr	2,401,070
<i>Existing Electricity</i>	<i>kWh/yr</i>	<i>668,954</i>
Net Total	kWh/yr	1,732,116
Natural Gas		
Self-Storage	kBTU/yr	0
General Office	kBTU/yr	0
Total Natural gas	kBTU/yr	0
<i>Existing Natural Gas</i>	<i>kBTU/yr</i>	<i>1,229,349</i>
Net Total	kBTU/yr	-1,229,349

²³ City of Los Angeles Municipal Code, Section 99.04.106.8.

TABLE VI-2: SUMMARY OF ANNUAL ENERGY USE DURING OPERATION

Source	Units	Quantity
Transportation Energy		
Diesel	Gallons/yr	6,961
Gasoline	Gallons/yr	38,914
Total Fuel	Gallons/yr	45,876
<i>Existing Fuel</i>	<i>Gallons/yr</i>	<i>39,982</i>
Net Total	Gallons/yr	5,894

Source: Refer to **Appendix B** for detailed calculations.

Notes: kWh/yr. = kilowatt-hours per year; kBtu/yr. = thousand British Thermal Units per year.

Electricity and Natural Gas for the proposed Project is total yearly operational usage. Mobile gasoline and diesel usage were calculated using CalEEMod output data.

Electricity

As shown in **Table VI-2**, buildout of the proposed Project would result in a projected on-site net demand for electricity, totaling 2,401,070 kWh (2.4 GWh) per year. LADWP estimates that electricity consumption within its planning area will be approximately 325,000 GWh annually by 2028, when the proposed Project would be fully built out.²⁴ The Project would account for less than 0.01 percent of the 2028 annual consumption in LADWP’s planning area. As such, the Project would account for a negligible portion of the projected annual consumption in LADWP’s planning area.

Natural Gas

No natural gas will be used by the Project during operation as new Public Storage projects do not use natural gas.

Transportation Energy

As shown in **Table VI-2**, buildout of the Project is projected to generate a demand of 45,876 gallons of transportation fuel. For purposes of comparison, the EIA forecasts a national oil supply of 19.84 mb/d in 2028, which is when the Project will be fully built out. This equates to approximately 7,241 million barrels (mb) per year or 304,147 gallons (mg) per year.²⁵ Operation of the proposed Project would account for less than 0.01 percent of the projected annual oil supply in 2028. As such, the Project would account for a negligible portion of the projected annual oil supply in 2028.

Based on the analysis presented above and the calculations provided in **Appendix B**, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy and thus would not generate significant impacts with regard to energy use and

24 CEC, Demand Analysis Office, California Energy Demand 2018-2030 Revised Forecast, <https://efiling.energy.ca.gov/getdocument.aspx?tn=223244>. Accessed June 2023.

25 One oil barrel is equivalent to 42 gallons.

consumption.

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

Less than Significant Impact. Energy conservation policies and plans relevant to the proposed Project include the California Title 24 energy standards, current CALGreen building code, and the L.A. Green Building Code. As the proposed Project would be required to conform to these regulations, the proposed Project would not conflict with applicable plans for renewable energy or energy efficiency. Moreover, as discussed under response to Question VIII(b), the proposed Project would not conflict with any of the applicable policies and/or regulations outlined in SCAG's 2020–2045 RTP/SCS, the L.A. Green Building Code, and the Sustainable City pLAn/L.A.'s Green New Deal. As such, the Project would not conflict with energy efficiency plans. Project impacts 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The conclusions of this section are based on the findings of the C. Geotechnical Report that is included as **Appendix C** to this IS.

a. **Would the project 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. A significant impact could occur if a project were located within a State-designated Alquist-Priolo Zone or other designated fault zone. Fault rupture is surface displacement that occurs during an earthquake. The California Geological Survey designates faults as active, potentially active, or inactive. The Alquist-Priolo Earthquake Fault Zoning Act establishes standards regulating development adjacent to active faults and areas designated as Earthquake Fault Zones. In addition, the City designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential. Southern California is a seismically active region. However, no active or potentially active faults delineated as Alquist-Priolo Earthquake Fault Zones are known to be present beneath the Project Site.²⁶ The nearest Alquist-Priolo Earthquake Fault Zone for the West Pico Fault, is located approximately 200 feet to the west of the Project Site.²⁷ The Project Site is located within the Newport–Inglewood Fault Zone.²⁸ The Project would include demolition of the existing self storage facility on the Project Site and development of a new mixed-use 296,733 square-foot self storage facility with ground-floor retail space. The Project would be designed in conformance with all current seismic building code requirements. As such, the Project would not exacerbate existing seismic conditions and would not directly or indirectly cause potential substantial adverse effects involving a rupture of a known earthquake fault. Project impacts would be less than significant, and no mitigation is required.

ii. **Strong seismic ground shaking?**

Less than Significant Impact. A significant impact could occur if a project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the site response characteristics. The Project Site is located within the seismically active Southern California region and therefore could be subject to seismic ground motion. The Project would demolish an existing self storage facility and develop a new 296,733 square-foot self storage facility with ground floor retail commercial space on the site. The new facility would be required to conform to all current seismic building code requirements. As such, the Project would not exacerbate existing environmental conditions and would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation is required.

26 California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed June 14, 2023.

27 California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed June 14, 2023.

28 City of Los Angeles, ZIMAS, "Parcel Profile Report," <http://zimas.lacity.org/>.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. The Project Site is located within an area identified as susceptible to liquefaction by the California Department of Conservation under the State Seismic Hazards Mapping Act. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.²⁹ Accordingly, a detailed liquefaction analysis was performed as part of a Geotechnical Report that was prepared on May 22, 2024, included as **Appendix C: Geotechnical Report**. The on-site, fine-grained soils (clay and silt) were evaluated to determine susceptibility to liquefaction during ground shaking. This analysis determined that the potential maximum allowable differential settlement from liquefaction is below the maximum differential settlement allowed by the applicable City standard. The potential for lateral spreading induced by liquefaction was determined to be low and the potential for surface manifestations (sand boils, loss of bearing, etc.) resulting from soil liquefaction at this site is very low. The results of the report concluded that the development of proposed Project is considered feasible with the implementation of design features identified in **Appendix C**, including designing the drainage system to include features such as sloped concrete flatwork, earth swales, and sheet flow gradients in landscape, setback, and easement areas to drain to a suitable discharge area to reduce water infiltration into the subgrade soils and direct water away from buildings and Project Site improvements. Due to soil conditions on the Project Site, in-ground infiltration to meet the City's Low Impact Development (LID) standards is not proposed. Instead, bio retention planters are proposed to meet the City's LID standards.

Additionally, the Project Site is developed, as is the surrounding area. The Project would be designed in accordance with the applicable California Building Code and applicable codes, including the Los Angeles City Building Code which requires that new development projects provide geotechnical reports assessing the potential consequences of liquefaction and soil strength loss and identifying design features to address any potential impact as required by the State Seismic Hazards Mapping Act.³⁰ The Project would be required to conform to all current seismic building code requirements. Impacts would be less than significant, and no mitigation is required.

iv. Landslides?

Less than Significant Impact. The Project Site is located on relatively level terrain and no landslides are mapped in the vicinity of the Project Site.³¹ Furthermore, according to the California Department of Conservation (DOC) Seismic Hazard Zones Map of the Venice Quadrangle the Project Site is not located in a designated earthquake-induced landslide hazard zone.^{32,33} The probability of seismically induced landslides occurring on the Project Site is very low due to the general lack of elevation difference in slope geometry across or adjacent to the site. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death

29 California Geological Survey, Earthquake Zones of Required Investigation, accessed June 14, 2023. <https://maps.conservation.ca.gov/cgs/EQZApp/>.

30 City of Los Angeles, General Plan, Safety Element (2021), https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf. Accessed June 2023.

31 City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed June 14, 2023, <http://zimas.lacity.org/>.

32 CDC, Division of Mines and Geology, Seismic Hazard Zone Report for the Beverly Hills 7.5-Minute Quadrangle, Los Angeles County, California (1998).

33 CDC, Division of Mines and Geology, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California (1998).

involving landslides. As such, Project impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Development of the Project Site has the potential to result in soil erosion during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the site. The Project Site will also be occupied with the proposed building with landscaped areas along Jefferson Boulevard and La Cienega Place. These areas will contain landscape materials and will be maintained, limiting the potential for erosion in these landscape areas.

All grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS) and would be required to comply with the standards designed to limit potential erosion impacts. All on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The grading plan would conform to the City's Landform Grading Manual Guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. For these reasons, Project impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. A significant impact could occur if a project were built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Project Site and the surrounding area is relatively flat and contains Urban land-Biscailuz-Pico complex soils, which are well drained soils located on alluvial fans and floodplains containing varying amounts of organic material. The Geotechnical Report, **Appendix C**, found that the soil was damp to very moist, firm to very dense in relative density silty sand and fine to coarse sand with trace clay and gravel with some interbedded layers of firm to stiff in comparative consistency silt and sandy clay. The Report concluded that that the development of proposed Project is considered feasible. The design would include a spread footing or mat foundation in conjunction with ground improvement methods consisting of aggregate or grouted piers, or similar soil improvement system. Ground improvements would extend from depths of about 1 foot to about 20 feet, in order to create a uniform, stable foundation subgrade for all foundation systems. The ground floor of the new building may be designed as a slab-on-grade and/or load-bearing mat. The slab-on-grade or mat will be underlain by a 4-inch thick granular base supported on a properly prepared subgrade. The design and construction of the Project would be required to comply with the current City of Los Angeles Uniform Building Code (Building Code) which is designed to ensure safe construction and includes building foundation requirements appropriate to site conditions. The Project would be required to comply with applicable Building Code requirements to prevent soil erosion and liquefaction. Therefore, Project impacts would be less than significant, and no mitigation

measures are required.

d. Would the project 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 caused in whole or in part by the project exacerbating the expansive soil conditions?

Less than Significant Impact. Expansive soils contain significant amounts of clay particles that have the ability to give up water (shrink) or take on water (swell). When these soils swell, the change in volume can exert pressures that are placed on them, and structural distress and damage to buildings can occur. Within the Project Site, the United States Department of Agriculture (USDA) Web Soil Survey identified Urban land-Biscailuz-Pico complex soil.³⁴ This soil is not identified as an expansive soil.³⁵

Additionally, the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which include building foundation requirements appropriate to site-specific conditions. Therefore, Project impacts would be less than significant, and no mitigation measures are required.

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

No Impact. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur, and no mitigation is required.

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 unique paleontological resources or geologic features within or near the Project Site. The Project Site is currently developed and located within an urbanized area that has been subject to grading and development in the past and is not known to contain any unique paleontological resource or site or unique geological feature. Ballona Creek is located approximately one-tenth of a mile west of the Project Site. Ballona Creek is a concrete lined channel in the vicinity of the Project Site and does not represent a unique geological feature for this reason. For these reasons, the potential for the Project to result in impacts to unique paleontological or geologic feature 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

34 United States Department of Agriculture, Web Soil Survey, <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed June 2023.

35 United States Department of Agriculture, Urban Soils, <https://www.nrcs.usda.gov/sites/default/files/2022-11/Urban-Soils-Fact-Sheet.pdf>. Accessed June 2023.

Conservation Element and Section 5097.5 of the Public Resources Code.³⁶ Compliance with these existing regulatory requirements will result in any potential impacts being less than significant. No mitigation measures are required.

36 City of Los Angeles, General Plan, Conservation Element, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed June 2023.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Less than Significant Impact. There are no federal, State, or local adopted thresholds of significance for addressing a project’s GHG emissions. CEQA Guidelines Section 15064.4 provides that a lead agency shall 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. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify greenhouse gas emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. CEQA Guidelines 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. The City has not adopted a numeric threshold for the analysis of GHG impacts. As noted above, CEQA Guidelines Section 15064.4(b)(2) allows the City to determine a threshold of significance that applies to the Project, and, accordingly, the threshold of significance applied here is whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Here, any quantification of GHG emissions from the Project is provided for informational purposes only and is not used for a comparative analysis or threshold of significance.

Construction activity impacts are relatively short in duration, and they contribute a small portion of the total lifetime greenhouse gas (GHG) emissions of a project. In addition, GHG emissions-reduction measures for construction equipment are relatively limited.³⁷ The Project site is located within the South Coast Air Basin and is under the responsibility of SCAQMD. In its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds,³⁸ the SCAQMD

37 SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

38 SCAQMD, Greenhouse Gases (GHG), <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2>. Accessed June 2023.

recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures would address construction GHG emissions as part of the operational GHG reduction strategies. The amortized rate is added to the operational emissions, as seen below, in order to calculate the average annual net operational emissions. The forecasting of construction-related GHG emissions requires assumptions regarding the timing of construction as the emission factors for some of the Project’s construction-related GHG emission sources decline over time. As shown in **Table VIII-1: Construction GHG Emissions**, total construction emissions would be 872 MTCO_{2e}. One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of the proposed Project. Moreover, when amortized over an average 30-year Project lifetime, average annual construction emissions from the proposed Project would be 29 MTCO_{2e} per year.

TABLE VIII-1: CONSTRUCTION GHG EMISSIONS

Construction Year	MTCO _{2e} /Year
2027	362
2028	510
Total Construction	872
30-Year Annual Amortized Rate	29

Source: Refer to **Appendix A: Air Quality Study**, Appendix B, Table 2.3.

Notes: GHG = greenhouse gas; MTCO_{2e} = metric tons of carbon dioxide equivalent.

Operation of the Project has the potential to generate GHG emissions through vehicle trips traveling to and from the Project Site. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. Operational emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table VIII-2: Operational GHG Emissions** below. As shown in **Table VIII-2**, average annual net operational emissions from the Project would be 1,529 MTCO_{2e} per year.

TABLE VIII-2: OPERATIONAL GHG EMISSIONS

Source	MTCO _{2e} /Year
Construction (amortized)	29
Area	7
Energy	759
Mobile	399
Waste	89
Water	246
Total	1,529

TABLE VIII-2: OPERATIONAL GHG EMISSIONS

Source	MTCO ₂ e/Year
Existing	450
Net Total	1,035

Source: Refer to **Appendix A: Air Quality Study**, Appendix B, Table 2.5.

Notes: GHG = greenhouse gas; MTCO₂e = metric tons of carbon dioxide equivalent.

In the absence of any adopted, numeric threshold, this analysis evaluates the significance of the Project’s potential GHG emissions consistent with State *CEQA Guidelines* Section 15064.4(b)(2). As the lead agency, the City has determined that a project’s impact with regard to climate change be evaluated solely on the basis of consistency with the climate change plans. As such, a significant impact would occur if the Project conflicts with the applicable policies and/or regulations outlined in SCAG’s 2020–2045 RTP/SCS, the L.A. Green Building Code, and the Sustainable City pLAn/L.A.’s Green New Deal. As shown under response to **Question VIII(b)** below, the Project would not conflict with any of the applicable policies and/or regulations outlined in these plans. As such, impacts related to direct and indirect emissions of greenhouse gas emissions would be less than significant.

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

Less than Significant Impact. There are no federal, State, or local quantitative adopted thresholds of significance for addressing a project’s GHG emissions. In the absence of any adopted, numeric threshold, this analysis evaluates the significance of a project by considering whether the Project conflicts with applicable regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction of mitigation of greenhouse gas emissions. The following analysis describes the extent the Project complies with the regulations and policies outlined in SCAG’s 2020–2045 RTP/SCS, the L.A. Green Building Code, and the Sustainable City pLAn/L.A.’s Green New Deal.

Consistency with SCAG’s 2020-2045 RTP/SCS

The 2020-2045 RTP/SCS identifies strategies and investments to support expanded housing choices for all income levels in areas with a range of transportation choices. Conclusions within the document stated that a comprehensive approach is needed in order to identify housing opportunities within Priority Growth Areas (PGAs) such as job centers, Transit Priority Areas (TPAs) found within half a mile of a major transit station, and High Quality Transit Areas (HQTAs) which include generally walkable transit oriented areas within one half-mile or a 15 minute walk of a well serviced transit stop. These developments would offer alternative modes of transportation which would reduce VMT and GHG emissions associated with vehicles.

The Project Site is located in an urbanized area of the City and is in close proximity to residential uses and public transit services. Moreover, the Project would include bicycle parking which would reduce vehicle trips. These features would offer alternative modes of transportation and would reduce VMT, thereby reducing GHG emissions. As shown in **Table VIII-3: Project Consistency with Applicable SCAG RTP/SCS GHG Emission Reduction Strategies**, the project would be

consistent the with RTP/SCS.

TABLE VIII-3: PROJECT CONSISTENCY WITH APPLICABLE SCAG RTP / SCS GHG EMISSION REDUCTION STRATEGIES

Action	Project Consistency
Focus Growth Near Destinations & Mobility Options	
<p>Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations</p> <p>Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main street</p> <p>Plan for growth near transit investments and support implementation of first/last mile strategies</p> <p>Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses</p> <p>Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods</p> <p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)</p> <p>Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)</p>	<p>Consistent. The Project is an infill redevelopment that would involve construction of a six-story building with approximately 296,733 square feet of self storage use floor area and 6,720 square feet of ground-floor retail use floor area. The Project Site is located within walking distance of existing residential and commercial uses. Additionally, the Project Site is approximately 100 feet north of the Los Angeles County Metropolitan Transportation Authority E (Expo) Line and 0.6 miles south of the Santa Monica Freeway (I-10).</p>
Leverage Technology Innovations	
<p>Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supporting and safe infrastructure such as dedicated lanes, charging and parking/drop-off space</p> <p>Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments</p> <p>Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation</p>	<p>Consistent. The Project includes 66 bicycle parking spaces which would reduce vehicle trips. The Project also includes 10 EV parking spaces and 14 EV capable spaces. These features would promote the use of electric vehicles and offer alternative modes of transportation and would reduce VMTs, thereby reducing GHG emissions.</p>
Support Implementation of Sustainability Policies	
<p>Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions</p>	<p>Consistent. The Project would be designed and operated to meet the applicable requirements of CALGreen and the City’s Green Building Code, which requires water conserving plumbing</p>

**TABLE VIII-3: PROJECT CONSISTENCY WITH APPLICABLE SCAG RTP /
SCS GHG EMISSION REDUCTION STRATEGIES**

Action	Project Consistency
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	fixtures, and would reduce indoor water use. Furthermore, energy use would be reduced by implementing the requirements of current Title 24 standards, including energy-efficient lighting and appliances. Therefore, the Project would support implementation of sustainability policies.
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards	Consistent. The Project is an infill redevelopment that would involve construction of a six-story building with approximately 296,733 square feet of self storage use floor area and 6,720 square feet of ground-floor retail use floor area. Because the Project is an infill development, it would not interfere with regional wildlife connectivity or convert agricultural land. The Project would comply with Sustainable City pLAn, Green New Deal, Title 24, and CALGreen. Therefore, the Project would support development of a green region.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	
Integrate local food production into the regional landscape	
Promote more resource efficient development focused on conservation, recycling and reclamation	
Preserve, enhance and restore regional wildlife connectivity	
Reduce consumption of resource areas, including agricultural land	
Identify ways to improve access to public park space	

Consistency with City pLAn/L.A.’s Green New Deal

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Green New Deal provides information as to what the City will do with buildings and infrastructure in its control and provides specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita by five percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The Project would comply with the L.A. Green Building Code as shown in **Table VIII-4: Project Consistency With Applicable Sustainable City pLAn/Green New Deal Measures**. The L.A. Green Building Code requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), follow the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. The proposed Project would also meet the 2022 mandatory measures of the CALGreen Code and the 2020 L.A. Green Building Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy

efficiency caused by heat loss and heat gain. CalGreen incorporates and overlap with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. Therefore, the proposed Project would not conflict with the Sustainable City pLAn/L.A.'s Green New Deal.

TABLE VIII-4: PROJECT CONSISTENCY WITH APPLICABLE SUSTAINABLE CITY PLAN / GREEN NEW DEAL MEASURES

Action	Project Consistency
Renewable Energy	
<p>LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.</p> <p>Increase cumulative megawatts by 2025; 2035; and 2050 of</p> <p>Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW</p> <p>Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW</p> <p>Demand response (DR) programs to 234 MW (2025) and 600 MW (2035)</p>	<p>Consistent. While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy resources to 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with the requirements of SB 100 and City goals.</p>
Local Water	
<p>Source 70% of L.A.'s water locally and capture 150,000 acre-feet per year of stormwater by 2035.</p> <p>Recycle 100% of all wastewater for beneficial reuse by 2035.</p> <p>Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050.</p> <p>Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain reduce 2035 per capita water use through 2050.</p> <p>Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.</p>	<p>Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.</p>
Clean and Healthy Buildings	
<p>All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.</p> <p>Reduce building energy use per square foot for all building types 22% by 2025; 34% by 2035; and 44% by 2050.</p>	<p>Consistent. The Project would be constructed in accordance with the applicable requirements of CALGreen and the City's Green Building Code.</p>
Mobility & Public Transit	
<p>Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050.</p>	<p>Consistent. The Project is an infill development that would involve construction of a six-story building with approximately 296,733 square feet of self storage use floor area and 6,720 square</p>

TABLE VIII-4: PROJECT CONSISTENCY WITH APPLICABLE SUSTAINABLE CITY PLAN / GREEN NEW DEAL MEASURES

Action	Project Consistency
<p>Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.</p> <p>Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games.</p>	<p>feet of ground-floor retail use floor area. The Project site is located within walking distance of existing residential and commercial uses. Additionally, the Project Site is approximately 100 feet north of the Los Angeles County Metropolitan Transportation Authority E (Expo) Line and 0.6 miles south of the Santa Monica Freeway (I-10).</p>
Zero Emissions Vehicles	
<p>Increase the percentage of electric and zero emission vehicles in the city by 25% by 2025; 80% by 2035; and 100% by 2050.</p> <p>Electrify 100% of LA Metro and LADOT buses by 2030.</p> <p>Reduce port-related GHG emissions by 80% by 2050.</p>	<p>Consistent. In accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6, the Project would designate 10 EV parking spaces (EV ready) and 14 EV capable spaces for EV parking.</p>
Waste and Resource Recovery	
<p>Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050</p> <p>Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028</p> <p>Eliminate organic waste going to landfill by 2028 increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.</p>	<p>Consistent. The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and State programs would achieve consistency with this measure.</p>
Urban Ecosystems and Resilience	
<p>Increase tree canopy in areas of greatest need by at least 50% by 2028.</p> <p>Complete or initiate restoration identified in the 'ARBOR' Plan by 2035.</p> <p>Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028.</p> <p>Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.</p> <p>Ensure proportion of Angelenos living within ½ mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050.</p> <p>Achieve and maintain 'no-net-loss' of native biodiversity by 2035.</p>	<p>Consistent. The Project would be an infill development in an urbanized area and thus would not adversely impact native biodiversity. The Project would also include the planting of 28 trees.</p>

Consistency with Los Angeles Green Building Code

As discussed above, the Project would comply with the Los Angeles Green Building Code. Through this compliance, the Project's GHG emissions would be reduced by increasing efficiency, reducing indoor and outdoor water demand, installing energy-efficient equipment, and complying with 2022 California Title 24 Building Energy Efficiency Standards. This includes the electric-readiness requirement for gas appliances. The Project would also meet the 2022 mandatory measures of the CALGreen Code and the 2020 L.A. Green Building Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. CalGreen incorporates and overlap with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. By designing the building using CMU and insulated metal panels, the Project not only addresses the longevity of the structures but also energy consumption. The proposed six-story building would be climate-controlled and will meet or exceed all City of LA Green Building code requirements to reduce energy demands. The perimeter trees and groundcover, along with the covered parking, will help reduce the site's heat island effect. All interior lights, except for emergency lights, are operated via motion detector; thus, most lights are off most of the time, further saving energy. Full height glazing at the ground floor will be recessed under the level two deck above which prevents sunlight from directly hitting the glass and causing solar heat gain. Articulation of façade bump-outs will cast shadows that limit light levels penetrating visual glazing at levels below. The majority of parking is located under the building in a shaded environment. Therefore, the Project would not conflict with the City's Green Building Code.

The Project would be consistent with State-applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, impacts would not be considered significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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 project could have a significant impact to hazards and hazardous materials if the project were to involve (a) a risk of accidental explosion or release of

hazardous substances (including but not limited to oil, pesticides, chemicals or radiation); or (b) the creation of any health hazard or potential health hazard. The types and amounts of hazardous materials that would be used in connection with operation of the Project would be typical of those used in maintenance of commercial self storage properties with retail uses, such as cleaning solutions, solvents, or painting supplies. These substances are not stored or utilized in high concentrations and would be handled in accordance with their proper use and all applicable federal, State, and local regulations. As part of the operation of the Project, lessees of the self storage units enter into an agreement with Public Storage that specifies hazardous materials are not permitted to be stored on the premises and that the premises shall not be used in any manner that will constitute a hazard, waste, nuisance or unreasonable annoyance to others. As such, the potential for a hazardous impact to occur during operation of the Project is low. Project impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. A project could have a significant impact to hazards and hazardous materials if a project involved (a) a risk of accidental explosion or release of hazardous substances (including but not limited to oil, pesticides, chemicals or radiation); or (b) the creation of any health hazard or potential health hazard. The Project, which includes self storage and retail uses and which replaces the existing self storage use, does not involve the use or storage of hazardous materials. As such, it would not create a new hazard to the public, impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. The determination of significance is made on a case-by-case basis, considering (1) the regulatory framework for the health hazard; (2) the probable frequency and severity of consequences to people from exposure to the health hazard; and (3) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard. There is one existing school within one-quarter mile of the Project Site, the Echo Horizon School at 3430 McManus Ave, Culver City, CA 90232, approximately 0.18 miles west of the Project Site. 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. As such, impacts would be less than significant, and no mitigation is required.

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

No Impact. The determination of significance is made on a case-by-case basis, considering (1) the regulatory framework for the health hazard; (2) the probable frequency and severity of consequences to people from exposure to the health hazard; and (3) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground

storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste. There are no hazardous materials sites listed for the Project Site.^{39,40,41} As such, the Project is not anticipated to exacerbate current or former environmental conditions.

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 have the potential to exacerbate current environmental conditions so as to result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant impact may occur if a project were located within a public airport land use plan area, or within 2 miles of a public airport, and subject to a safety hazard. The Project Site is not located within 2 miles of a public airport. The closest public airport to the Project Site is Santa Monica Airport, approximately 4.15 miles to the west of the Project Site. The Project would not be exposed to air traffic generated noise in excess of existing conditions. Project impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. A project could have a significant impact if a project would involve possible interference with an emergency response plan or emergency evacuation plan. The Project Site is not located along a selected disaster route as identified by the City's General Plan.⁴² The nearest disaster route is La Cienega Boulevard, approximately 0.16 miles east of the Project Site. It is expected that the majority of construction activities for the Project would be confined to the Project Site. Limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures to Jefferson Boulevard in front of the Project Site. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Furthermore, temporary lane closures of Jefferson Boulevard in front of the Project Site would not impede access to La Cienega Boulevard. Impacts would be less than significant, and no mitigation is required.

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

No Impact. The Project Site is located within a highly urbanized area of the City and does not include wildlands or high-fire-hazard terrain or vegetation. In addition, the Project Site is not

39 California Department of Toxic Substances Control, EnviroStor, accessed June 14, 2023. <https://www.envirostor.dtsc.ca.gov/public/>.

40 California Department of Toxic Substances Control, EnviroStor, Hazardous Waste and Substances Site List (CORTESE), accessed June 14, 2023. <https://www.envirostor.dtsc.ca.gov/public/>.

41 California State Water Resources Control Board, GeoTracker, accessed June 14, 2023. <https://geotracker.waterboards.ca.gov>.

42 City of Los Angeles, Local Hazard Mitigation Plan, (2018), accessed June 14, 2023. https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf.

identified by the City as being located within an area susceptible to fire hazards.⁴³ Additionally, the proposed retail and self storage uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. No impacts related to this issue would occur, and no mitigation is required.

43 City of Los Angeles, General Plan, "Safety Element" (2021), General Plan Land Use in Very High Fire Hazard Severity Zones, accessed June 14, 2023. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf.

X. HYDROLOGY AND WATER QUALITY

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

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

Less than Significant Impact. A project could have a significant impact on surface water quality if discharges associated with the project were to create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the

purpose of this specific issue, a significant impact may occur if the Project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems.

The Project will comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP)⁴⁴ requirements to reduce potential water quality impacts and the City's Low Impact Development (LID) Ordinance.⁴⁵ The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. The LID Ordinance requires that the Project retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows. Due to soil conditions on the site, in-ground infiltration to meet the City's Low Impact Development (LID) standards is not proposed. Instead, bio retention planters are proposed to meet the City's LID standards. In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project will comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant is required to submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan is required to be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

The Project would demolish an existing self storage facility and develop a new 296,733 square foot self storage facility with ground-floor retail on the site in a location characterized by other commercial structures and paved areas. The Project does not involve the introduction of new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the Project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing condition of the Project Site and its surroundings. As such, potential water quality impacts from the Project would be less than significant, and no mitigation measures are required.⁴⁶

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 project could have a significant impact on groundwater level if the project were to change potable water levels sufficiently to (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage

44 California State Water Resources Control Board (SWRCB), Standard Urban Storm Water Mitigation Plan (SUSMP), accessed June 2023. https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/susmp/susmp_details.shtml.

45 City of Los Angeles, Low Impact Development (LID) Ordinance, June 2023. https://lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017151.pdf.

46 Lau, Rowena, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment. City of Los Angeles Inter-Departmental Correspondence to Vincent P. Bertoni, Director, Department of City Planning. June 27, 2023.

of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. The Project is not adjacent to a well field nor part of a groundwater recharge area.⁴⁷ As such, The Project Site is not a source of substantial groundwater recharge. Project impacts on groundwater would be less than significant, and no mitigation is required.

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

i. result in substantial erosion or siltation on- or off-site?

Less than Significant Impact. A project could have a significant impact on surface water hydrology if the project were to result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is located in an urbanized area of Los Angeles and is approximately 0.06 miles east of Ballona Creek. The Project Site is fully developed with impervious surfaces. Implementation of the Project would not increase site runoff or result in changes to the local drainage patterns. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Adherence to local LID requirements would reduce the amount of surface water runoff after storm events because the Project would be required to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period.⁴⁸ In addition, the Project would connect to existing drainage infrastructure and therefore would not alter existing drainage patterns or the course of a stream or river. Impacts would be less than significant, and no mitigation is required.

ii. substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Less than Significant Impact. A project could have a significant impact on surface water hydrology if the project were to result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site does not contain any stream or river. However, the Project Site is approximately 0.06 miles east of Ballona Creek. The Project would connect to existing drainage infrastructure and therefore would not alter existing drainage patterns. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. A project could have a significant impact on surface water quality if discharges associated with the project were to create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined

⁴⁷ California State Water Resources Control Board, GeoTracker, accessed June 2023. <https://geotracker.waterboards.ca.gov>.

⁴⁸ City of Los Angeles, Low Impact Development (LID) Ordinance, accessed June 2023. https://lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017151.pdf.

in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. Runoff from the Project Site would be collected on the site and directed towards existing storm drains in the Project vicinity. Pursuant to local practice and City regulations, stormwater retention would be required as part of SUSMP implementation features and the requirements of the LID Ordinance requirements. The primary purpose of the LID Ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. Accordingly, compliance with the LID Ordinance will result in a reduction of the amount of surface water runoff leaving the Project Site as compared to the current conditions. The Project would not create or contribute to surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is located in an urbanized area that is currently served by storm drain infrastructure under Jefferson Boulevard that drains to Ballona Creek. The development of the Project would not change this local drainage pattern; therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur, and no mitigation measures are necessary.

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

No Impact. A significant impact would occur if the Project Site were sufficiently close to the ocean or other water body to potentially be at risk of seismically induced tidal phenomena (e.g., seiche and tsunami), or was within a flood zone, and if the Project Site utilized, stored or otherwise contained pollutants that would be at risk of release if inundated. The Project Site is not located within a Tsunami Inundation Zone or Flood Zone.⁴⁹ Furthermore, the proposed uses do not involve the storage or use of substantial quantities of potential pollutants. No impacts would occur, and no mitigation measures are necessary.

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

No Impact. A significant impact could occur if the Project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan. The Project would demolish an existing self storage facility and develop a new 296,733 square foot self storage facility with ground-floor retail on the site. As compared to existing conditions, the Project would not introduce potential sources of water pollutants. Moreover, the Project would comply with the City's LID Ordinance, the primary purpose of which is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows. No impacts would occur, and no mitigation measures are necessary.

49 City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed June 14, 2023. <http://zimas.lacity.org/>.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

No Impact. A significant impact could occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The Project would demolish an existing self storage facility and develop a new 296,733 square-foot self storage facility on the site utilized for the storage of household goods. The Project would not create a barrier within an established community. No alteration of the street pattern is proposed and no separation of uses or disruption of access between land use types would occur as a result of the Project. Therefore, the Project would not significantly disrupt or divide the physical arrangement of the established community. As such, there would be no impacts, and no mitigation is required.

b. Cause a significant environmental impact due to 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 significant impact could occur if a project were inconsistent with the General Plan or zoning designations currently applicable to the Project Site, or would cause adverse environmental effects which the General Plan and Zoning Ordinance are designed to avoid or mitigate. The Project entitlement requests are anticipated to include (1) a Height District Change to Height District 2; (2) a CPIO Amendment to permit a floor area ratio of 3.49:1, to increase the allowable height to approximately 86 feet, to permit the existing storage use within one-half mile of another mini-storage facility, and to allow driveways closer than 200 feet; (3) a Use Variance, pursuant to LAMC Section 12.27 to allow a mixed-use self storage facility with ground-floor retail in the MR1 zone; (4) a Site Plan Review; and (5) approval of a CPIO Clearance to permit the development of a new six-story mixed-use retail and self storage building consisting of approximately 303,453 square feet in the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay Zone. Based on these requests the analysis of impacts below focuses on a limited range of plans, policies, and regulations that are intended to avoid or mitigate environmental effects.

General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth a City-wide comprehensive long-range growth strategy and defines City-wide policies that are implemented at the community level through community plans and specific plans.⁵⁰ The Project is consistent with the Framework Element’s goals, objectives, and policies, including those listed in **Table XI-1: Project Consistency with Applicable Policies of the Framework Element**, below.

TABLE XI-1: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE FRAMEWORK ELEMENT	
Goal, Policy, Objective	Project Consistency
Chapter 3 – Land Use	
<p>Goal 3J. Industrial growth that provides job opportunities for the City’s residents and maintains the City’s fiscal viability.</p> <hr/> <p>Objective 3.14. Provide land and supporting services for the retention of existing and attraction of new industries.</p> <hr/> <p>Policy 3.14.2. Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable “theme” sectors (e.g., movie/television/media production, set design, reproductions, etc.).</p>	<p>Consistent. The Project would provide for the continuation of the existing storage use, provide new ground-floor retail uses and support the growth in residents and businesses to the area as a part of the Limited Industrial land use designation. The new uses will continue to provide growth and job opportunities within the community. The Project would involve modernization, retention and replacement of the existing self storage uses and would help to ensure the continued attraction of new residents and businesses to this area with a modern building design while increasing the space available for ground-level landscaping and pedestrian uses. The flexible zoning of the Limited Industrial land use designation permits a wide range of industrial, storage, and limited commercial and manufacturing uses to allow for industries and their supporting uses to exist within the same sector.</p>

The Project would contribute towards Goal 3J provided by the City’s Framework Element and would not conflict with the General Plan Framework Element.

West Adams-Baldwin Hills-Leimert Community Plan

The Project Site is located within the West Adams-Baldwin Hills-Leimert Community Plan Area. Adopted by the City Council on June 29, 2016, the West Adams-Baldwin Hills-Leimert Community Plan designates the Project Site as Limited Industrial.⁵¹ The Project would involve the replacement of an existing 82,051 square feet self storage facility with the construction of a new mixed-use 296,733 square feet of self storage and 6,720 square feet of retail facility. No changes to the Project Site General Plan land use designation are proposed. The Project is consistent with

50 City of Los Angeles, Department of City Planning, General Plan, Framework Element, accessed June 2023. https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf.

51 City of Los Angeles, Department of City Planning, Community Plans, West Adams-Baldwin Hills-Leimert Community Plan, accessed June 14, 2023. https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf.

the Community Plan goals and policies, as discussed in **Table XI-2: Project Consistency with Applicable Policies of the West Adams-Baldwin Hills-Leimert Community Plan**, below:

TABLE XI-2: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN

Goal, Policy	Project Consistency
<p>Goal LU65. A community where existing and future job opportunities for residents are provided and which minimize environmental and visual impacts to the community.</p>	<p>Consistent. The Community Plan identifies that the Project is located in the Jefferson/La Cienega Boulevards Expo Line Transit-Oriented Development (TOD) Community Plan Implementation Overlay (CPIO) District Subarea which provides supplemental development and use regulations tailored to the Community Plan Area, addressing the scale, size, and character of development based on a community's specific needs. The Project would provide job opportunities and services for nearby residents, by providing ground-floor retail space along Jefferson Boulevard. The Project has been designed to minimize both environmental and visual impacts to the community by incorporating extensive landscaping and including ground-floor retail commercial space designed to enhance the pedestrian environment along Jefferson Boulevard.</p> <p>The building is designed with a unique massing concept that breaks up the typical storage building into bottom, middle and top sections to break down the visual mass of the building. The base of the building along Jefferson Boulevard includes pedestrian focused retail commercial space, which reduces the overall scale of the building and welcomes the public through an architectural portal. The middle and top sections of the building, consisting of the storage levels, is rich in texture and color, displaying carefully staged glazing areas and with a series of colored metal panels that play with light and shadow while also defining a hierarchy of key architectural features. This base, middle and top design wraps around all sides of the building to provide careful articulation of the building, providing a fresh take on a typical storage building to complement the existing urban context of the site.</p> <p>Characteristics of the Project designed to enhance and improve the existing community experience include: (1) an eight-foot dedication that more than doubles the existing sidewalk along Jefferson Boulevard from seven feet to 15 feet in width; (2) voluntarily setting the building back from the right of way up to nineteen feet with pedestrian amenities to create a welcoming</p>

TABLE XI-2: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN

Goal, Policy	Project Consistency
	<p>public realm; (3) landscaping in the setback area with 18 new trees lining the sidewalk frontages on both Jefferson Boulevard and La Cienega Place to soften the urban edge; and (4) an approximately 3,500 square-foot pedestrian plaza. These pedestrian amenities minimize the visual mass of the building and facilitate direct, safe, attractive, accessible, and enjoyable walking by the public to foster a more welcoming pedestrian experience than what exists today.</p> <p>Many changes of plane, both horizontal and vertical, along with changes in materials and color break up all sides of the building, create a pleasing architectural composition. The exterior materials include metal panels with different widths, different profiles, and textures that play with natural and artificial light as it hits the façades of the building. The selected metal panels are highly resistant to weather, corrosion, and impact which maintain the appearance of the building as a permanent member of the community. High performance glazing is integrated on each level of the building to ensure energy-efficiency for low environmental impact while maintaining patron comfort.</p> <p>Metal panels of different widths and colors are combined with a painted CMU (concrete masonry units) base to create a bottom, middle and top of the building. Both vision glass and spandrel glass are included to break up the façades and provide visual interest. The upper levels, designed with a sophisticated interplay of geometric patterns, soften the overall mass of the building, ensuring a balanced composition that respects and complements the scale of the surrounding environment. Above, a series of display windows on Jefferson Boulevard and La Cienega Place reveal glimpses of the building's internal functions, adding depth and visual interest to the architectural expression.</p> <p>The south façade facing Jefferson Boulevard includes retail space with transparent glass storefront on the ground floor. The retail spaces at the street level are set back from the main façade, adding depth and interest to the street frontage. Another section of the south façade includes spandrel glass, surrounded by a horizontal band, as a contrast to the smooth and</p>

TABLE XI-2: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN

Goal, Policy	Project Consistency
	<p>corrugated metal panels, as well as the CMU painted base.</p> <p>The highlighted pop-out on the southeast corner of the building extends approximately 18” from the main face of the building. The upper floors in the pop-out section also include a large expanse of showcase windows that add depth to the design, allowing for a view inside of the doors that are set 5 feet back from the glass, which extends slightly from the main façade plane</p> <p>The upper floors of all sides of the building include sections of different materials and colors including painted corrugated metal panels of differing rib widths and colors. Different rib widths provide texture and shadow changes on the façade. The sections of different materials break up the façade both horizontally and vertically, adding to the architectural interest and eliminating any large sections of blank façade.</p>
<p>Policy LU65-1. Maintain Existing Industrial Land Where Appropriate. Maintain existing industrial land uses where appropriate as well as designate lands for new emerging industry including industrial parks, research and development facilities, light manufacturing, and other similar uses which provide employment opportunities.</p>	<p>Consistent. The Project maintains industrial land and is proposing replacement and expansion of a light industrial use with a mix of active retail that allows for an increase in industrial and commercial employment for community residents, while keeping industrial uses in their appropriate areas.</p>
<p>Policy LU65-3. Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.</p>	<p>Consistent. The Project consists of high-level architecture and building materials. It proposes a distinctive yet familiar character. Furthermore, storage and retail are compatible uses with nearby existing light industrial, residential, and commercial spaces in the surrounding Project area. The Project building is designed as a unique Public Storage project for this specific location, characterized by a modern architectural style and would feature signage, lighting, and landscaping that fit in with the surrounding community. Building materials include metal paneling in horizontal and vertical bands of different widths in orange, gray and tan; concrete masonry block; and clear and spandrel glazing.</p>
<p>Policy LU65-4. Achieve adequate compatibility through design treatments, compliance with environmental protection standards, and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.</p>	<p>Consistent. The Project would create a vibrant mix of uses that is engaging and accessible to pedestrians and community members with safer, modern storage space and ground-floor, active retail uses. These uses will allow for compatibility between the Project uses and nearby residential uses. All storage uses will be enclosed inside the</p>

TABLE XI-2: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN

Goal, Policy	Project Consistency
	<p>building with controlled access to the storage units. The Project replaces, redevelops and modernizes an existing, much-needed use. The Project's building façades are articulated with horizontal banding and glazing to break up the massing and maintain a human scale at the street by using a variety of materials and textures on the ground floor. These include different widths and colors of metal panels. The Project actively engages the street corner with an architectural tower, landscaped courtyard, and storefront glazing allowing visibility into the building.</p>
<p>Goal LU66. A community plan which retains industrial designations that are appropriate in order to maintain and increase industrial employment for community residents</p>	<p>Consistent. The Project includes maintaining the General Plan land use designation of Limited Industrial for the Project Site. Ensuring that industrial land in the Jefferson/La Cienega TOD Subarea is preserved and maximized is an important factor in retaining a strong industrial and commercial employment sector in the Community Plan area. The Project maintains industrial land and is proposing replacement and expansion of an industrial use with a mix of active retail that allows for an increase in industrial and commercial employment for community residents, while keep industrial uses in their appropriate areas.</p>
<p>Policy LU66-3. Encourage the aggregation of smaller, older sites to facilitate revitalization along the Expo Line.</p>	<p>Consistent. The Project includes ground-level, pedestrian-friendly commercial and retail space, designed to reinvigorate the streetscape in the area. Furthermore, the additional safer and modern storage space will support housing and local businesses near the E (Expo) Line.</p>
<p>Policy LU67-1. Enhanced Streetscapes and Urban Design. Improve the quality of life and the built environment by promoting safety through enhanced streetscape and urban design that promotes pedestrian activity and bicycling instead of automobile dependence through better pedestrian orientation of structures and conservation of desirable prevailing neighborhood character.</p>	<p>Consistent. The Project includes planting trees along the south and west edges of the Project Site along the sidewalk edge, providing shade and scale to the sidewalk. The sidewalk along Jefferson Boulevard will be widened to 15 feet for ease and safety of pedestrian circulation and pedestrian activation. The landscape buffer provided as part of the Project between the building and the sidewalk along both Jefferson Boulevard and La Cienega Place will enhance the pedestrian experience and streetscape. The primary pedestrian entrance to the Project from the street is at the corner of Jefferson Boulevard and La Cienega Place, a safe distance from the main vehicular entrance. The Project design includes a welcoming and accessible pedestrian</p>

TABLE XI-2: PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN

Goal, Policy	Project Consistency
	entrance that is signaled by a break in the Project’s landscaping and trees. A publicly accessible plaza, located adjacent to the public way at the building frontage is proposed to invite the public into the Project Site. The plaza will serve retail uses on the ground floor. Furthermore, most parking spaces are under the building, hidden from pedestrian view, making for a more pleasant pedestrian experience.

West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District

The Project Site is also located in the West Adams-Baldwin Hills-Leimert CPIO District. Within the CPIO, the Project Site is located in the Jefferson/La Cienega – Expo Line Transit Oriented (TOD) Subarea. The Project is consistent with the purposes of the CPIO, such as those provided in **Table XI-3: Project Consistency with the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District**, below:

TABLE XI-3: PROJECT CONSISTENCY WITH THE WEST ADAMS-BALDWIN HILLS-LEIMERT COMMUNITY PLAN IMPLEMENTATION OVERLAY DISTRICT

Purposes and Development Standards	Project Consistency
<p>D. To promote and facilitate revitalization of properties that can capitalize upon close proximity to the Expo Line.</p>	<p>Consistent. The Project includes the demolition of an existing self storage facility in order to construct the new mixed-use six-story building with self storage and street-facing retail uses. The Project would maintain and replace existing uses while expanding uses to include retail. The additional uses would revitalize the area by supporting the growth in residents and businesses in the area and providing new job opportunities within the community.</p>
<p>E. To encourage a vibrant mix of uses that increases access to a greater variety of goods and services within close proximity to surrounding established residential neighborhoods, commercial corridors, and industrial employment areas.</p>	<p>Consistent. The Project Site’s zoning and Limited Industrial land use designation permit a wide range of industrial, storage, and limited commercial and manufacturing uses to allow for industries and their supporting uses to exist within the same sector. The addition of retail uses to the Project Site would allow for greater access to a variety of goods and services for the surrounding community.</p>

The development standards of the West Adams-Baldwin Hills-Leimert CPIO District would apply to the proposed Project. The Project is seeking a CPIO Amendment pursuant to LAMC Section 12.32 to permit a FAR of 3.49:1, to increase the allowable height to approximately 86 feet; to permit the existing storage use within one-half mile of another storage facility; and to allow

driveways closer than 200 feet. The proposed Project would be generally consistent with all other applicable West Adams-Baldwin Hills-Leimert CPIO District development standards and is consistent with the purposes of the CPIO. For these reasons, the Project would be generally consistent with the West Adams-Baldwin Hills-Leimert CPIO District.

Los Angeles Municipal Code

Development of the Project is subject to the constraints of the Los Angeles Municipal Code (LAMC), notably Chapter I, *General Provisions and Zoning*.⁵² The proposed Project is seeking a Height District Change to permit a change from Height District 1VL to Height District 2 to permit development of the Project Site to the proposed FAR of 3.49:1, pursuant to LAMC Section 12.32. Additionally, the proposed Project is seeking a Use Variance to allow a mixed-use self storage facility with ground-floor retail in the MR1 zone, pursuant to LAMC Section 12.27. The requested uses are typically permitted in other commercial and industrial zones, and the self storage use is the 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 community. 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.

Based on the above, impacts would be less than significant, and no mitigation is required.

52 City of Los Angeles, Municipal Code, accessed June 14, 2023. <https://www.lacity.org/government/popular-information/city-charter-rules-and-codes>.

XII. MINERAL RESOURCES

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

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

No Impact. The Project Site is not located within an MRZ-2 Area,⁵³ Oil Drilling District, or State-designated oil field.⁵⁴ The Project Site is not delineated on any local land use plan as a mineral resource recovery site. As such, no impacts would occur, and no mitigation is required.

b. 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 could occur if a project site were located in an area used or available for extraction of a regionally-important mineral resource, or if a project would convert an existing or future regionally-important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a designated MRZ-2 Area, Oil Drilling District, or State-designated oil field.⁵⁵ Therefore, no impacts would occur associated with the loss of availability of a known mineral resource, and no mitigation is required.

53 California Department of Conservation, CGS Information Warehouse: Mineral Land Classification, accessed June 14, 2023. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

54 California Department of Conservation, DOC Maps: Oil & Gas, Oil & Gas Well Finder, accessed December 1, 2021. <https://maps.conservation.ca.gov/oilgas/>.

55 City of Los Angeles DCP, General Plan, "Conservation Element" (2001), Exhibit A: Mineral Resources, accessed June 14, 2023. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

XIII. NOISE

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

The conclusions of this section are based on the findings of the Noise Study that is included as **Appendix D** to this IS.

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

Less than Significant with Mitigation Incorporated. A significant impact would occur if noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, would result from a project.

On-Site Construction Noise

Construction of the proposed Project would require the use of equipment with the potential to generate noise above ambient noise levels. Noise levels would vary based on the amount and type of equipment being used, and the location of each activity. Construction activities that would occur during the construction phases (demolition, grading, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project Site.

Noise from Project construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Each construction phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously. The estimated construction noise levels were calculated for each of the analyzed receptors (refer to **Appendix D**) during each of the construction phases. Given the physical size of the Project site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors the results present a conservative impact analysis. This is considered a worst-case evaluation because construction of the Project would typically use fewer pieces of equipment simultaneously at any given time as well as operating throughout the construction site (i.e., most of the time construction equipment would be operating at distances further away from the off-site receptors than assumed in the forecasting of Project construction noise levels). As such, Project construction would often generate lower noise levels than reported herein.

Certain land uses are particularly sensitive to noise, including residences, schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. The vicinity of the proposed Project is predominantly composed of commercial, industrial, and residential uses. As mentioned previously, to the north of the Project Site are commercial office, industrial and retail uses; to the east are multi-family residential development; to the south is the Metro Expo Line as well as commercial office, industrial, and multi-family uses; and to the west are commercial office, industrial and retail uses. More specifically, the nearest sensitive uses include multi-family residential uses located immediately to the east along Jefferson Boulevard.

In August 2024, Department of City Planning released updates to the construction noise and vibration thresholds. Generally, there are commonly two types of noise standards, as follows:

- Relative or “increase” standards – these are quantified thresholds, expressed as an allowable increase in decibels, attributed to the construction noise contribution, over the pre-existing outdoor ambient sound level at a receptor.
- Absolute Threshold: Maximum 80 dBA Leq (8-hour) absolute threshold at daytime noise sensitive uses (at the property line with outdoor uses or at the exterior of the building).⁵⁶

Increase Over Ambient

- For construction activities that occur between 7:00 AM and 7:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays, no daytime numerical threshold above ambient noise levels are identified. The City does not consider increases in daytime ambient noise levels resulting from construction activities as constituting significant environmental effects. Instead, the City utilizes an absolute noise exposure level over an extended period for

⁵⁶ Daytime Noise Sensitive Uses include single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; places of assembly including churches or houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; outdoor public recreational areas; and parks. This does not include private residential balconies which may or may not extend past the exterior of a building, or to private outdoor spaces.

evaluating potential noise impacts during daytime hours, as this metric better reflects potential health impacts due to construction noise.

- For construction activities that occur between 7:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturdays, and anytime on Sundays or national holidays, noise levels at sensitive uses would not exceed 5 dBA above the ambient noise level at the receptor.

Absolute Threshold

- On- and off-site construction noise during daytime hours (7:00 AM and 7:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturdays) would be limited to a maximum 80 dBA Leq (8-hour) absolute threshold at sensitive uses (at the property line with outdoor uses or at the exterior of the building), including outdoor public recreational areas.
 - This threshold applies to residential uses (at the property line with outdoor uses or at the exterior of the building); including expansive upper-level deck/open spaces areas that provide for the recreational use of residents. Examples include large patios or decks that are the primary outdoor use area in an apartment complex. However, this standard does not apply to private residential balconies which may or may not extend past the exterior of a building.
- For construction activities that occur between 7:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturdays, and anytime on Sundays or national holidays, the maximum exterior noise level at sensitive uses where sleep is expected may not exceed the following:
 - 55 dBA Leq for sensitive uses within older buildings that would have operable windows that may be open.
 - 65 dBA Leq for sensitive uses with windows closed that are not operable are single-glazed.
 - 70 dBA Leq for sensitive uses that have newer construction (i.e., the structures have been designed to ensure that an interior 45 dBA is obtained with double-paned windows).

Table XIII-1: Construction Maximum Noise Estimates presents the maximum noise impacts that are forecasted to occur at each of the receptor sites. As shown, average noise levels during construction would result in a maximum increase of 9.9 dBA above the significance threshold at the multi-family residential uses to the east (Site 1) without implementation of technically feasible noise reduction measures as mentioned in Section 112.05 of the City's Municipal Code.

TABLE XIII-1 : CONSTRUCTION MAXIMUM NOISE ESTIMATES

Noise Monitoring Site	Calculated Noise Level (Leq-1 hour) by Construction Phase					Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold without Noise Reduction Measures
	Demolition	Grading	Building Construction	Paving	Architectural Coating		
Site 1	89.3	86.5	89.9	85.4	75.6	80.0	+9.9
Site 2	71.8	69.0	72.4	67.9	58.1	80.0	0.0
Site 3	62.6	59.8	63.2	58.8	49.0	80.0	0.0
Site 4	61.6	58.8	62.2	57.7	47.9	80.0	0.0
Site 5	54.4	51.6	55.0	50.6	40.8	80.0	0.0

Refer to **Appendix D** for Noise Study prepared by Meridian Consultants dated December 2025.

As mentioned previously, in devising construction noise control strategies, important options include controlling the noise at the source. Source control requirements provide added benefits in promoting technological advances in the development of quieter equipment. Source control techniques can include: (1) muffler requirements, (2) maintenance and operational requirements, and (3) equipment emission level requirements. These control techniques can be used separately or in combination in order to achieve the desired results. Most control noise originates from equipment powered by either gasoline or diesel engines. A large part of the noise emitted is due to the intake and exhaust portions of the engine cycle. A remedy for controlling much of the engine noise is by adhering to the **Mitigation Measures NOI-1 and NOI-2**. More specifically, **Mitigation Measure NOI-1** would lead to replacement of worn mufflers and to retrofitting where mufflers are not in use. Using optimal muffler systems on all equipment would reduce construction noise levels by 10 dBA or more.⁵⁷

Other effective methods of diminishing the noise impacts associated with individual pieces of construction equipment is to employ less noisy machinery. This is accomplished by specifying the quietest available equipment. Modifications such as dampening of metal surfaces or a redesign of a particular piece of equipment is effective in reduction noise due to vibration. These modifications are typically conducted by the manufacturer or with factory assistance. The reduction is controlled by the imposed limits on the technical capabilities of the manufacturer or the equipment user. Noise reductions of up to 5 dBA can be achieved using dampening materials.⁵⁸ Additionally, shields such as sound skins may achieve reductions of 20 dBA at high frequencies and 10 dBA in the middle frequency range. Sound aprons may achieve noise reductions of up to 10 dBA.⁵⁹ Sound aprons are typically designed from absorptive mats and are draped on the frames attached to the equipment. This material can be constructed from polyvinyl chloride (PVC) layers, lead-filled fabric, or rubber. These aprons are most useful when equipment only needs partial shielding or has to be regularly moved.

57 FHWA. "Special Report—Measurement, Prediction, and Mitigation." June 28, 2017. Accessed September 2024. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

58 FHWA. "Special Report—Measurement, Prediction, and Mitigation." June 28, 2017.

59 FHWA. "Special Report—Measurement, Prediction, and Mitigation." June 28, 2017.

Additionally, a temporary barrier breaking the line of sight between the construction equipment and exterior use areas of noise sensitive receivers can achieve a 5 dBA reduction. Limiting the number of noise-generating, heavy-duty construction equipment to two (2) pieces operating simultaneously would reduce construction noise levels by approximately 1.5 dBA.

With implementation of **Mitigation Measures NOI-1**, which includes a minimum reduction of 10 dBA or more with optimal muffler systems, a minimum reduction of 5 dBA for dampening materials, a minimum reduction of 10 dBA for sound aprons, and a minimum reduction of 1.5 dBA for limiting operating equipment simultaneously, construction noise levels would be reduced by a minimum of 31.5 dBA (Leq 1-hour). Moreover, the Project would be required to comply with Section 41.40 of the LAMC by ensuring construction activities would only occur between the hours of 7:00 AM and 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday and national holidays, with no construction permitted on Sunday. Compliance with the aforementioned practices would ensure construction noise levels would be below the significance threshold; thus, construction noise levels would not be considered significant.

Temporary shoring may be required during construction of the Project. If shoring is required, a sheet or soldier pile wall may be installed. Piles are typically driven, drilled or pressed. Driving piles can result in noise and vibration levels that may be significant. Alternative installation systems, such as press pile or hydraulic drilling systems, result in less substantial noise and vibration levels. If piles are installed, **Mitigation Measure NOI-2** would require that piles be installed using quiet pile driving systems, including press pile or hydraulic drilling systems capable of limiting any temporary increases in noise during construction to no greater than 5 dBA above ambient noise levels to ensure noise impacts during construction would be less than significant.

Off-Site Construction Noise

Construction of the proposed Project would require worker, haul, and vendor truck trips to and from the site to work on the site, export demolition debris, and deliver supplies to the site. Trucks traveling to and from the Project Site would be required to travel along a haul route approved by the City. At the maximum approximately 58 hauling trips per day would take place during the demolition phase. Haul truck traffic would take the most direct route along Jefferson Boulevard and Centinela Avenue to the CA 90 Freeway.

Noise associated with construction trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of worker and hauling trips in a day. Project haul truck trips which includes medium- and heavy-duty trucks would generate noise levels of approximately 54.9 dBA and 59.7 dBA, respectively, measured at the nearest sensitive receptors along the haul route, which includes the residential uses along Jefferson Boulevard and La Cienega Boulevard. As such, off-site construction noise impacts would not be considered significant.

Fixed Mechanical Equipment

The proposed Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate noise-control devices—such as sound attenuators, acoustics louvers, or sound screens/parapet walls—to comply with noise-limitation requirements provided in Section 112.02

of the LAMC, which prohibits equipment from causing more than a 5 dBA increase in the ambient noise level. Therefore, operation of mechanical equipment associated with the proposed Project would not exceed the City's threshold of significance.

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

Less than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB.⁶⁰ A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

In August 2024, Department of City Planning released their updates to the construction noise and vibration thresholds. The following thresholds apply to both on- and off-site construction activities associated with a project:

Human Annoyance

- Daytime Construction Activities: No numerical threshold.
- Nighttime Construction Activities: Maximum 0.80 VdB at the exterior of a vibration sensitive use building.

Building Damage

Construction activities shall not exceed the following building damage thresholds for the identified structures:

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV

60 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed September 2025.

- Older Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

Ground-borne vibration impacts were evaluated by identifying potential vibration sources estimating the distance between vibration sources, vibration sensitive receptors, and surrounding structure locations; and making a significance determination based on the significance thresholds.

Construction activities for the Project have the potential to generate low levels of ground-borne vibration to vibration-sensitive uses, including the surrounding residential uses. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

Temporary shoring may be required during construction of the Project. If shoring is required, a sheet or soldier pile wall may be installed. Piles are typically driven, drilled or pressed. Driving piles can result in noise and vibration levels that may be significant. Alternative installation systems, such as press pile or hydraulic drilling systems, result in less substantial noise and vibration levels. If piles are installed, **Mitigation Measure NOI-2** would require that piles be installed using quiet pile driving systems, including press pile or hydraulic drilling systems capable of limiting vibration levels to 72 VdB to ensure vibration impacts are less than significant.

Table XIII-2: On-Site Construction Vibration Impacts—Building Damage presents construction vibration impacts associated with on-site construction in terms of building damage. As shown in **Table XIII-2**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the surrounding residential uses. Therefore, construction vibration impacts would be less than significant and no mitigation measures are required.

TABLE XIII-2: ON-SITE CONSTRUCTION VIBRATION IMPACTS –BUILDING DAMAGE

Site	Nearest Off-site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment				Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Small bulldozer	
1	Multi-family residential uses along Jefferson Boulevard	0.104	0.038	0.017	0.001	0.5
2	Commercial/Office uses along Jefferson Boulevard	0.005	0.002	0.001	0.000	0.5
3	School and residential uses along Roberts Avenue	0.002	0.001	0.000	0.000	0.5
4	Residential uses along Jefferson Boulevard	0.001	0.000	0.000	0.000	0.5
5	Multi-family residential uses along La Cienega Boulevard	0.001	0.001	0.000	0.000	0.5

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment. Refer to **Appendix D** for Noise Study prepared by Meridian Consultants dated December 2025.

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

No Impact. The Project Site is not within the vicinity of a private airstrip or an airport land use plan. The closest airport to the Project Site is the Santa Monica Airport located more than 2 miles to the west of the Project Site. Therefore, the proposed Project is not within two miles of a public airport or public use airport that would expose people residing or working in the project area to excessive noise levels. Consequently, no impacts associated with noise would result from the proposed Project.

Mitigation Measures

Mitigation measures **NOI-1** and **NOI-2** have been identified to reduce potential noise impacts to a less than significant level due to pile driving activities that could occur on site during construction

of the proposed Project. **MM NOI-1** includes measures from the City's *Construction Noise and Vibration: Updates to Thresholds and Methodology*.⁶¹

MM NOI-1: Noise and Vibration Standards – Construction Noise

Noise Shielding and Muffling

a. Applicability Threshold

Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS.

b. Standard

Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment shall be properly maintained, and the Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

Enclosure or Screening of Outdoor Mechanical Equipment

a. Applicability Threshold

Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS.

b. Standard

All outdoor mechanical equipment (e.g., generators, compressors) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any off-site Noise-Sensitive Uses.

Location of Construction Staging Areas

a. Applicability Threshold

⁶¹ City of Los Angeles, Department of City Planning. Updated Construction Noise and Vibration Thresholds. *Construction Noise and Vibration: Proposed Updates to Thresholds and Methodology*. Accessed September 2025. <https://planning.lacity.gov/odocument/fba26ae5-ca95-48c3-aace-ae3bf0cb43b1/Construction%20Noise%20and%20Vibration%20-%20Proposed%20Updates%20to%20Thresholds%20and%20Methodology%20&%20Attachments.pdf>

Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS.

b. Standard

Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes 'as far as possible' shall be upon the Applicant or Owner, in consideration of the above factors.

Temporary Walls

a. Applicability Threshold

Any Project whose earthwork and construction activities involve the use of construction equipment and require a permit from LADBS; and whose construction activities are located within a line of sight to and within 500 feet of Noise-Sensitive Uses, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses.

b. Standard

Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected between construction activities and Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving that compliance is technically infeasible shall be upon the Applicant or Owner. Technical infeasibility shall mean that noise barriers cannot be located between construction activities and Noise-Sensitive Uses due to site boundaries, topography, intervening roads and uses, and/or operational constraints.

MM NOI-2: Installation of Piles

If piles are installed during construction of the Project, piles shall not be driven. All piles shall be installed using quiet pile driving systems, including press pile or hydraulic drilling systems, that include silencing kits, sound insulation systems or equivalent capable of limiting vibration levels to 72 VdB and any increase in temporary noise levels to not greater than 5 dBA above ambient noise levels.

XIV. POPULATION AND HOUSING

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

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

No Impact. A significant impact could occur if a project were to locate a new development with the effect of substantially inducing growth in an area that would otherwise not have occurred as rapidly or as in great a magnitude. The Project does not propose residential uses. The Project would demolish an existing self storage facility and replace it with a new self storage facility with ground-floor retail on the site. The Project is located in an area already served by urban infrastructure and would not require new or extended infrastructure as the Project Site is already served by existing urban infrastructure and is developed with a self storage facility. The proposed Project includes a replacement self storage facility with a small amount of ground floor retail commercial use. Self storage facilities are a use with minimal demands on water, sewer, power and other infrastructure. As such, the Project would not directly result in substantial changes in regional population growth. Therefore, there would be no impacts, and no mitigation is required.

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

No Impact. A significant impact could occur if a project were to result in the displacement of existing housing units, necessitating that construction of replacement housing elsewhere. No residential housing units exist on the Project Site or would be demolished as part of the Project. The site currently contains a self storage facility utilized for the storage of household goods and a surface parking lot. As such, the Project would not displace any existing people or housing necessitating the construction of replacement housing elsewhere. No impact would occur, and no mitigation is required.

XV. PUBLIC SERVICES

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

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

a. Fire Protection?

Less than Significant Impact. A project would normally have a significant impact on fire protection if the project were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The Project Site is located within the jurisdiction of the Los Angeles Fire Department's (LAFD's) South Bureau, Battalion 18, and served by LAFD Station No. 94, located at 4470 Coliseum Street, approximately 1.8 miles east of the Project Site.⁶² The Project would result in an increase in total floor area on the site, thereby generating a potential increase in activity at the Project Site. However, the Project does not include residential uses.

Los Angeles Municipal Code Section 57.507.3.3 requires industrial land uses located further than 1.0 mile from a LAFD station that houses an engine company and further than 1.5 miles from a station with a truck company to include an automatic sprinkler system.⁶³ The Project would be fully sprinklered and would meet all other design requirements of the LAFD and the State Fire Code. The Project would not result in the need to construct any new or physically altered governmental facilities as it is not expected to result in an increase in calls for emergency fire or medial services nor would it increase the population or construct additional residential dwellings. Project development would not require the construction of new or expanded fire protection facilities. Acceptable service ratio, response times, and other performance objectives would not

62 City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed June 2023. <http://zimas.lacity.org/>

63 City of Los Angeles, Municipal Code, Sec 57.507.3.3, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-346910. Accessed July 2023.

be impacted. Impacts would be less than significant, and no mitigation is required.

b. Police protection?

Less than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) were not able to adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. The Project Site is located within the LAPD's South Bureau jurisdiction. The LAPD Southwest Community Police Station is located at 1546 West Martin Luther King Jr. Boulevard, approximately 4.18 miles east of the Project Site.⁶⁴ The Project would result in an increase total floor area on the Project Site, thereby generating a potential increase in activity at the Project Site. The Project will generate approximately 13 new retail commercial jobs and the replacement of the existing self storage facility.⁶⁵ The new 296,733 square foot self storage facility will only generate one additional job for a total of 16 total employees, 13 retail and 3 self storage facility employees. As the Project does not include residential uses and would only generate a small number of new employment opportunities, it would not result in a substantial increase in demand for police services. Impacts would be less than significant, and no mitigation is required.

c. Schools?

No Impact. A significant impact could occur if a project were to include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project does not include residential uses and would not directly result in the increase of residential population in the area or substantial employment growth. The Project will generate approximately 13 new retail commercial jobs and the replacement of the existing self storage facility.⁶⁶ The new 296,733 square foot self storage facility will only generate one additional job for a total of 16 total employees, 13 retail and 3 self storage facility employees. In addition, the Project will be required to pay the LAUSD Developer Fee, which constitutes full mitigation under CEQA for all impacts of new development on school facilities. As such, no impacts would occur, and no mitigation is required.

d. Parks?

No Impact. A significant impact could occur if a project were to result in the need for new recreation and park facilities and construction of these facilities would create impacts to the environment. The West Adams-Baldwin Hills-Leimert Community Plan area determines the need for additional parks and facilities based on a standard of population density. The Project would replace an existing self storage facility with a new 296,733 square foot self storage facility with a small amount of ground-floor retail commercial space and does not include residential uses. The Project would not increase population density in the area. As such, there would be no increase in

64 City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed June 14, 2023. <http://zimas.lacity.org/>.

65 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf. Accessed September 2023.

66 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf. Accessed September 2023.

demand for recreation and park facilities. Therefore, there would be no impacts, and no mitigation is required.

e. Other public facilities?

No Impact. The Project would develop an existing, nonresidential use with ground-floor retail and would not generate a substantial increase in regional employment or population growth. Therefore, the Project would not result in the need to construct any new or physically altered governmental facilities such as libraries or medical facilities. As such, there would be no impacts, and no mitigation is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project would develop an existing, nonresidential use with an increased intensity of the same use with ground-floor retail. The Project will generate approximately 14 new jobs, 13 retail jobs and one self storage facility job.⁶⁷ The Project would not generate a substantial increase in regional employment or population growth. Given the relative scale of the increase in square feet proposed by the Project, the low number of employees needed in a self storage facility, and the approximately 9 new employment opportunities that would be associated with the amount of retail commercial space proposed, there would be minimal job growth.⁶⁸ Additionally, the Project does not include residential uses and would increase the population. As such, the Project would not lead to a substantial increase in demand for existing recreational facilities. Therefore, the Project would have no impact on recreational facilities, and no mitigation is required.

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

No Impact. The Project would demolish an existing self storage facility and develop a new 296,733 square foot self storage facility on the site with ground-floor retail. The Project does not contain any recreation uses. Given the relative scale of the increase in square feet proposed by

67 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf. Accessed September 2023.

68 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf. Accessed September 2023.

the Project and the low number of employees needed in a self storage facility, there would be minimal job growth. Additionally, the Project does not include residential uses. As previously discussed, the Project would not generate a substantial increase in regional employment. For these reasons, the Project would not lead to a substantial increase in demand for existing recreational facilities that would require construction or expansion of existing recreational facilities. Therefore, the Project would have no impact on recreational facilities and no mitigation is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following section is based on the Technical Memorandum prepared by Raju Associates and approved by LADOT included as **Appendix E** to this IS.⁶⁹

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 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 policies 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.

⁶⁹ See **Appendix E**.

- **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.

Additionally, the Project does not propose restricting the roadway; narrowing the sidewalk; altering or affecting bicycle lanes or other bicycle or transit facilities. The Project would include the dedication of a 5-foot wide strip of land along the La Cienega Place property frontage to allow for the construction of a full-width concrete sidewalk. Additionally, the Project would include the dedication of 3-foot to 10-foot wide strips of land along the Jefferson Boulevard property frontage to allow for the construction of a 15-foot full-width concrete sidewalk. The proposed driveway locations and design conform with the LADOT's Driveway Design Guidelines as it would not conflict with the location of new driveways on an Avenue or Boulevard within 150 feet from the intersecting street. The Project provides design provisions consistent with the City's TDM Ordinance.

The Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) includes greenhouse gas reduction targets that would be applicable to the proposed Project. The Project applies the City's efficiency-based impact thresholds in order to ensure that there is no significant VMT impacts. As such, the Project is consistent with the RTP/SCS.

Furthermore, as stated below, the Project is consistent with the City's VMT goals. As such, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision(b)?

Less than Significant Impact. Consistent with Section 15064.3 of the CEQA Guidelines, the City adopted vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA. Utilizing the City's VMT Calculator Tool (version 1.3) and ITE Trip Generation Manual 11th Edition trip rates. As indicated in the Traffic Assessment, the Project would result in a net increase of 286 daily trips and a work VMT per employee of 8.0, which is less than the impact criteria threshold of 11.6 for the locations. As such, the Project would not cause a significant impact relative to VMT.

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

No Impact. A significant impact could occur if a project were to include new roadway design or introduce a new land use or features into the area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if access or other design features were designed in such a way as to create hazard conditions. The Project Site is currently developed with a self storage facility utilized for the storage of household goods. The Project would demolish an existing self storage facility and develop a new 296,733 square foot self storage facility with ground-floor retail on the site. No changes are proposed to the surrounding

road system.

The Project would widen the two existing curb cuts to accommodate 28-foot driveways and add two new curb cuts on La Cienega Place as well. The Project does not add new driveways along a street designated as an Avenue or a Boulevard and would not include unusual design features. This driveway design is consistent with the City of Los Angeles' driveway requirements as well as the policies included in the City of Los Angeles' Citywide Design Guidelines, October 24, 2019. Driveways are located as far away from street intersections as possible and at as close to a right angle as possible with adequate building setback to allow pedestrians and bicyclists to observe vehicles within the driveways. The number of driveway entrances and overall driveway widths are optimized, thereby reducing the space used and allowing the additional space to be converted to pedestrian use. The Project would increase the width of the sidewalk along Jefferson Boulevard to 15 feet, improving walkability and pedestrian network circulation. Additionally, the Project will feature an open area with landscaping along the Jefferson Boulevard frontage adjacent to the sidewalk, enhancing the overall pedestrian experience.

Construction of the Project may involve obstruction of the rights of way that could impact bicycle or pedestrian facilities along Jefferson Boulevard and La Cienega Place. The Applicant will be required to submit a formal Worksite Traffic Control Plan for review and approval by the LADOT, which will ensure continued safe movement for bicycles and pedestrians.

Based on the review of the combined effects above, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Adherence to all emergency response plan requirements set forth by the City and LAFD would be required through the duration of the Project's construction and operation phases. There would be no impacts regarding hazards due to a design feature, and no mitigation is required.

d. Result in inadequate emergency access?

Less than Significant Impact. A significant impact could occur if a project's design were to not provide emergency access meeting the requirements of the LAFD or LAPD, or in any other way, were to threaten the ability of emergency vehicles to access and serve a project or adjacent uses. Construction of the Project Site may require temporary lane closures of streets adjacent to the site. Emergency access to the Project Site would be provided via Jefferson Boulevard and La Cienega Place. The Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Based on the above, the Project would not result in inadequate emergency access, and Project impacts would be less than significant. No mitigation is required.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less than Significant Impact. As described in **Section V.a: Cultural Resources**, a search of California Historical Resources Information System (CHRIS) records was conducted at the South Central Coastal Information Center housed at California State University, Fullerton in August 2024 to identify any known cultural resources within and in the immediate vicinity of the Project Site. No historical or archaeological resources or previously documented or designated Tribal Cultural Resources were identified on the Project Site.

- 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 Impact. A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the project site in June 2024 by the NAHC. The results were reported as positive and the NAHC recommended contacting the Gabrieleno/Tongva San Gabriel Band of Mission Indians for information. A list of Native American tribes who may also have knowledge of cultural resources in the project area was also provided.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. Tribes are required to respond in writing within 30 days of the City's AB 52 notice. On November 16, 2023, the City mailed a project notification letter to the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe). On November 30, 2023, the City received the Tribe's request for tribal consultation. The City emailed the Tribe on November 30, 2023 requesting a date and time for consultation. The Tribe provided the option of a consultation via email and consultation began on December 7, 2023 when documentation was submitted via email for the Project. A review of the information provided by the Tribe did not find substantial evidence of an existing Tribal Cultural Resource within the project area or the vicinity. Likewise, no evidence has been submitted that considers the specific location of the Project Site, and no criteria has been provided to indicate that the Project area should be considered sensitive as to require on-site monitoring for Tribal Cultural Resources to avoid potential adverse impacts. At the conclusion of the consultation, the Department of City Planning issued a letter dated February 26, 2025, concluding that mutual agreement cannot be reached for purposes of AB 52, and that no substantial evidence exists to support a conclusion that this project may cause a significant impact on tribal cultural resources, therefore the City has no basis under CEQA to impose any related mitigation measures.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Supply

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater

sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft.

The LADWP 2020 Urban Water Management Plan confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The 2020 Urban Water Management Plan water demand projection for 2045 is approximately 710,500 af/y for average years, 746,000 af/y for single-dry years, and 727,400 af/y for multiple-dry years.⁷⁰ As discussed in **Section XIV: Population and Housing**, the proposed Project would not exceed expected regional population growth. As such, it is expected that LADWP has sufficient water supplies available to serve the Project during multiple dry years, and therefore would be sufficient to serve during normal or wet years.⁷¹

All water installation and connections to the existing system would be done in coordination and under the approval of the LADWP. Water demand during construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Although temporary construction water use may be greater than the existing water consumption at the Project Site, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project.

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing water mains and utility services. As shown in **Table XIX-1: Estimated Water Demand**, it is estimated that the Project would have a water demand of 13,602.75 gallons per day (gpd). Water conservation design features are likely to reduce this estimate. Given the distribution capacity of the LADWP, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities.

TABLE XIX-1: ESTIMATED WATER DEMAND

Land Use	Quantity	Demand Factor (gpd/unit) ^a	Daily Demand (gpd)	Annual Demand (afy)
Proposed (Retail)	6.7 ksf	37.5/ksf	251.25	0.28
Proposed (Self Storage)	296.7 ksf	45.0/ksf	13,351.50	14.96
<i>Existing</i>	<i>82 ksf</i>	<i>37.5/ksf</i>	<i>3,075.00</i>	<i>3.45</i>
Net Increase:			10,527.75	11.79

Notes: afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet.

^a 125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.

70 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, https://wuedata.water.ca.gov/public/uwmp_attachments/9314518570/1.%20LADWP%202020%20UWMP.pdf, accessed June 2023.

71 City of Los Angeles Department of Public Works, 2015 City of Los Angeles Urban Water Management Plan (2016).

Wastewater

The Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.⁷² This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

As shown in **Table XIX-2: Estimated Sewage Demand**, it is estimated that the Project would generate 9,068.5 gpd of wastewater. Given the available capacity of the HTP, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities⁷³.

TABLE XIX-2: ESTIMATED SEWAGE DEMAND

Land Use	Quantity	Factor (gpd/unit) ^a	Daily Generation (gpd)
Proposed (Retail)	6.7 ksf	25/ksf	167.5
Proposed (Self Storage)	296.7 ksf	30 ksf	8,901.0
<i>Existing</i>	<i>82 ksf</i>	<i>30/ksf</i>	<i>2,460.0</i>
Net Increase:			5,798.5

Notes: afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet.

^a Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.

Stormwater

A significant impact could occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the existing storm drain system. The Project Site is located in a developed portion of Los Angeles that is currently served by stormwater infrastructure. The Project Site would continue to contain predominantly impervious surfaces, similar to existing conditions. In addition, the Project would be required to demonstrate compliance with the Los Angeles Low Impact Development (LID) Ordinance standards. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects manage runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. Due to the requirement to detain and treat runoff, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

Electric Power, Natural Gas, and Telecommunications

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas and telecommunications services. The Project would develop a new, larger mixed-use self storage facility with ground-floor retail replacing an existing self storage facility. In the context of the greater Los Angeles service area, the Project would not be a

72 LA Sanitation, "Hyperion Treatment Plant," http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

73 Lau, Rowena, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment. City of Los Angeles Inter-Departmental Correspondence to Vincent P. Bertoni, Director, Department of City Planning. June 27, 2023.

substantial source of new demand for services. New connections would be established for the Project; however, no substantial additional infrastructure would need to be installed or relocated to provide electric power facilities, natural gas facilities, or telecommunication services as the Project Site is currently served with these utility services. The existing infrastructure will continue to serve the Project site.

Furthermore, the Project Applicant shall be required to implement applicable building code and LA Green Building Code requirements that would further reduce demand for water, wastewater and energy services. Based on the above, potential impacts of the Project would be less than significant, and no mitigation measures are required.

b. Would the project 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 would increase water consumption to such a degree that new water sources would need to be identified. As shown in **Table XIX-1** above, the Project would increase the water demand. The LADWP 2020 Urban Water Management Plan confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The 2020 Urban Water Management Plan water demand projection for 2045 is approximately 710,500 af/y for average years, 746,000 af/y for single-dry years, and 727,400 af/y for multiple-dry years.⁷⁴ The UWMP projects adequate water supplies through 2045 based on projected population growth. As stated in **Section XIV: Population and Housing**, the Project would not exceed expected regional population growth.

The Project is estimated to have a water demand of 13,602.75 gallons per day (gpd). This would account for less than 0.1% of all water demand. All water installation and connections to the existing system would be done in coordination and under the approval of the LADWP. As such, it is expected that LADWP has sufficient water supplies available to serve the Project during multiple dry years, and therefore would be sufficient to serve during normal or wet years.⁷⁵ Furthermore, as previously stated, the Project would adhere to current standards that would reduce demand on local water supplies. Impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 mgd at the

⁷⁴ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, https://wuedata.water.ca.gov/public/uwmp_attachments/9314518570/1.%20LADWP%202020%20UWMP.pdf, accessed June 2023.

⁷⁵ City of Los Angeles Department of Public Works, 2015 City of Los Angeles Urban Water Management Plan (2016).

Los Angeles–Glendale Water Reclamation Plant).⁷⁶ As such, Project impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill.

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be removed from the Project Site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility.

Which landfill location would be used to deposit waste generated from the Project Site would be determined by the waste hauler and is unknown at this time. However, the County of Los Angeles Department of Public Works prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. As described in the County's most recent report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was approximately 11 million tons in 2020. The total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 19,723 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.

As shown in **Table XIX-3: Estimated Solid Waste Generation**, the Project would generate an estimated increase of approximately 3,136 pounds per day of solid waste. This estimate is conservative because it does not factor in any recycling or waste diversion programs. In addition, Public Storage requires customers to remove their trash from the facility and dispose of their solid waste in accordance with the applicable laws listed below. The rental office for the self storage

76 City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oep8lwklid_4&_afLoop=28344654751341747#!, accessed June 2023.

facility and the proposed retail commercial space will generate solid waste. The permitted County landfills have adequate capacity to accommodate the increase in solid waste generated from the Project. Therefore, solid waste impacts would be less than significant, and no mitigation measures are required.

TABLE XIX-3: ESTIMATED SOLID WASTE GENERATION

Type of Use	Size	Waste Generation Rate ^a (lb./unit/day)	Total Solid Waste Generated (lb./day)
Proposed (Retail)	6.7 ksf	13.0 lb./ksf/day	87.1 lb./day
Proposed (Self Storage)	296.7 ksf	14.2 lb./ksf/day ^b	4,213.1 lb./day
<i>Existing</i>	<i>82 ksf</i>	<i>14.2 lb./ksf/day</i>	<i>1,164.0 lb./day</i>
Net Increase:			3,136.2

Notes: du = dwelling unit; lb. = pounds; ksf = thousand square feet.

^a CalRecycle, "Estimated Solid Waste Generation Rates," <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, accessed June 2023. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

^b The rate was taken for a warehouse of 1.42 lb./100 sf/day, which was then converted to 14.2 lb./ksf/day for consistency.

e. Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. These regulations include:

- California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. These efforts have included permitting procedures for waste haulers and handlers.
- California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), which requires local jurisdictions to adopt an ordinance requiring commercial buildings to provide an adequate storage area for the collection and removal of recyclable materials. The City of Los Angeles passed such an ordinance in 1997.
- AB 341 of 2012 requires businesses to arrange for recycling services.
- AB 1383, effective January 1, 2022, requires business to sort and separately collect organic waste and use organic waste collection services.
- Los Angeles Green Code incorporates the CALGreen Code and is applicable to the construction of new buildings by addressing construction waste reduction, disposal, and recycling.
- Los Angeles Citywide Construction and Demolition Waste Recycling Ordinance requires haulers and contractors responsible for handling C&D waste to obtain a Private Solid Waste

Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste, and C&D waste can only be taken to City-certified C&D processing facilities.

The Project would generate solid waste that is typical of a self storage building, such as that existing on the Project Site currently, in addition to the ground-floor retail. The design of the Project includes space on the ground level for waste collection, divided between recycling and landfill waste. State law requires that commercial businesses recycle either through a contract with an authorized private waste collection service or by self-hauling to a recycling facility. The Project's solid waste would be handled by a private waste collection service. Private waste haulers operating with the City of Los Angeles must obtain an AB 939 Compliance Permit, indicating compliance with applicable regulations related to solid waste.⁷⁷ As such impacts would be less than significant, and no mitigation is required.

77 City of Los Angeles Bureau of Sanitation, "Waste Hauler Permit Program", accessed June 14, 2023. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-whp?_afLoop=10585605931771580&_afWindowMode=0&_afWindowId=uzwfpbf7n&_adf.ctrl-state=19rcwf4u9b_535#!%40%40%3F_afWindowId%3Duzwfpbf7n%26_afLoop%3D10585605931771580%26_afWindowMode%3D0%26_adf.ctrl-state%3D19rcwf4u9b_539.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

No Impact. The Project is not located in or near State responsibility areas. The Project is not located in lands classified as very high fire hazard zones.⁷⁸ The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur, and no mitigation is required.

78 CalFire, Office of the State Fire Marshal, Fire Hazard Severity Zones Maps, Fire Hazard Severity Zone Viewer, accessed June 14, 2023. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. The Project is located in a developed urban area. As indicated by the analysis in this Initial Study, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. Nor would the Project potentially affect important historic or prehistoric resources. As such, impacts would be less than significant, and no mitigation is required.

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. Cumulative impacts refer to two or more individual effects which, when evaluated together, are considerable or would compound or increase other environmental effects. In the preceding topical analyses, cumulative impacts have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the South Coast Air Basin. No significant cumulative impacts have been identified for the Project. As such impacts would be less than significant, and no mitigation is required, and no mitigation measures are required.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Project Mitigation. 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 preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted.